

Whistleblower Policy

I. Introduction

The Chartered Professional Accountants of Alberta (“CPA Alberta”) is committed to the highest ethical standards. CPA Alberta honors this commitment by conducting its business with maximum integrity and full compliance with all applicable laws as well as CPA Alberta’s bylaws, resolutions and directives. In keeping with this commitment, CPA Alberta provides an avenue for CPA Alberta employees, volunteers and other stakeholders to raise any concerns they may have about the subjects covered by this Policy and to be assured that in making complaints they will be protected from reprisal or victimization for raising concerns in good faith.

II. Who is a “Whistleblower”?

A whistleblower is any past or present CPA Alberta Board member, officer, employee, volunteer, service provider or consultant who makes a complaint of a Reportable Activity (as defined below) in accordance with this Policy.

III. What is “Reportable Activity”?

This Policy covers instances where an employee, volunteer or other stakeholder has evidence of activity (“Reportable Activity”) by any past or present CPA Alberta Board member, officer, employee, volunteer, consultant, service provider or other stakeholder that to his/her knowledge constitutes:

- Accounting, audit or other financial reporting fraud or misrepresentation.
- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement.
- Fraud or deliberate error in the recording and maintaining of financial records.
- Deficiencies in or non-compliance with CPA Alberta’s internal accounting controls.
- Misrepresentation or false statements to or by a Senior Executive or accountant regarding a matter contained in the financial records, financial reports or audit reports.
- Deviation from full and fair reporting of CPA Alberta’s financial condition.
- Any type of fraud or theft.

- Violation of any applicable law that could result in fines or damages payable by CPA Alberta or could otherwise significantly harm CPA Alberta's reputation or public image.
- Failure, refusal or neglect to comply with any legal obligation to which a volunteer or employee is subject.
- Unethical business conduct in violation of CPA Alberta's established policies, including CPA Alberta's Code of Conduct.
- An act of retaliation by any officer, employee or volunteer against a person who reported an activity under this Policy.
- Any matter referred to above that has been, is being or is likely to be deliberately concealed.

The commission of a Reportable Activity could subject the violator to disciplinary action which, depending on the circumstances, may include the termination of employment for cause, severing of the relationship with the volunteer, consultant, or service provider (as the case may be), discipline in accordance with CPA Alberta's governing documents, and legal action.

IV. No Retaliation

CPA Alberta will not permit any past or present CPA Alberta Board member, officer, employee, volunteer, consultant, service provider or stakeholder to harass, retaliate or discriminate against any person who in good faith reported a Reportable Activity. Retaliation in any form will not be tolerated and should be reported using the reporting process set out below.

As a Reportable Activity, any retaliatory conduct, may subject the violator to sanction and disciplinary action, which, depending on the circumstances, may include the termination of employment for cause, severing of the relationship with the volunteer, consultant, or service provider (as the case may be), discipline in accordance with CPA Alberta's governing documents, and legal action.

V. Employment Matters

This Policy does not apply to complaints of CPA Alberta employees relating to human resource issues such as unsatisfactory employee feedback, performance evaluations, or work assignments. For personnel issues relating to matters of harassment, discrimination, or workplace violence reports must be made in accordance with CPA Alberta's Policy against Harassment, Workplace Violence and Discrimination. Other personnel matters or concerns should be raised with CPA Alberta's Human Resources.

However, human resource issues such as unsatisfactory employee feedback, performance evaluations, or work assignments which are retaliatory actions for reporting a Reportable Activity which under this Policy are considered a Reportable Activity and therefore this Policy will apply.

VI. Complaints made in Bad Faith

Integrity is at the heart of CPA Alberta's activities, including this Policy. Consequently, complaints of a Reportable Activity not made in good faith will be viewed as serious misconduct and may be subject to sanction including:

- Discipline up to and including the termination of employment for cause (in the case of employees).
- The severing of the relationship with volunteer, consultant, or service provider.
- Discipline in accordance with CPA Alberta's governing documents.
- Removal from the Board.

VII. Receipt of Complaint

A person may submit a complaint of Reportable Activity in writing by completing the Report Form (Appendix A) and providing it to any or all of: the CEO, CFO, Senior Vice President, Regulatory, the Audit & Risk Committee (ARC) Chair, and the Board Chair.

