

NEW - Whistleblower Policy

July 2025

Purpose

The Responsible Gambling Council (RGC) is committed to the highest standards of integrity, accountability, and ethical standards of performance, through fostering an environment where all employees, volunteers, contractors, stakeholders, clients and any other individuals who have a working relationship with RGC can in good faith fulfil their duty to report any concerns regarding suspected illegal, unethical, or improper misconduct within the organizations without fear of retaliation.

1. Scope

- This policy applies to all employees, volunteers, contractors, stakeholders, clients and any other individuals who have a working relationship with RGC. It covers concerns related to but is not limited to the following:
 - a) violations of laws or regulations;
 - b) fraud, theft, or financial mismanagement;
 - c) harassment, discrimination, or workplace misconduct;
 - d) health and safety violations;
 - e) abuse of power or authority; and
 - f) any other unethical or illegal activities within the organization.
- All reports will be taken seriously, investigated appropriately, and addressed in accordance with organizational policies and legal requirements.
- RGC's Board of Directors also has a separate Whistleblower Policy in place that applies to all Board members.

2. Definitions

- a) **Whistleblower:** informing someone in authority within the organization about illegal or unethical behaviour in order to correct the action. A good faith complaint is not about forcing change by “publicizing” an action or decision that someone disagrees with or using negative publicity to force a change of direction.
- b) **Staff/Stakeholders/Clients/Contractors:** defined as all permanent and temporary salaried staff, hourly staff, interns, volunteers and freelancers/contractors and clients under the direction or working with RGC.
- c) **Confidentiality** – The protection of the whistleblower’s identity to the fullest extent possible, unless disclosure is required by law or necessary for a fair investigation.
- d) **Whistleblower Officer** – The designated individual or committee responsible for receiving, reviewing, and investigating whistleblower complaints.
- e) **Good faith:** when a report is made without malice or consideration of personal benefit and the individual has a reasonable basis to believe that the report is true, provided, however, that a report does not have to be proven to be true to be made in good faith.

- f) **Misconduct:** negligent practice, dishonesty, breach of the trust put in a person by virtue of their position; deliberate wrongdoing including non-compliance with policies and transparency and accountability commitments.
- g) **Fraud** – Intentional deception, misrepresentation, or concealment of material facts to gain an unfair or unlawful advantage.
- h) **Conflict of Interest** – A situation where personal interests interfere or appear to interfere with the interests of the organization, leading to biased decision-making or unethical behavior.
- i) **Ethical Conduct** – Behaviour that aligns with the organization’s values, code of conduct, policies, and applicable laws, ensuring integrity and accountability.
- j) **Retaliation:** retaliatory actions include, but are not limited to, demotion, suspension, termination, transfer to a lesser position, denial of promotion, denial of benefits, threats, harassment, cancellation of contractual arrangements, or denial of compensation as a result of whistleblowing.

3. Reporting Responsibility

- Employees, volunteers, contractors, stakeholders, clients and any other individuals who have a working relationship with RGC may report any known or suspected violations to:
 - **First Step: Direct Report** - As a first step, whistleblowers should raise concerns with their immediate manager or department head. *(This will depend on the seriousness and sensitivity of the issues involved and who is suspected of a violation)*
 - **Second Step: HR/Whistleblower Officer** – If the concern involves the manager or department head and the concern is not adequately addressed, the report should be directed to the designated HR/Whistleblower Officer.
 - **Reporting Steps:** Submit concerns via whistleblower@rgco.org. Please include details such as date, time, location, witnesses, and any other relevant information. Feel free to attach supporting evidence including emails, photos, texts. Should you want us to follow up, please include your contact information. See clause 4 regarding confidentiality.
- **Examples of unethical behaviour include but are not limited to:**
 - Conduct which is an offence or a breach of law.
 - Failure to comply with a legal obligation.
 - Unauthorized use of RGC funds or assets.
 - Questionable accounting or auditing practices.
 - Threats to employees and/or contractors’ health or safety.
 - Possible fraud and corruption.
 - Sexual, physical, harassment or other abuse.
 - Abuse of power or authority for any unauthorized or unlawful purpose.

4. Confidentiality

- RGC will take all reasonable steps to protect the identity of the whistleblower. No information will be divulged to external authorities, unless required to do so by law, without the permission of the whistleblower. Alternately, a whistleblower can raise concerns anonymously. Raising concerns anonymously is discouraged, as it limits the ability of the whistleblower to receive feedback for his/her concern.

5. Protection Against Retaliation

- RGC prohibits retaliation against any individual who, in good faith, reports a concern. Retaliation includes but is not limited to termination, demotion, harassment, or any form of discrimination.
- Any individual found to have engaged in retaliation will be subject to disciplinary action up to and including termination of employment or contract.

6. Investigation Process

- All reports will be reviewed by the Whistleblower Officer, HR or an independent committee to determine the credibility and severity of the concern.
- If the concern does not warrant a full investigation, the whistleblower will be informed (if their identity is known) and appropriate action will be taken.
- If the concern warrants an investigation, an impartial investigator (internal or external) will be assigned based on the nature and complexity of the case.
- Investigations will be conducted confidentially, ensure the protection of involved parties, unless otherwise required by law.
- Whistleblowers and witnesses will be interviewed as needed, and relevant documents or evidence will be reviewed.
- The accused individual(s) will have the opportunity to respond to allegations in a fair and unbiased manner.
- Findings will be documented in a confidential report identifying the nature of the complaint, evidence reviewed, witness statements (if applicable), conclusion and recommendations.
- If wrongdoing is confirmed, appropriate corrective action will be taken, which may include disciplinary measures, policy changes, legal action or termination of employment or contract.
- The length of time of an investigation would be determined on a case-by-case basis, depending on the complexity of the issue and the availability of information. The whistleblower (if known) may receive periodic updates and will be informed of the outcome where appropriate, subject to confidentiality requirements.

7. Policy Review and Communication

- This policy will be reviewed annually and communicated to all employees and stakeholders to ensure awareness and compliance.

8. Related Documents/Legislation

- Equity, Diversity, Inclusion, Accessibility and Anti-Racism Strategy (EDIAA) (2024-2026)
- Culture Manual (April 2024)
- Workplace Harassment and Violence Policy
- Code of Conduct
- Ontario Human Rights Code
- Accessibility for Ontarians with Disabilities Act
- Health and Safety



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Responsible Gambling Council

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