

Policies and Procedures

Whistleblower Policy

Policy No: Board 09

Approving Authority: Board

Effective Date: July 1, 2025

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Last Reviewed: July 1, 2025

Policy Statement

This policy sets the expectation and conditions for unethical, illegal, or fraudulent conduct to be reported and addressed. BCNET is committed to ensuring the organization acts in accordance with applicable laws and observes the highest standards of business and personal ethics in the conduct of its responsibilities. This policy sets out the duty of all those involved in BCNET operations to report misconduct or suspected misconduct, including fraud and financial impropriety, and ensures that anyone who makes a report in good faith will be protected from reprisal.

Scope

This policy applies to all BCNET employees, contractors, Board and committee members, and other volunteers supporting the organization.

Duty to Report Misconduct

It is the duty of all employees, Board and committee members, contractors and volunteers to report misconduct or suspected misconduct, including fraud and financial impropriety. Such prohibited misconduct may include, but is not limited to:

- Violations of company policies or procedures
- Unethical or unlawful actions
- Breaches of health & safety standards
- Discrimination, violence, harassment, or abuse of power
- Financial mismanagement or fraud
- Misappropriation or misuse of company resources

No Reprisal

BCNET will not take reprisal in any way against anyone who files a complaint in good faith or who acts as a witness or otherwise participates in the investigation of a complaint. BCNET also prohibits reprisal by anyone against another individual who files a report in good faith or who acts as a witness or otherwise participates in an investigation. Any employee who is found to have engaged in reprisal against a person for seeking assistance through this policy, or for filing a report in good faith, may be subject to discipline, up to and including termination. BCNET will also take appropriate action in

relation to any Board or committee member, volunteer or contractor who is found to have engaged in reprisal in violation of this policy.

Reprisal includes:

- a) Any adverse action or consequence that occurs because an individual has filed a report or provided information about an incident of misconduct;
- b) Intentionally pressuring anyone who is covered by this policy to ignore or not report an incident of misconduct; or
- c) Intentionally pressuring anyone who is covered by this policy to lie or provide less than full cooperation with an investigation of a complaint of an incident of misconduct.

An employee who makes a false complaint or otherwise abuses this process may be subject to discipline up to, and including, termination of employment. Such discipline is not a reprisal or breach of this policy. BCNET will also take appropriate action in relation to any Board or committee member, volunteer or contractor who makes a false complaint or otherwise abuses this process.

Reporting Misconduct

In most cases, an employee's supervisor or any member of the human resources (HR) team is in the best position to address an area of concern. These individuals are also available to provide advice to employees who are considering making a disclosure.

BCNET has also established a mechanism for confidential and anonymous submission of reports through an independent third-party system. This channel is best suited to those wishing to remain anonymous as it creates a secure, controlled, impartial and safe means of communication between the investigator and the reporter. This independent third party provides several options for reporting including an online portal and a hotline. If a report is submitted anonymously, the identity of the individual raising the concern is not known to BCNET. The person submitting the report will be provided with confidential login information that will allow for further anonymous communication through the online portal.

Once a report has been submitted using the third-party system, a notification is sent to a BCNET investigator. The default investigator is BCNET's Chief Financial & Administrative Officer (CFAO). However, when a report is submitted, the complainant can identify if the CFAO is involved in the complaint. In this case, the system will notify the CEO not the CFAO. Similarly, if the complainant identifies the CEO as being involved in the complaint, the system will notify the Board Chair, but not the CFAO nor the CEO.

Review and Investigation

The investigator will respond to the complainant to acknowledge receipt of the reported misconduct within ten (10) business days and initiate a review within thirty (30) business days of receiving the report to determine whether an investigation is required. The format of a review or investigation may vary, depending on the nature and particular circumstances of each report. All reports will be reviewed or investigated, and findings will be presented to the Board Chair within sixty (60) business days unless

there are extenuating circumstances. Appropriate action will be taken at the completion of the review or investigation. The Board will be informed of all such complaints and their disposition.

Reporting of Reprisal

Individuals who believe that reprisal action has been taken against them because they have reported misconduct should forward all information and documentation to support their complaint to the CEO, or directly to the Board Chair depending on the circumstance. Reports of retaliation will be kept confidential to the extent possible, consistent with the need to conduct an adequate review or investigation.

If the result of the review or investigation indicates there is a credible case of reprisal or threat of reprisal, it will refer the findings to the Board and recommend measures to safeguard the interests of the complainant. The CEO may recommend appropriate disciplinary or other actions to be taken against the person(s) who committed the act of reprisal. The Board will make a decision on the appropriate action to be taken.

If the investigation reveals no credible case of reprisal or threat of reprisal, the complainant will be advised of other informal mechanisms on conflict resolution. Regardless of outcome, the complainant will receive a written record of the outcome of the investigation from the investigator. The Board will be informed of the outcome.