2026

Canadian Pony Club

SAFE SPORT POLICIES

WHISTLEBLOWER POLICY

Loyalty Character Sportsmanship

WHISTLEBLOWER POLICY

Purpose

1. CPC is committed to fostering an environment conducive to open communication regarding the business practices of CPC and to protecting Workers from unlawful retaliation and discrimination for their having properly disclosed or reported illegal or unethical conduct.

2. To further this commitment, this policy:

   a) establishes guidance for the receipt, retention and treatment of verbal or written reports received by CPC from a Worker regarding actions that (i) are illegal, unethical or contrary to CPC's policies in respect of accounting, internal controls, disclosure, or business practices or (ii) constitute discrimination, harassment, violence or abuse against a Worker by a Director or another Worker;

   b) provides Workers who make a report with a means to make reports in a confidential and anonymous manner; and

   c) demonstrates the CPC's 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.

Application

3. This policy only applies to Workers who observe, or experience incidents of wrongdoing committed by directors or by other Workers.

4. Incidents of wrongdoing or misconduct observed or experienced by Organizational Participants, volunteers, spectators, parents of Organizational Participants, or other individuals not employed or contracted by CPC can be reported under the terms of the *Discipline and Complaints Policy* and/or reported to the Organization's 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 CPC's policies for human resources.

5. Matters reported under the terms of this policy may be referred to be heard under the *Discipline and Complaints Policy*, at the discretion of the Compliance Officer.

Wrongdoing

6. Wrongdoing can be defined as:

   a) violating the law;

   b) intentionally or seriously breaching of the *Code*;

c) committing or ignoring risks to the life, health, or safety of an Organizational Participant, volunteer, Worker, or other individual;

d) directing an individual or Worker to commit a crime, serious breach of a policy, or other wrongful act; or

e) fraud.

Pledge

7. CPC 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.

8. Any individual affiliated with CPC who breaks this **Pledge** will be subject to disciplinary action.

Reporting Wrongdoing

9. A Worker who believes that a director or another Worker has committed an act of wrongdoing should prepare a report that includes the following:

a) a written description of the act or actions that comprise the alleged wrongdoing, including the date and time of the action(s);

b) the identities and roles of other individuals or Workers (if any) who may be aware of, affected by, or complicit in, the wrongdoing;

c) why the act or action should be considered to be wrongdoing; and

d) how the wrongdoing affects the Worker submitting the report (if applicable).

Authority

10. The following Compliance Officer has been appointed to receive reports made under this policy:

sportmatters@outlook.com

11. 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 if the individual feels that they cannot act in an unbiased or discrete manner due to the individual's role with CPC 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 be contacted;

f) determine if mediation or alternative dispute resolution can be used to resolve the issue;

g) determine if CPC's President and/or senior staff person should or can be notified of the report; and

h) begin an investigation.

Alternate Liaison

12. 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 CPC 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:

TBD

13. The Alternate Liaison will not disclose the Worker's identity to the Compliance Officer or to anyone affiliated with CPC without the Worker's consent.

14. 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.

Investigation

15. If the Compliance Officer determines that an investigation should be launched, the Compliance Officer may decide to contract an external investigator. In such cases, CPC's President and/or senior staff person may be notified that an investigation conducted by 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. CPC's President and/or senior staff person may not unreasonably refuse the decision to contract an external investigator.

16. 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, Organizational Participants, volunteers or other individuals that may have been affected by the wrongdoing;

c) interviews with such-affected individuals;

d) interview with the director(s) or Worker(s) against whom the report was submitted; and

e) interview with the supervisor(s) of the Worker(s) against whom the report was submitted, if applicable.

17. The investigator will prepare an Investigator's Report – omitting names whenever possible and striving to ensure confidentiality – that will be submitted to CPC's President and/or senior staff person for review and action.

Decision

18. Within fourteen (14) days after receiving the Investigator's Report, CPC's 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 policies and procedures aimed at eliminating the wrongdoing or further opportunities for wrongdoing;

b) revision of job descriptions; or

c) discipline, suspension, termination, or other action as permitted by the By-laws, provincial/territorial employment legislation, applicable policies for human resources, and/or the Worker's Employment Agreement or Contractor Agreement.

19. The corrective action, if any, will be communicated to the investigator who will then inform the Worker who submitted the report.

20. 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 understands 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 understands that the identity of the Worker who submitted the report will not be revealed and that CPC will act as the Respondent.

Confidentiality

21. Confidentiality at all stages of the procedures outlined in this policy – from the initial report to the final decision – is the goal 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.

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,

CPC 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.