



Finance

Whistleblowing Policy

Title:	Whistleblowing Policy
Policy #:	FIN-POL-031 R0 (Whistleblowing Policy)
Applies to:	Ornge
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Approval Level:	Board of Directors
Category:	Corporate Governance

1. INTRODUCTION

Ornge is committed to fulfilling its mandate to provide an integrated system of air ambulance and related services in the Province of Ontario with the highest standards of professionalism, ethics, and compassionate patient care.

Ornge has established a corporate governance framework that includes the Living Our Values policy, the Code of Conduct Policy, the Conflict of Interest Policy and this policy in support of our mandate. In the Living Our Values statement, we explain our core values of kindness, respect, integrity, safety and professionalism (“**Ornge Values**”). The Code of Conduct further explains the Ornge Values, emphasizes the importance of honesty and integrity, and provides a mechanism for reporting violations of the Code of Conduct. This policy supports the Code of Conduct by providing a mechanism to report ethical misconduct to an Independent Ethics Administrator (“**IEA**”), have the matter investigated, and addressed by the Ornge Board.

To further encourage and support our ethical values, Ornge provides protection to all whistleblowers who report any alleged misconduct under this Policy or any other Ornge policy in good faith.

This Policy is also available on the Ornge Internet site: [www.ornge.ca: https://www.ornge.ca/governance/corporate-policies](https://www.ornge.ca/governance/corporate-policies). Current, prospective, retired/past and newly hired employees (including contracted employees), contractors, current and prospective suppliers of goods and services, as well as the general public, have access to the website. This Policy is also made available to new employees during the hiring process, which is managed by the Human Resources department.

2. SCOPE

This policy has been drafted with a focus on Ornge and Ornge Global Air employees (collectively “**Employees**”). It is our expectation that all directors, contractors, volunteers, students, visitors or any person engaged in business with Ornge

("Third Parties") will comply with this policy. In the event that any Third Parties violate this policy or encourage or participate in any ethical misconduct, Ornge will take such remedial action as it considers necessary to address the situation including investigating any Reports or terminating its relationship with the Third Party.

3. GOVERNING PRINCIPLES

A. ETHICAL MISCONDUCT

Ethical misconduct that violates the Ornge Values of our Code of Conduct is unacceptable. All employees, vendors and contractors are encouraged to report ethical misconduct under this policy. This policy applies to any suspected improprieties regarding purchasing of good or services, accounting or auditing matters, breach of law; including but not limited to fraud, a breach of the Ornge Values or our Code of Conduct or other ethical concerns, involving employees, contractors, vendors, or any other parties with a business relationship with Ornge ("**Ethical Misconduct**").

Ornge has an extensive policy framework for dealing with inappropriate conduct by employees that also provides mechanisms for filing complaints or reports of Ethical Misconduct. Any employee who wishes to report anything that may be included in the definition of Ethical Misconduct, but is specifically covered by another policy should always report it under that policy first. Refer to Section 7 below.

B. REPORTING TO MANAGEMENT

If an employee is comfortable doing so, any Ethical Misconduct may be reported to his or her manager or a member of the Executive Management Team ("**EMT**") first. If the Ethical Misconduct concern is not appropriately addressed by Ornge management, or if an employee is uncomfortable reporting Ethical Misconduct to management, then it must be reported to the IEA.

C. REPORTING ETHICAL MISCONDUCT

All Ethical Misconduct not addressed through a report to management must be reported to the IEA through any of the following **Whistleblowing Mechanisms**:

- 1) Website: <https://app.alias-solution.com/contact/en/ornge>
- 2) Phone: 1-866-441-4362
- 3) Email: ca-fmorng.whistleblowing@kpmg.ca

Any Whistleblower Complaint "**Complaint**" should be made on a timely basis. Any delays in filing a Complaint may hamper or prevent an appropriate investigation.

All Complaints should provide sufficient detail regarding the nature of the Ethical Misconduct alleged, the name(s) of the individual(s) involved in the Ethical Misconduct (the "**Respondent**"), the dates of each occurrence and any relevant documents. Please note that all communications are confidential. The person making the Complaint (the "**Complainant**") is encouraged to provide his or her contact details, which could assist with the investigation process. In such cases, the Complainant agrees to waive their anonymity. If the Complainant wish to remain anonymous, we invite him or her to log on frequently to the online platform with the username and password provided by the IEA following the Complaint. This platform will enable the Complainant to communicate with the IEA or General Counsel and Corporate Secretary and answer all the questions required for the investigation, while remaining anonymous.

D. IEA & ORNGE DESIGNATED OFFICIALS

Ornge has engaged KPMG LLP, an independent accounting firm, to act as the IEA to receive Reports of Ethical Misconduct. The IEA reports directly to the Finance and Audit Committee ("**FAC**") Chair and communicates all activities

with General Counsel and Corporate Secretary. The IEA ensures the independence, neutrality, and fairness of all investigations of Ethical Misconduct (when conducted by the IEA). The IEA will involve General Counsel and Corporate Secretary to assist with resolving Complaints, as required.

