



Title: WHISTLEBLOWER POLICY

CLASSIFICATION: CORPORATE AFFAIRS
FIRST ADOPTED: April 20, 2010
AMENDED: February 22, 2017, April 10, 2019

Article 1 Objectives

The aim of this policy is to facilitate the disclosure, in the public interest, of wrongdoings committed or about to be committed in relation to Dawson College and establish a general protection regime against reprisals.

Article 2 Legal Context

This policy is applied in accordance to applicable laws, bylaws, regulations and policies, including without limitation:

- (CQLR D-11.1)
- (CQLR c L-6.1)
- (CQLR c A-2.1)
- (CQLR c N-1.1)
- (BO) wrongdoing can be reported, if they are about the last year:
 - (i) a contravention of a Quebec law, of a federal law applicable made under such a law,
 - (ii) a serious breach of the standards of ethics and professional conduct,
 - (iii) a misuse of funds or property belonging to the College or managed or holds for others,
 - (iv) gross mismanagement within the College, including any act or omission that seriously compromises or may compromise the health or safety or the environment, or
 - (v) directing or counselling a person to commit an act described above.

Article 4 Filing a disclosure

4.1 Internal disclosure

A disclosure is made using a secure [electronic form](#), or a sealed envelope addressed to the Director of Corporate Affairs, with the mention 'Strictly confidential'.

If the wrongdoing involves the Director of Corporate Affairs, the disclosure should be made in writing and addressed to the Director General. If it involves the Director General, it should be addressed to the Chair of the Board of Governors.

A disclosure can be made anonymously. In such case, the information must be sufficient to establish that it is made by an employee of the College.

4.2 Disclosure to the Quebec Ombudsperson

Rather than reporting the wrongdoing internally, an employee or any other person may report it to the Quebec Ombudsperson, as follows:

Direction des enquêtes sur les divulgations en matière d'intégrité publique
Protecteur du citoyen
800, place D'Youville
18e étage
Québec (Québec) G1R 3P4
Phone: 1-844-580-7993 (toll-free within Québec) or 418-692-1578 (in Québec City area)
Fax: 1-844-375-5758 (toll-free within Québec) or 418-692-5758 (in Québec City area)

Secured forms available at: divulgation.protecteurducitoyen.qc.ca

Article 5 Processing times

If a contact is provided with the disclosure, the employee will be contacted and updated as deemed appropriate throughout the process. The maximal processing times from the receipt of the disclosure are as follows:

- i. Five (5) working days to acknowledge reception of the disclosure;
- ii. Fifteen (15) working days to determine the admissibility of the disclosure;
- iii. Six (6) months to conduct the investigation, if applicable.

Article 6 Admissibility of a disclosure

To be admissible, a disclosure must be within the scope set forth in Article 2. A disclosure may be deemed inadmissible if:

- i. It is motivated by personal reasons, such as working conditions, rather than the public interest;
- ii. It is subject to appeal before a court or a decision of a court;
- iii. It questions the effectiveness, efficiency or soundness of the strategies, orientations and transactions related to investment, fund management or debt management activities of the

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The internal disclosure process may be terminated or continued according to the terms agreed to with the transferred body.

Article 9 Confidentiality

9.1 Confidentiality of disclosure

The identities of the individuals making and implicated by the disclosure are confidential. Measures are taken to protect the confidentiality of the disclosure and the investigation proceedings, notably within the framework of the

The disclosure files cannot be accessed nor rectified, notwithstanding dispositions in the

9.2 Communication of information

In order to substantiate the disclosure it may be necessary to communicate information notwithstanding legal obligations regarding confidentiality, loyalty and professional secrecy, as permitted in the , Article 27.

Article 10 Protection against reprisals

The employee making the disclosure, as well as those collaborating in the investigation are protected against reprisal measures such as dismissal, suspension, transfer, or any disciplinary measure affecting work conditions. Complaints can be made to the