

Integrity Assurance Policy

A. SCOPE/PURPOSE

1. This policy applies to all employees and all agents i.e. Officers and Directors of RTOERO, members of the Board of Directors, members of Advisory and Standing Committees and members of District Executives, (herein after referred to as “individual”) and pertains to alleged wrongdoing in the performance of RTOERO business or that of a local district.
2. This policy outlines the guidelines and procedures for informing the management of RTOERO or, where appropriate, RTOERO’s designated independent agency or legal counsel, to a possible serious violation of internal policies, procedures or external laws or regulations.

B. INTRODUCTION

1. In accordance with its Strategic Plan and Values, RTOERO is committed to conducting itself with honesty and integrity. Expectations of behaviours for members and staff are clearly outlined in the Code of Conduct; these reinforce and assure the highest ethical standards of integrity are maintained for the organization.
2. If at any time these standards of integrity are not upheld, RTOERO will seek to address such situations through this Policy. It provides assurance that individuals, (as defined in the Scope), have a confidential mechanism to report and have reviewed any suspected or actual inappropriate or unlawful misconduct affecting any facet of RTOERO’s operation.
3. RTOERO welcomes the reporting of such information and considers it essential to preserving its integrity, reputation and long-term viability. RTOERO is committed to compliance, by all individuals, with all applicable laws, regulations and internal policies.
4. When an individual expresses a concern or complaint that standards of integrity have not been followed, RTOERO will ensure that:
 - the individual disclosing the information will be encouraged to raise these concerns in good faith and be protected from reprisal;
 - all parties involved an investigation will be treated fairly and equitably;
 - confidentiality will be maintained; and,
 - if wrongdoing is confirmed, appropriate remedial and/or disciplinary actions will be taken.

5. In determining the appropriate course of action, employees should seek guidance from their respective manager or another member of the senior staff or they may choose to provide information anonymously/confidentially by contacting RTOERO's designated auditors or legal counsel through the process described herein. Individuals, other than staff, should seek guidance from the Chief Executive Officer (CEO) or designate or they may choose to provide information anonymously/confidentially by contacting RTOERO's designated auditors or legal counsel, as outlined in Section C.3. of this policy.

C. INFORMING MANAGEMENT OR AN INDEPENDENT AGENCY

1. Individuals must inform a member of the senior staff or RTOERO'S designated auditors or legal counsel herein if they have information which, in their best judgment, demonstrates the involvement of RTOERO or any individual(s) in any of the following:
 - A violation of one of RTOERO's policies;
 - A violation of any external law, rule, or regulation;
 - An unsafe work environment, or situation or circumstance which poses a threat to the health or safety of employees or the general public;
 - Corruption, fraud, or mismanagement of RTOERO resources; and
 - Questionable auditing or accounting matters.
2. Individuals who believe they have such information must inform the CEO/designate of RTOERO or the independent auditors (for matters relating to fraud, audit or accounting) or legal counsel (for other matters) as soon as possible in order for the organization to take action to quickly remedy the situation. Individuals should focus on providing facts in their disclosure, not simply speculation, and provide as much detail as possible to support a thorough investigation.
3. Individuals may contact their supervisor, a member of the senior management team, or their RTOERO contact, as appropriate, who will share with the CEO, unless the CEO is the subject of the expressed concern. Where it is not practicable, or when an employee is uncomfortable notifying a member of the senior management team, RTOERO has retained the services of two independent agencies:
 - a) the audit firm of Deloitte for matters relating to fraud, finance and audit, and
 - b) the legal firm of Keel, Cottrelle for the confidential and anonymous reporting of all other matters listed above.
4. The process for contacting the independent agency or law firm is outlined in Appendix "A" attached hereto. Appendix "B" is the form to be completed by an individual making a complaint.
5. Those disclosing information under this policy will be notified of the receipt of their complaint.

6. In appropriate situations, RTOERO's independent auditors and/or legal counsel may report issues to the senior management team, as well.

D. PROTECTION OF INDIVIDUALS DISCLOSING INFORMATION

1. Individuals who inform management or the independent agency of what they believe is a genuine serious contravention of internal policies, external laws or regulations will not suffer any negative repercussions for bringing the matter forward.
2. Attempts to intimidate or threaten an individual to prevent disclosure under this policy, or any retaliation or harassment of an individual following a disclosure made under this policy, are strictly prohibited and will be subject to remedial and/or disciplinary action, up to and including suspension from responsibilities or termination of employment.
3. Additionally, disclosures under this policy which are made in bad faith, or with the sole intent to be malicious, vindictive or merely disruptive will not be tolerated and will be subject to remedial and/or disciplinary action, up to and including suspension from responsibilities or termination of employment.

