Policy Name: Whistleblower Policy	Date of Approval: January 7th, 2026	Activation Date: March 9th, 2026
Approved By: Board of Directors	Version: 2025.1	Replacing Previous Version: N/A
Review Cycle: 3 Years or as required		

1.1 Definitions

a) The following terms have these meanings in this policy:
   i. *"Participants"* – Refers to all categories of individual members defined in the By-laws of the Organization who are subject to the policies of the Organization, as well as people employed by, contracted by, or engaged in activities with, the Organization including, but not limited to, employees, contractors, athletes, coaches, instructors, officials, volunteers, managers, administrators, committee members, parents or guardians, spectators, and Directors and Officers.
   ii. *"Report (or Reported)"* – As defined in the *Code of Conduct and Ethics*.
   iii. *"Worker"* – Any person who preforms for the Organization including employees, managers, supervisors, temporary workers, volunteers, student volunteers, part-time workers, the Board of Directors, and independent contractors.

1.2 Purpose

a) The organization is committed to fostering an environment to open communication regarding the business practices of the organization and to protecting workers from unlawful retaliation and discrimination for their having properly disclosed or reported illegal or unethical contact.
b) To further this commitment, this policy:
   i. Establishes guidance for the receipt, retention and treatment of verbal or written reports received by the organization from a worker regarding actions that (1) are illegal, unethical or contrary to the organization's policies in respect of accounting, internal controls, disclosure, or business practices or (2) constitute discrimination, harassment, violence or abuse against a worker by a director or another worker.
   ii. Provides workers who make a report to a means to make reports in a confidential and anonymous manner; and
   iii. Demonstrates the organizations intention to discipline any person who commits an act of retaliation or reprisal against a worker up to and including termination of employment for just cause, in the case of employees.

1.3 Application

a) This policy only applies to workers who observe, or experience incidents of wrongdoing committed by directors or by other workers.
b) Incidents of wrongdoing or misconduct observed or experienced by participants, volunteers, spectators, parents of participants, or other individuals not employed or contracted by the organization can be reported under the terms of the *Discipline and Complaints Policy* and/or reported to the organizations Board of Directors or senior staff person to be handled under the

terms of the individual Worker's Employment Agreement or Contractor Agreement, as applicable, and/or the organization's policies for human resources.

c) Matters reported under the terms of this policy may to be referred to be heard under the Discipline and Compliance Policy.

1.4 Wrongdoing

a) Wrongdoing can be defined as:
   i. Violating the law;
   ii. Intentionally or seriously breaching the *Code of Conduct and Ethics*;
   iii. Committing or ignoring risk to the life, health, or safety of a participant, volunteer, worker, or other individual;
   iv. Directing an individual or worker to commit a crime, serious breach of policy, or other wrongful act; or
   v. Fraud.

1.5 Pledge

a) The organization pledges not to dismiss, penalize, discipline, or retaliate or discriminate against any worker who discloses information or submits, in good faith, a report against another worker or director under the terms of this Policy.

b) Any individual affiliated with the organization who breaks this pledge will be subject to disciplinary action.

1.6 Reporting Wrongdoing

a) A worker who believes that a director or another worker has committed an incident of wrongdoing should prepare a report that includes the following:
   a. Written description of the act or actions that comprise the alleged wrongdoing including the date and time of the action(s);
   b. Identities and roles of other individuals or workers (if any) who may be aware of, affected by, or complicit in, the wrongdoing;
   c. Why should the action be considered to be wrongdoing; and
   d. How the wrongdoing affects the worker submitting the report (if applicable).

