

# Whistleblower Policy

NOVEMBER 2019



## Purpose

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns so that the Nuclear Waste Management Organization (NWMO) can address and correct inappropriate conduct and actions.

## Scope

This policy applies to all directors, officers and employees.

## Roles and accountabilities

### » **President**

The President has responsibility for setting and reinforcing an ethical culture, and ensuring the reporting process as laid out in this policy is executed thoroughly and expeditiously.

### » **Vice-President of Human Resources and Chief Ethics Officer**

The Vice-President of Human Resources and Chief Ethics Officer has oversight and accountability of the process set out in this policy, and to ensure the appropriate handling and investigation of reports under this policy.

### » **Managers and supervisors**

Managers and supervisors are responsible for reporting any complaints that are brought to their attention, and ensuring that employees under their supervision are aware of this policy and familiar with the mechanisms available to report a suspected improper activity.

### » **Directors, officers and employees**

Directors, officers and employees are responsible for following the Code of Conduct, reporting serious concerns for investigation, participating fully in any investigation they are involved in, and ensuring they do not participate in any retaliation.

### » **Chair of the Board**

The Chair of the Board is responsible for ensuring complaints made against Board members or the President are appropriately handled and investigated, in addition to any other complaints raised to the Board's attention.

## Policy

### Reporting

It is the responsibility of all Board members, officers and employees to report concerns about violations of the NWMO's Code of Conduct, or suspected violations of law or regulations that govern the NWMO's operations.

Employee concerns can be reported to your manager, your human resources manager, or the Vice-President of Human Resources and Chief Ethics Officer using any method you prefer – in person, by phone, or through Integrity Counts, our third-party reporting tool. Board members should report their concerns to the Chair of the Board.

### Anonymous reporting by employees

Integrity Counts provides an option for anonymous reporting by toll free number at 1.866.921.6714, online at [www.integritycounts.ca/org/nwmo](http://www.integritycounts.ca/org/nwmo), or via email at [nwmo@integritycounts.ca](mailto:nwmo@integritycounts.ca). This service is available 24 hours a day, seven days a week, and is provided by Whistleblower Security Inc., an independent third-party service provider that does not have caller ID and will not attempt to determine the caller's identity.

### Reporting by non-employees

Non-employees may submit a report to the NWMO's President or the NWMO's Board of Directors, care of the Chief Ethics Officer. Details concerning how to make a report are posted on the NWMO's website at [www.nwmo.ca](http://www.nwmo.ca).

### Investigation

All reports will be taken seriously, and will be documented and investigated. The President will be advised of all complaints and their resolution.

The Board of Directors, and Human Resources, Compensation and Governance committee will receive a summary report at least annually, and the Audit, Finance and Risk committee will be advised of any compliance, accounting or alleged financial improprieties, or any concerns or complaints regarding corporate accounting practices, internal controls and auditing.

### Consequences

Those who do not comply with the Code of Conduct, or anyone who knowingly makes a false statement, or a malicious or knowingly false allegation, or provides false information, may be subject to disciplinary action up to and including termination from employment and/or legal action.

### No reprisal or retaliation

Retaliation or reprisals for good faith reporting under the Code of Conduct will not be tolerated, including in connection with providing information or assistance to any investigation. Anyone who engages in retaliation or reprisal against someone who has made a good faith report will be subject to discipline, which may include termination of employment or contract.

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**For more information,  
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