E. INVESTIGATIVE PROCESS

1. All information received under this policy will be thoroughly and promptly investigated.
2. Normally, this investigation will be conducted by the CEO (though outside resources may also be used where appropriate and expedient), except in any situation where the CEO is the subject of the disclosed information, in which case the investigation will be conducted by the Chair of the Board. Where the Chair of the Board is the subject of the complaint, the investigation will be conducted by the appropriate external agency.
3. The investigation will be completed as soon as possible after the receipt of the information so that the matter can be dealt with expeditiously. As appropriate, the subject of disclosed information will be given an opportunity to be heard prior to any discipline being imposed.
4. A report will be provided by the CEO/designate to the Board of Directors of the investigation's findings. These findings, as appropriate, may be shared with RTOERO's external legal counsel and/or the Chair of the Audit Committee (for fraud, audit, and accounting matters only).
5. During the investigation process, the identity of the individual disclosing the information will be kept confidential to the greatest extent possible and will be revealed only on a need-to-know basis or as required by law or court order.
6. In any case where the allegation is deemed to be without merit every effort will be made to limit revealing the name of the individual exonerated of any wrongdoing. In appropriate circumstances the individual cleared may be notified of an accusation that was determined to be baseless.

7. All information related to the disclosure that is deemed to have merit under this policy will be maintained in a confidential file for a period of six (6) years and will be subject to review by the CEO/designate.

F. RTOERO's RESPONSE TO INFORMATION RECEIVED

1. If the investigation confirms the allegations made in the disclosure under this policy, immediate steps will be taken to bring the individual/organization into compliance with the applicable law, regulation or policy. Unsafe working conditions will be promptly remedied and no work will be performed until it is safe to do so.
2. Where appropriate, RTOERO may also report any violations to external regulators or authorities.

G. REMEDIAL AND/OR DISCIPLINARY ACTION

1. Individuals who violate external laws or regulations or RTOERO's internal policies, or who knowingly fail to report such a violation, may be subject to remedial and/or disciplinary action, up to and including termination of employment.
2. The extent of the remedial action and/or discipline will be based on a number of factors, including but not limited to: the nature and extent of the violation, the intent of those involved, whether the violation was an honest mistake, whether reasonable efforts were made to avoid the violation or seek appropriate guidance before the violation occurred, and whether those involved reported the violation themselves.
3. Individuals who report their own violations will have that fact noted when remedial and/or disciplinary action, if any, is determined.

H. POLICY INTERPRETATION

The CEO and Legal Counsel are jointly responsible for all interpretations of this policy.

DATE of APPROVAL: March 2021

Appendix "A"

"POLICY COMPLIANCE HOTLINE"

RTOERO, as part of its Integrity Assurance policy, is providing a procedure for the confidential and anonymous reporting of suspected or actual violations in areas outlined in this policy. In an effort to offer our employees complete anonymity and confidentiality we have retained the audit firm of Deloitte (for fraud, finance and audit) and the law firm of Keel, Cottrelle (for all other matters) to monitor this procedure.

This service enables you to contact them by any of the methods below:

Keel Cottrelle LLP

36 Toronto Street, Suite 920

Toronto, Ontario

M5C 2C5

phone: 416-367-2900

fax: 416-367-2791

Deloitte

Bay Adelaide East

8 Adelaide Street West, Suite 200

Toronto, Ontario

M5H 0A9

Phone: 416-601-6150

Fax: 416-601-6151

Appendix "B"

CONFIDENTIAL DISCLOSURE REPORT FORM

RTOERO will treat all Disclosures by individuals as confidential and privileged to the fullest extent permitted by law. RTOERO will exercise particular care to keep confidential the identity of any individual making a Disclosure and the identity of the person against whom information has been made under this procedure until a formal investigation is launched. Thereafter, the identity of the individual making the Disclosure may be kept confidential, if requested, unless such confidentiality is incompatible with a fair investigation, unless there is an overriding reason for identifying or otherwise disclosing the identity of the individuals, or unless such disclosure is required by law. In this instance, the individual making the Disclosure will be so informed in advance of his or her being identified with the Disclosure. Where disciplinary proceedings are invoked against any individual following a disclosure under this procedure, RTOERO will normally require the name of the person making the Disclosure to be disclosed to the person subject to such proceedings.

RTOERO encourages individuals to put their name to any Disclosure they make, but any other individual affected may also make an anonymous Disclosure. In responding to an anonymous Disclosure, RTOERO will pay due regard to fairness to any individual named in the Disclosure, the seriousness of the issue raised, the credibility of the information or allegations in the Disclosure and the prospects of an effective investigation and discovery of evidence.

Investigations will be conducted as quickly as possible, taking into account the nature and complexity of the Disclosure and the issues raised therein.

Contact Information

Name

Telephone/Email

Do you wish to be contacted by the investigating officer regarding the status of the investigation? Yes No

Report

1. Individual(s) suspected of violation: _____

2. Date Complainant became aware of potential violation: _____

3. Date of this report: _____

4. Type of Violation: Legal
 Accounting/Auditing
 Retaliation

5. Violation is: Ongoing
 Completed
 Unclear which

6. Describe the relevant facts of the violation:

7. How did Individual become aware of the violation:

8. Actions taken by Individual prior to disclosing the information:

9. Who, if anyone, may be harmed or affected by the alleged violation?

10. Provide any suggestions for remedying the alleged violation:
