

IISD-ELA Whistleblower Policy

Purpose

This policy covers the steps to take when you feel you have identified or observed conduct in the organization that contravenes the Code of Conduct.

IISD Experimental Lakes Area (IISD-ELA) board directors, employees, volunteers, associates, and consultants (“Representatives”) are usually the first to be aware of any conduct that may be unethical, illegal, or fraudulent, and they must be able to raise legitimate issues in an open and honest way, without fear of negative consequences.

Procedures

Reporting

If you believe, in good faith, that you have uncovered or observed evidence that indicates conduct that is in serious breach of company policy—whether it is unethical, illegal, or fraudulent—you are required to report that conduct and the supporting evidence to an immediate supervisor. If you witness any discrimination against staff that belong to an equity-deserving group, please report it to your supervisor or to Human Resources.

If it is not possible or appropriate to report the information to an immediate supervisor or the IISD human resources team, the information should be reported directly to the executive director. If it is not possible or appropriate to report to the executive director, you should report it directly to the chair of the board of directors.

Any questions or concerns regarding the workplace should be reported to IISD Human Resources.

Supervisors are responsible for receiving reports of misconduct from employees or external clients in confidence and for immediately forwarding such reports to the executive director.

In situations where you prefer to place an anonymous report in confidence, you are encouraged to use the ethics hotline, EthicsPoint, hosted by a third-party hotline provider, NavEx Global.

You may use any of the following three methods to submit a report:

1. Select the “**Make a Report**” link on the [EthicsPoint web page](#). The web page is hosted on a third-party server and therefore is completely confidential.
2. Dial the toll-free hotline number within the United States and Canada: 1-844-955-1643
3. Use the [NavEx mobile app](#)

Nothing in this policy is meant to take precedence over a person’s duties under federal

or provincial law. Any unlawful misconduct or incident that may affect public safety must be reported to the proper lawful authorities immediately.

Confidentiality

Confidentiality is assumed unless you agree that your identity may be revealed. Any and all information collected under this policy or through the investigative process will be held in confidence, except where disclosure may be necessary to further the investigation or as required by law.

Investigating

All concerns raised under this policy will be dealt with promptly. Your concerns will be discussed with you to help determine what action to take.

The ethics committee is responsible for receiving reports of misconduct and will do the following:

- Assess the situation to determine the process of investigation to be followed. The ethics committee is made up of the executive director, Human Resources, and the operations manager/program manager.
- Alert the executive director or, alternatively, the board chair of each disclosure.
- Determine whether external authorities should be notified.
- Lead the internal investigation process.
- Send a report to the executive director or, alternatively, the board chair with the results of the investigation to determine appropriate action.
- Implement actions to resolve the issue and ensure procedural or policy changes that may be necessary to prevent a recurrence.
- Develop and prepare, in consultation with the most appropriate senior authority, a communications strategy for internal and external use regarding the misconduct and/or investigation.
- Provide any information or follow-up as required by executive management, external authorities, or agencies.

In carrying out these responsibilities, the executive director may, at their sole discretion, involve legal counsel and/or independent audit representatives throughout the process.

All parties affiliated with IISD-ELA are required to cooperate with the investigation of incidents under this policy and, if necessary, will be granted paid time off to do so.

Penalties

If a legitimate concern is raised but proves to be unfounded upon investigation, no action will be taken against the reporter.

Anyone who retaliates (through actions such as intimidation, harassment, financial penalty, or other threats) against an employee who has reported a concern in good faith will be subject to disciplinary action. It is important to note that actions taken by Human Resources (based on business needs), such as layoff, termination, demotion, denial of overtime pay or benefits, salary freeze, reduction in work hours or pay, do not constitute retaliation.

Anyone who makes false and/or malicious accusations or who raises concerns for personal gain will also be subjected to disciplinary action.

These policies are established and maintained to set the rules of behaviour and to create a discrimination-free, inclusive, positive, and safe working environment.

Additional Requirements

In addition to our current policies, IISD-ELA requires that all representatives adhere to the following safeguarding standards:

- Representatives will not engage in any form of sexual abuse or exploitation of any person of any age.
- Representatives will not have sexual relations with any person under the age of 18.

Contacts

Following the procedure noted above, the contact information of the executive director and the chair of the board of directors are listed below:

Pauline Gerrard, Executive Director

Email: pgerrard@iisd-ela.org

Sara Daniels, Chair of IISD-ELA Board

Email: sara.daniels@usask.ca

Related Policies, Procedures, and Guidelines

- IISD-ELA Code of Conduct
- IISD-ELA Safeguarding and Protection of Children policy
- IISD-ELA Safeguarding and Protection of Children Procedure: Reporting a Child in Need of Protection
- IISD-ELA Safeguarding and Protection of Children Procedure: Background Checks

Policy Review and Revision

Review cycle: This policy will be reviewed regularly, and at least every 5 years by the policy owner to ensure its relevance and accuracy.

Revision history:

Date	Version	Description of Changes	Approved By
June 16, 2026	1.0	Initial policy release, in the IISD-ELA template	IISD-ELA Board through a Board Resolution