Completed Report Forms should be sent to the above individuals by e-mail or by regular mail.

Alternatively, and to maintain absolute anonymity, a complainant may submit their complaint electronically via a link that is conveniently displayed on the Insider. Please note that the electronic form will automatically be submitted to all five (5) individuals. Should you wish to send your complaint to only the Board Chair, please email your complaint directly to that individual. Please see Appendix B for contact information, which will be updated from time to time.

A complainant may remain anonymous. (Note: if a complainant wishes to remain anonymous, they should not e-mail the Report Form from their CPA Alberta account.) However, in order to allow for a better investigation of a complaint, a complainant should consider identifying themselves by giving their name, their telephone number and other contact information. Even if such contact information is not provided, the substance of the complaint will be treated with utmost confidence and not discussed with others except to the minimum extent necessary to conduct a complete and fair investigation. In all cases, the person who is alleged to have committed the infraction will be made aware of the complaint at an appropriate point during the investigation.

Whether a complainant chooses to identify themselves or not, they should give as much information as possible on the subject matter of the complaint so that the information is sufficient to enable a full investigation. Such information should include details as to where and when the incident(s) occurred, the names and titles of the individuals involved and as much other relevant detail as the complainant can provide.

VIII. Investigation of Complaints

Upon receiving notice in writing or via web submission of a Reportable Activity the action taken will depend on the nature of the Reportable Activity. See appendix A for information on reporting a Reportable Activity.

The ARC Chair is responsible for investigating and resolving most types of reports made under this Policy. In certain circumstances, this individual may refer the matter to, or seek the assistance of employees or others depending upon the nature of the Reportable Activity. For example, if the Reportable Activity relates to a regulatory compliance issue, the ARC Chair may refer the Reportable Activity to an appropriate regulatory staff member or committee. However, under no circumstances will a matter be referred to an employee of CPA Alberta who is the subject of any Reportable Activity or is otherwise an inappropriate person to assist with the investigation.

If any Reportable Activity involves:

- questionable accounting or other matters which, if true, has, or even could have the potential to have, a material effect on CPA Alberta's financial position or its future prospects; or
- an alleged impropriety involving an executive or employee of CPA Alberta,

the ARC Chair will promptly call a meeting of ARC to disclose the substance of the complaint to the committee. Except in emergent circumstances where constituting a quorum of ARC is impractical, ARC may then, by majority vote, commence an investigation of the Reportable Activity (or transfer such investigation to a specially appointed committee of the Board). ARC or special committee may enlist the assistance of one or more CPA Alberta employees and outside legal, accounting or other advisors, as may be appropriate to conduct the investigation.

IX. Investigation by the Chair of the Board

If the complaint concerns the ARC Chair or one of its committee members and is directed to the Board Chair, it will be investigated by the Board Chair.

X. Reporting

The ARC Chair will advise ARC, the CPA Alberta Board, and CPA Alberta's external auditors of all complaints received (and the summary results of investigations) on a quarterly basis in conjunction with the Chief Financial Officer and Senior Vice President, Regulatory, as appropriate.

CPA Alberta's Executive Office shall retain any reports of Reportable Activity and any resulting investigations for a period of not less than seven (7) years, or in an acceptable manner at the discretion of the Board. Such preservation obligation shall include the making of written summaries of any oral complaints or reportable activity.

XI. Review of this Policy

This Policy will be reviewed at least every two years by ARC to ensure that it conforms with CPA Alberta's policies and legal obligations and otherwise addresses the needs of CPA Alberta.

Appendix A

CPA Alberta Whistleblower Complaint Form: <https://whistleblower.cpaalberta.ca/>

Please note that this form is only to be used for complaints on matters covered in the Whistleblower Policy. For other types of complaints, please contact CPA Alberta.

Appendix B

Contact Information

CEO	rmiller@cpaalberta.ca
CFO	myao@cpaalberta.ca
Senior Vice President, Regulatory	jhunder@cpaalberta.ca
Board Chair	boardchair@cpaalberta.ca
Audit & Risk Committee Chair	board@cpaalberta.ca

All of the above contacts can be reached care of The Chartered Professional Accountants of Alberta through CPA Alberta's Executive Office located at:

Chartered Professional Accountants of Alberta
Whistleblower Complaints
1900-10088 102 Ave
Edmonton, Alberta
T5J 2Z1