1.7 Authority

a) The following Compliance Officer has been appointed to receive reports made under this Policy: MGA Vice-President

b) After receiving the report, the Compliance Officer has the responsibility to:
   a. Assure the worker of the pledge.
   b. Connect the worker to the Alternate Liaison (as defined in Section 1.8) if the individual feels that they cannot act in an unbiased or discrete manner due to the individual's role with the organization and/or the content of the report.
   c. Determine if the report is frivolous, vexatious, or not submitted in good faith (e.g., the submission of the report is motivated by personal interests and/or the content of the report is obviously false or malicious) and, if so, inform the worker that no action will be

taken on the report and the reasons why the report has been considered frivolous, vexatious, or not in good faith.

d. Determine if the *Whistleblower Policy* applies or if the matter should be handled under the *Discipline and Complaints Policy*.
e. Determine if the local police service should be contacted.
f. Determine if mediation or alternative dispute resolution can be used to resolve the issue.
g. Determine if the President and/or staff person should or can be notified of the report.
h. Begin an investigation, as outlined in 1.9 Investigation.

1.8 Alternate Liaison

a) If the worker feels that the Compliance Officer is unable to act in an unbiased or discrete manner due to the individual's role with the organization and/or the content of the report, the worker should contact the following individual who will act as an independent liaison between the worker and the Compliance Officer: MGA Member at Large
b) The Alternate Liaison will not disclose the worker's identity to the Compliance Officer or to anyone affiliated with the organization without the worker's consent.
c) A worker who is unsure if they should submit a report, or who does not want to have their identity known, may contact the Alternate Liaison for informal advice about the process.

1.9 Investigation

a) If the Compliance Officer determines that an investigation should be launched, the Compliance Officer may decide to contact an external investigator. In such cases, the President and/or senior staff person may be notified that an investigation conducted on an external investigator is necessary without the nature of the investigation, content of the report, or identity of the Worker who submitted the Report being disclosed. The President and/or senior staff person may not unreasonably refuse the decision to contact an external investigator.
b) An investigation launched by the Compliance Officer or by an external investigator should generally take the following form:
    a. Follow-up interview with the Worker who submitted the report.
    b. Identification of Workers, participants, volunteers or other individuals that may have been affected by wrongdoing.
    c. Interviews with such-affected individuals.
    d. Interview with the Director(s) or Worker(s) against whom the Report was submitted.
    e. Interview with the supervisor(s) of the Worker(s) against whom the Report was submitted, if applicable.
c) The investigator will prepare an Investigator's Report that will be submitted to the President and/or senior staff person for review and action.

1.10 Decision

a) Within fourteen (14) days after receiving the Investigators Report, the President and/or senior staff person will take corrective action, as required. Corrective action may include, but is not limited to including:
    a. Enacting and/or enforcing and procedures aimed at eliminating the wrongdoing or further opportunities for wrongdoing;
    b. Revision of job description; or
    c. Discipline, suspension, termination, or other action as permitted by the By-laws, provincial

employment legislation, applicable policies for human resources, and/or the Worker's Employment Agreement or Contractor Agreement.

b) The corrective action, if any, will be communicated to the investigator who will then inform the Worker who submitted the Report.
c) Decisions made under the terms of this Policy may be appealed under the terms of the *Appeal Policy* provided that:
    a. If the Worker who submitted the initial report is appealing the decision, the Worker understand that their identity must be revealed if they submit an appeal, and
    b. If the Director or Worker against whom the initial report was submitted is appealing the decision, the Worker or Director understand that the identity of the Worker who submitted the report will not be revealed, and that the organization will act as the Respondent.

1.11 Confidentiality

a) Confidentiality at all stages of the procedures outlined in this Policy – from the initial report to the final decision – is assured for all individuals (the Worker, the Worker(s), or Director(s) against whom the report is submitted, and the individuals interviewed during the investigation. An individual who intentionally breaches the confidentiality clause of this Policy will be subject to disciplinary action.
b) In all stages of the investigation, the investigator will take every precaution to protect the identity of the Worker who submitted the report and/or the specific nature of the report itself. However, the Organization recognizes that there are some instances where the nature of the report and/or the identity of the Worker who submitted the report will or may be inadvertently deduced by individuals participating in the investigation.