

Integrity Assurance Policy (2.2)

Policy:	Integrity Assurance	Effective Date:	Feb, 2022
Last Review Date:	June, 2023	Next Review Date:	June, 2026
Review Frequency:	Every 3 years (June) Gov & HR Committee	Related Supporting Documents:	Bylaws Code of Conduct Policy

Principle

The intent of this policy is to ensure that persons who have concerns about CRNS’s non-compliance with legal, regulatory or ethical standards can raise their concerns freely either internally or externally, and to ensure that such persons are not victimized for raising these concerns. CRNS and its Council strongly desire to understand and act on any breaches of conduct by anyone.

Anyone who becomes aware of a breach is strongly encouraged to come forward to disclose to trusted organizational parties (as described on page 2) and do not disclose to outside parties.

Definitions

The following definitions apply for the purposes of this Policy:

“Integrity Assurance”

Means the deliberate and voluntary disclosure of information about the improper conduct of any CRNS Council member, Executive Director, committee member, auditor or professional service provider to a designated “protected disclosure” party, relating to an actual, suspected or anticipated wrongdoing.

“Discloser”

Means any person who makes or attempts to make a disclosure about such improper conduct.

“Improper conduct”

Means:

1. Corrupt conduct;
2. Fraudulent activity;
3. Conduct relating to the fitness and propriety of a CRNS Council member, Executive Director or Auditor;
4. A substantial mismanagement or misstatement of CRNS resources or financial reporting;
5. Conduct involving substantial risk to public health or safety; or

6. Conduct involving substantial risk to the environment.

In addition, any of the above conduct, if proven, would result in:

- a. A criminal offence;
- b. Liability or reputational/brand risk to CRNS;
- c. Breach of a prudential, financial reporting or other regulatory obligation of CRNS;
- d. Reasonable grounds for dismissing the person who engaged in the conduct, who was, or is, engaged in the improper conduct; or
- e. Reasonable grounds for disciplinary action.

“Protected disclosure”

Means any good faith communication based on reasonable grounds that discloses or demonstrates an intention to disclose information that may evidence improper conduct.

“CRNS personnel”

Means:

1. Any CRNS Council member;
2. Any CRNS Council Committee member;
3. Anyone serving CRNS in a voluntary capacity;
4. Any CRNS Executive Director;
5. Any CRNS Auditor; and

Policy

This policy is written in the form of commonly asked questions and how to proceed with each:

How Do I Make a Disclosure? Designated “protected disclosure” Parties

If a CRNS employee, supplier, vendor, partner or a member of the public (the “discloser”) considers that any CRNS personnel (as defined above) is involved in improper conduct, follow this procedure:

1. In the first instance, disclose to the Executive Director.
2. If the ED is considered involved in the improper conduct, disclose to the Council Chair.
3. If the Chair of the Audit and Finance Committee is considered involved in the improper conduct, disclose to the Council Chair.
4. If any member of Council is involved in the improper conduct, disclose to Council Chair.
5. If the Council Chair is involved in the improper conduct, disclose to the President-Elect.
6. If a CRNS auditor, legal counsel or their officers are considered involved in the improper conduct, disclose to the Council Chair and if required make a report to the regulator responsible for the profession in the Province of Saskatchewan; or

7. If the discloser is not comfortable reporting to the designated party above, due to trust or confidence concerns, or uncertainty over their involvement, then you are encouraged to disclose to the party that you do trust and have confidence in:
 - a. Legal Counsel for Council
 - b. The Audit and Finance Committee Chair
 - c. The President-Elect
 - d. The Governance and Human Resource Committee Chair
 - e. Any Council member, or
 - f. The external Auditor.

The contact details of all of the above are provided at the end of this Policy.

If any person is in doubt whether they can make a disclosure, it is recommended that they first discuss the matter informally with the person to whom they are expected to disclose to under this Policy. That person will be able to advise them on whether the matter is within the scope of this Policy or whether the matter ordinarily would be viewed as one of normal judgment or opinion, and therefore not a matter of a breach of CRNS's compliance or ethics policies.

What Protection Do I Have if I Disclose?

Any person who receives a disclosure will do everything reasonably possible to ensure that the identity of the person disclosing is kept secret during the course of any investigation and until the outcome is made public and will use their best efforts to protect the discloser from exposure, harm or damage.

This Policy forbids any CRNS personnel from acting in a way that penalizes, victimizes or that can be reasonably construed as penalizing any person who has made a disclosure or intends to make a protected disclosure under this Policy.

However, such protection cannot be guaranteed in certain circumstances, for example:

1. If the person disclosing has informed other persons of the fact they have made a disclosure or their intention to make a disclosure;
2. Where the investigation leads to charges being made in court which must be made public; or
3. Where the nature of the allegations is such that the identity of the person disclosing can be deduced.

As soon as possible after the first disclosure, the person who receives the disclosure will discuss the issue of confidentiality with the person disclosing, as well as the degree of risk that their identity will become known.

Any person who receives a disclosure will advise the person disclosing promptly if matters change in a way that affects CRNS's ability to protect their identity, and will give them as much warning as

reasonably possible if it appears likely to the person who receives the disclosure that their identity will become known.

Can I make a Disclosure Anonymously?

Yes, you can. However, it is recommended that the person disclosing reveal their identity when making a disclosure. It is easier for CRNS to protect you and to carry out any necessary investigation more effectively.

What Evidence do I Require for my Disclosure?

Documentary evidence of the concern is desirable to enable an investigation to start. At the least, you will need to be able to tell the person receiving the disclosure:

1. the person who is suspected to be involved in the improper conduct,
2. when it occurred, and
3. who was affected.

The more evidence is provided, the more effective the investigation of their concern is likely to be.

What Follows After a Disclosure is made?

A disclosure will be investigated promptly, vigorously and discreetly.

In the case of Council or Committee member being the subject of an investigation, Council will appoint an investigator. The investigator will take all reasonable steps to ensure that investigations into disclosures are fair and unbiased. This means that:

1. Investigations will be carried out as fast as reasonably practicable and with a degree of confidentiality consistent with the seriousness of the allegations raised;
2. If necessary, the investigator will obtain specialist, independent advice on matters outside their knowledge or expertise; and
3. At the appropriate time, the person(s) who may be affected by the investigation will be given the opportunity to put their case and to be aware of the allegations and evidence against them, at the appropriate time.

The investigator will keep detailed records of all interviews conducted and all records reviewed during the investigation.

At the end of the investigation, if appointed by Council the investigator will submit a report to the Audit and Finance Committee. This report will summarize the conduct of the investigation and the evidence collected, draw conclusions about the extent of any non-compliance, and recommend action to remedy the non-compliance and ensure that it does not recur. The Audit and Finance Committee will review the findings and provide a report and recommendations to Council.

Contacts

(see section above on *How Do You Make a Disclosure?*)

Cindy Smith, Executive Director, 306 359-4235 csmith@crns.ca

Roger Lepage, Legal Counsel for Council, (306) 347-8332 rlepage@millerthomson.com

Leah Thorp, Audit and Finance Committee Chair, 306 530-2368 leah.thorp0707@gmail.com

Moni Snell, President, 306 581-1051 moni.snell@gmail.com

Janna Krismer, President-Elect, 306 381-5706 Jannabananer3@yahoo.ca

Doug Finnie, Governance and Human Resource Committee Chair 306 280-5200 da.finnie@sasktel.net

Sheila Fillion, Virtus Group, External Auditor 306 337-3048 sfillion@virtusgroup.ca

Mark your disclosure "PRIVATE AND CONFIDENTIAL"