

## **WHISTLEBLOWER POLICY**

<b>Division:</b>	Executive	<b>Approved By:</b>	Board of Directors
		<b>Approval Date:</b>	September 12, 2020
<b>Date Created:</b>	June 20, 2018	<b>Last Revised:</b>	April 22, 2025

### **Introduction**

Every director, officer, employee, ambassador, volunteer, contractor and consultant of Operation Eyesight Canada and the following organizations – Operation Eyesight Universal India, Operation Eyesight East Africa, Operation Eyesight Universal USA, Operation Eyesight Zambia and Operation Eyesight Ghana (hereinafter referred to as “Operation Eyesight”) - occupies a position of trust.

Each individual that performs work on behalf of Operation Eyesight, including directors, officers, employees, ambassadors, volunteers, contractors and consultants, will hereinafter be referred to as “Representative(s)”.

Operation Eyesight is committed to the highest ethical standards. We do this by conducting our business with integrity and by achieving full compliance with all applicable laws, rules, and regulations. In line with this commitment, Operation Eyesight provides an avenue for Representatives to raise any concerns they may have and to be assured that in making complaints they will be protected from reprisal for raising their concerns in good faith.

This policy covers instances where a Representative has evidence of a violation or suspected violation that to the best of their knowledge constitutes:

- Accounting, auditing, or other financial reporting fraud or misrepresentation;
- Violations of laws that could result in fines or civil damages payable by Operation Eyesight, or that could otherwise significantly harm Operation Eyesight’s reputation or public image;
- Unethical business conduct in violation of any corporate policy, including, but not limited to the Code of Conduct;
- Danger to the health, safety, or well-being of any Representative or the general public (including any real, or perceived threat of, workplace violence or harassment).

### **General**

Operation Eyesight’s Code of Conduct and all other policies (“the Policies”) require Representatives to observe high standards of business and personal ethics and adhere to the Policies in their conduct of their duties and responsibilities and in their dealings and activities.

## **Reporting Responsibility**

It is the responsibility of all Representatives to comply with the Policies and to report violations or suspected violations.

## **No Retaliation**

Operation Eyesight will not permit any Representative to harass, retaliate or discriminate against others who, in good faith, reports a violation or suspected violation. Retaliation in any form will not be tolerated and should be reported using the channels detailed below. Any violation of this Policy may be subject to disciplinary action up to and including termination of employment, termination of contract or legal action.

Complaints that are *not* made in good faith will be viewed as a serious offence and may be subject to discipline up to and including termination of employment or contract.

## **Acting in Good Faith**

Any Representative who brings forward a concern or complaint relating to a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information being disclosed indicates a violation or suspected violation of any Policy. Any allegations that are not substantiated and are found to be malicious, frivolous or were knowingly false will be viewed as a serious matter and the person making such complaint or submission may be subject to disciplinary action up to and including termination of employment or contract.

## **Reporting Violations or Suspected Violations**

Every Representative has a duty to adhere to this Policy, all applicable policies and to immediately report to your manager, or the Manager, HR through HR@operationeyesight.com, any suspected violations.

In most cases, your manager is the best person to address concerns. However, if you are not comfortable speaking with your manager or you are not satisfied with the response, you are encouraged to speak to the Manager, HR through HR@operationeyesight.com, or alternatively, to the Chair of the Governance Committee of Operation Eyesight Canada.

In addition to the foregoing, any Representative may report questionable accounting or auditing matters, which may be done on an anonymous basis, by submitting a written complaint to the Chair of the Audit and Finance Committee of Operation Eyesight Canada.

Any complaint that has been brought forward to a supervisor, manager, Manager HR through HR@operationeyesight.com, or the Chief Executive Officer is required to be reported to the Chair of the Governance Committee of Operation Eyesight Canada, who has the responsibility to investigate all reported violations or suspected violations.

## **Confidentiality**

Concerns regarding violations or suspected violations may be submitted on a confidential basis by the person who has the concern. Reports of violations or suspected violations will be kept confidential to the extent possible consistent with the need to conduct an adequate investigation.

## **Handling of Reported Suspected Violations or Violations**

All reports of violations or suspected violations will be promptly investigated and appropriate corrective action taken if warranted by the investigation.

## **Annual confirmation**

All Representatives are required to confirm annually in writing that they have reviewed and agree to adhere to the terms of this Policy.

## **Whistle Blowing Compliance Contact Information (as of April 10, 2024)**

Chair of the Finance and Audit Committee

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