E. CONFIDENTIALITY CLAUSE

Ornge is committed to ensuring the confidentiality of all Complaints. All Complaints will be treated with the utmost confidentiality and discretion. The identity of the Complainant or the details of the Complaint will not be disclosed without their consent unless required by law. Any individual who breaches this confidentiality obligation may be subject to disciplinary action.

4. INITIAL COMPLAINT RECEIPT:

When a Complaint is received by the IEA via email or telephone, the content of the information will be uploaded directly into the web based platform. Once the web platform is updated with a Complaint (either directly from a Complainant) or indirectly as mentioned above, an automatic notification is sent to the IEA and General Counsel and Corporate Secretary to inform them of the existence of a whistleblower activity report.

The IEA will perform an initial review of the Complaint and work with General Counsel and Corporate Secretary to determine if it involves a matter of Ethical Misconduct, as defined within this policy. If it does not meet the definition of Ethical Misconduct, the issue will be directed to the appropriate channel internally and the IEA will close the Complaint.

If the matter involves Ethical Misconduct, the IEA will:

- (i) Provide a username and password to the Complainant (if he or she desires), in order to connect to the web platform and follow up on the matter. This will allow the Complainant to communicate anonymously or otherwise with the IEA, and provide additional information or documents as needed.
- (ii) Be responsible for assessing every disclosure to determine if there is enough information to address the Complaint.
- (iii) Immediately send an email notification to General Counsel and Corporate Secretary alerting her as to the existence of a Complaint. If the Complaint specifically involves this role, then the said notification is escalated to the FAC Chair.
- (iv) Review the details of the Complaint and determine the investigative actions required and by whom.

For Complaints investigated under this Policy, the investigation may involve interviews with the Complainant, witnesses, the Respondent (and any other individuals that the investigator deems appropriate under the circumstances), the review of documents relevant to the Complaint, and potentially other procedures as deemed appropriate. All Complainants, witnesses and Respondents are required to co-operate fully in any investigation under this Policy and to respond to all questions posed by the investigator truthfully and fully and provide all relevant documents to the Complaint requested by an investigator.

5. REPORTER PROTECTION

A. GOOD FAITH

Anyone reporting Ethical Misconduct must do so in good faith and have reasonable grounds for believing the information they have reported is true. Any allegations that are unsubstantiated and are made maliciously or intentionally provide false information, or are motivated by ill will, hostility, malice, personal animosity, or dishonesty are considered to be made in bad faith.

B. REPRISALS

All Complaints made in good faith regarding Ethical Misconduct under this policy or any other reports of violations of other Ornge policies are encouraged and any reprisal or retaliation against any Complainant is forbidden. Reprisals include, but are not limited to:

- a) ending or threatening to end employment, a contractor or vendor relationship;
- b) disciplining or threatening to discipline;
- c) penalizing or threatening to penalize; or
- d) coercion and intimidation.

Anyone found to have engaged in a reprisal against a Complainant will be subject to disciplinary action, including the termination of their employment or engagement with Ornge.

C. BAD FAITH REPORTS

Anyone who files a Complaint in bad faith may be subject to disciplinary action, up to and including termination of employment or the termination any contractual relationship with Ornge.

6. ROLES AND RESPONSIBILITIES

Role # 1 - Board of Directors

The Board of Directors has approval authority and ultimate accountability for this Policy.

Role # 2: FAC

The FAC will provide oversight regarding any matters raised through the whistleblower policy and/or IEA; and recommend any revisions and changes of the Policy to the Board of Directors for approval.

Role # 3 - EMT

EMT is responsible for reviewing the Policy with a view to operational and administrative impacts across the organization and for endorsing the submission of this Policy to the FAC for review and approval for recommendation to the Board of Directors.

EMT means, collectively, the President and Chief Executive Officer, the Deputy Chief Executive Officer and Chief Operating Officer, the Chief Aviation, the Chief Medical Officer, the Chief Financial Officer, the Chief Human and Labour Relations Officer, and, the General Counsel and Corporate Secretary.

Role # 4: Chief Financial Officer

On an annual basis ensure the policy is reviewed at a minimum, once a year.

Role # 5 - IEA

The IEA will support the Finance and Audit Committee (FAC) with the administration of the whistleblowing mechanisms, assessing disclosures, reviewing Complaints and determining the investigative actions.

7. CROSS REFERENCES

- CORP-BULL-001 (Ornge Living Our Values)
- HR-POL-013 (Code of Conduct)
- OGC-POL-005 (Ornge Conflict of Interest Policy)
- HR-POL-008 (Workplace Harassment, Discrimination and Violence Policy)
- Other reporting avenues available on QPulse, under “Forms and Reports”

Examples include: Patient and Stakeholder Inquiries, Environmental Occurrence Report, Medication Broken or Loss Occurrence Report, Medication Safety Occurrence Report, Occupational Health and Safety Hazard/Occurrence Report etc.

Please forward any comments to:

Inna Kravitz

Chief Financial Officer

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