Policy Direction – Disclosure and Protection (Whistleblower) Policy

Rationale and Relationship to Vision, Mission, and Values

MS Canada adheres to the highest standards of ethical behavior, quality, transparency and accountability. We are committed to fostering and maintaining an environment where employees and volunteers (employees and volunteers) can work safely and appropriately, without fear of retaliation.

It is our expectation that employees and volunteers will practice honesty and integrity in fulfilling their responsibilities and to comply with all applicable laws and MS Canada policies.

Policy Objective

The objective of the Policy is to make clear the responsibility of all employees and volunteers to bring forward a reasonable belief that serious violation or wrongdoing has occurred or is about to occur within MS Canada and to provide a process by which such reasonable beliefs can be reported. It protects from reprisal those who come forward in good faith; it provides a fair and objective process to investigate those who are suspected of violation or wrongdoing and it protects the confidentiality of all involved in the disclosure process. This Policy direction is not intended to deal with harassment or discrimination issues, which are covered under MS Canada's Respectful Workplace & Environment – Anti-violence, Harassment, Bullying and Discrimination Policy Direction.

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

Policy Application

The Policy applies to all MS Canada employees and volunteers.

MS Canada – Policy Manual	
Applies to:	All volunteers and staff at all levels
Frequency of review:	Three years or less
First approved:	November 20, 2009 by Board of Directors
Last reviewed:	June 22, 2026
Next scheduled review:	June 2029

Authorization

The Policy was approved by the Board of Directors of the MS Society of Canada on November 20, 2009.

Definitions

Policy Details

It is the responsibility of all employees and volunteers to report suspected violations of legislation, related regulations and/or MS Canada policy directions, procedures and practices in accordance with this policy direction.

Serious violations or wrongdoings may include but are not limited to:

- The contravention of any federal or provincial law or related regulation;
- The misuse of MS Canada funds or assets;
- Unethical business practices;
- Damage to the reputation of MS Canada;
- An act or omission that endangers the life, health and safety of clients, employees and volunteers or others associated with MS Canada;
- Directing or counselling someone to commit a violation or wrongdoing.

Guidelines

Employees and volunteers who believe that they have witnessed an act or acts of wrongdoing should report the incident(s) immediately to the Appropriate Authority or the external whistleblower hotline. Any delays in reporting acts of wrongdoing can make the case against the Respondent more difficult to establish, and may even result in retaliatory acts by the Respondent.

If the Appropriate Authority, is alleged to have breached the policy direction, the President and Chief Executive Officer shall lead the investigation process. If the President and Chief Executive Officer is alleged to have breached the policy direction, the chair of the Board of Directors of MS Canada shall lead the investigation process with the VP, People and Community.

Receipt of Complaint

MS Canada seeks to resolve claims of wrongdoing in the workplace as expediently as possible. The Appropriate Authority, or appropriate alternate, is responsible for acknowledging receipt within 10 business days and determining and administering

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the methods and means for addressing and resolving complaints in an appropriate timeframe.

Anonymity and 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.

MS Canada 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. MS Canada will protect this privacy so long as doing so remains consistent with the enforcement of this Policy and adherence to the law.

Assurance Against Retaliation

This Policy encourages employees and volunteers to freely report – in a responsible and orderly fashion – their thoughts, opinions, and feelings regarding MS Canada wrongdoing complaints. Retaliation by the Respondent, or anyone acting on behalf of the Respondent, against the Complainant is strictly prohibited and will result in appropriate disciplinary action. Retaliation by the Respondent, or anyone acting on behalf of the Respondent, against any witness providing information about a workplace wrongdoing report, is also strictly prohibited. Acts of retaliation include (but are not limited to) interference, coercion, threats, and restraint.

This Policy will not be used to bring fraudulent or malicious complaints against employees and volunteers. Any complaint made in bad faith, if demonstrated as being such through convincing evidence, will result in disciplinary action being taken against the individual lodging the fraudulent or malicious complaint.

Executive Champion

The VP, People and Community, is the executive champion for the Disclosure and Protection (Whistleblower) Policy Direction and the related procedures.

Monitoring and Compliance

The executive champion is responsible for leading the monitoring of the application and compliance of this policy direction and the related procedures in conjunction with other members of the Executive Team (ET).

Related Policies, Legislation

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Other MS Canada policies that complement and support this policy direction include: Respectful Workplace & Environment – Anti-violence, Harassment, Bullying and Discrimination Policy Direction.

Policy Review

The policy direction is to be reviewed at a minimum every three (3) years following approval. The related procedures are to be reviewed every three (3) years or less by the Executive Team.

- Reviewed and approved November 2012
- Reviewed and approved February 2017
- Reviewed and approved May 2021
- Reviewed and approved June 2026

Definitions

Appropriate Authority - Any delegated MS Canada employee who has the authority to make final decisions regarding employees and volunteers, wrongdoing, harassment claims, and resulting actions. At MS Canada, the Appropriate Authority is the Vice President, People and Community.

Workplace - is defined as any location where any employee or volunteer of MS Canada is carrying out any MS Canada -related function.

Employees and volunteer - is defined as any employee or volunteer carrying out MS Canada's business on its behalf.

Complainant - Any person that submits a complaint or report of wrongdoing.

Respondent - Someone who's alleged conduct is the subject of a complaint.

Wrongdoing - Any illegal action or violation of company policy.

Executive Team - The most senior level of staff leadership within MS Canada comprised of the President and Chief Executive Officer; Senior Vice-President(s) and Vice-President(s). One person may hold more than one position. The President and Chief Executive Officer may alter the composition of the Executive Team as required from time-to-time.

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