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The Club Management Association of Canada (CMAC) is committed to integrity and ethical behaviour in the workplace and will foster and maintain an environment where employees can work safely and appropriately, without fear of retaliation.

This policy has been adopted to ensure that all employees understand that they may report any wrongdoing that may adversely impact CMAC or its members as well as the public at large, without fear of retaliation or a negative impact on their employment status at the Society. Reports of workplace wrongdoing may be made to the CEO, management and supervisory staff, President, Finance & Audit Committee Chair or Governance Committee Chair. A description of who receives which type of complaint can be found on page 3 of this policy.

It is a violation of this policy statement for anyone to knowingly make a false complaint of wrongdoing or to provide false information about a complaint. Individuals who violate this policy are subject to disciplinary and/or corrective action, up to and including termination of employment.

Reporting

Employees who believe they have witnessed a wrongdoing in their working environment are advised to report the incident(s) to their supervisor/manager or to the CEO.

Should a supervisor/manager or the CEO believe they have witnessed a wrongdoing in their working environment, they are advised to report the incident(s) to the President, Finance & Audit Committee Chair, or Governance Committee Chair.

Investigation

CMAC seeks to resolve claims of wrongdoing in the workplace as expediently as possible. Investigations shall be conducted and the appropriate actions taken no longer than 10 days following the filing of a complaint. Depending on the nature of the complaint, a third party may be used to investigate the matter at the discretion of the CEO, President or Governance Committee Chair.

Resolution

The CEO shall advise the complainant and the respondent of the resolution of any investigation conducted under this policy. A copy of the investigative findings shall be provided in writing to the complainant and the respondent.

In all cases, CMAC shall retain the findings report for a minimum of 7 years or for as long as any administrative or legal action arising out of the complaint is pending.

DATE APPROVED	DATE LAST REVISED
August 15, 2019	August 3, 2022



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Confidentiality

All records of workplace wrongdoing reports and subsequent investigations are considered confidential and will not be disclosed to anyone except to the extent required by law.

CMAC will do everything it can to protect the privacy of the individuals involved and to ensure that the complainant and the respondent are treated fairly and respectfully.

Assurance Against Retaliation

Retaliation by the respondent, or anyone acting on behalf of the respondent, against the complainant or witness providing information about a workplace wrongdoing report is strictly prohibited and will result in appropriate disciplinary action. Acts of retaliation include (but are not limited to) interference, coercion, threats and restraint.

Disciplinary Actions

Upon concluding that an instance of workplace wrongdoing has indeed occurred, the respondent may be subject to disciplinary action, which may result in suspension of duties, termination of employment and possible legal action, depending on the severity of the action. Disciplinary actions imposed by the CEO will be determined on the basis of the facts of each case and the extent of harm to the individual or CMAC.

Timelines

Complainants are always encouraged to file a complaint immediately after an alleged incident of workplace wrongdoing. Nevertheless, CMAC is aware that such timely response may not always be possible, due to feelings of fear on the complainant's part. Individuals who believe that they have witnessed workplace wrongdoing should lodge a complaint within 14 days following an alleged incident. Under extreme circumstances, this timeline may be extended at the request of the complainant; however, it is the responsibility of the complainant to show good reasons for this extension.

Records

Records of all formal and informal resolutions, hearings and reviews will be kept by the Administration Department, except where otherwise stated in this policy.

Any records concerning employees will be maintained in accordance with all applicable laws and regulations. Both the complainant and the respondent are eligible to obtain copies of hearings or of their own statements made throughout the course of the investigation.

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Responsibilities of CEO With Respect to Specified Complaints

The CEO is responsible for determining and administering the methods and means for addressing complaints and is also responsible for:

- Determining the veracity of allegations of wrongdoing or retaliation.
- Determining whether a reported act is indeed a wrongdoing.
- Administering disciplinary or corrective actions if allegations are true.
- Administering disciplinary actions if allegations were knowingly falsely made.

At the conclusion of an investigation, the CEO will create a written report including a statement regarding any and all findings that have been proven. The report shall be presented for review to any/all appropriate authorities and/or legal counsel, as appropriate.

Responsibilities of President With Respect to Specified Complaints

The President will take all complaints and concerns regarding any wrong doings of the CEO seriously, and investigate appropriately. Documentation regarding the investigation shall be created and retained. The report shall be presented for review to the Board at an in camera meeting and to any/all appropriate authorities and/or legal counsel, as appropriate.

Responsibilities of Finance & Audit Committee With Respect to Specified Complaints

The Finance & Audit Committee will take all complaints and concerns regarding accounting and auditing matters seriously, and investigate appropriately. Documentation regarding the investigation shall be created and retained. The report shall be presented for review to the Board at an in camera meeting, if required, and to any/all appropriate authorities and/or legal counsel, as appropriate.

Responsibilities of Governance Committee Chair With Respect to Specified Complaints

The Governance Committee will take all complaints and concerns regarding any wrongdoings of the President or any other officer of CMAC seriously, and investigate appropriately. Documentation regarding the investigation shall be created and retained. The report shall be presented for review to the Board at an in camera meeting, if required, and to any/all appropriate authorities and/or legal counsel, as appropriate. The Governance Committee Chair will also take any anonymous complaints about CMAC.

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