

Whistleblower Policy

Introduction

WPWDB conducts its business and works with employees, customers, suppliers and stakeholders in a manner which is lawful and ethically responsible. It will not tolerate attitudes or activities that constitute a breach of law or trust, or infringe employee rights. This policy formalizes WPWDB's commitment to enable employees to make fair and prompt disclosure of circumstances where the employee genuinely believes that any part of the WPWDB is engaged in inappropriate practices. This policy also includes a procedure that is the responsibility of the WPWDB's management to communicate effectively to all employees.

The WPWDB will support employees who bring to its attention any concerns of malpractice at the place of work, will protect the employee against victimization and will vigorously and thoroughly investigate allegations.

All employees are encouraged to report genuine suspicions or concerns about practices, which it is believed conflict with the principles set out above or which fall into any of the Qualifying Disclosures contained below.

Policy

The WPWDB is committed to upholding high standards of honesty and integrity, which it expects to exist throughout the organization. In order to maintain these standards, the WPWDB has implemented this procedure intended to encourage employees who wish to make a disclosure in good faith and to take that step knowing that they will be supported by the WPWDB. The WPWDB believes that it is not in the best interest of employees to remain silent on becoming aware of improper activities taking place at work. It takes all

malpractice very seriously and has prepared this procedure so that concerns can be reported, knowing that treatment will be fair and will be listened to by someone who will take seriously genuine concerns.

Qualifying Disclosures

It is expected that any disclosure will be made in good faith and the informer must believe that one of the following has, or is likely to happen:

- The committing of a criminal offence.
- Breach of a legal requirement (this could be a contractual or civil obligation).
- Breach of a WPWDB policy or procedure.
- Any action likely to impact the health, safety, human rights or wellbeing of an individual or group of people.

The WPWDB would rather that employees report a concern even if they are not sure that it falls into the above categories. Any report made in good faith will be fully investigated. The employee will receive full protection and support from senior management and the WPWDB, regardless of the outcome of any investigation. The WPWDB's policy is about maintaining honesty and integrity; however, employees should be aware that a false report submitted deliberately, maliciously or for personal gain might result in a disciplinary action.

Procedure

Employees are to make their disclosures to the Vice Chairman of the WPWDB. If the Vice Chairman is unavailable, the disclosure is to be forwarded to the Chairman of the WPWDB. Disclosures may be made either in writing or by speaking with the Vice Chairman or Chairman, who is expected to conduct the investigation. The person performing the investigation must not have any direct interest in the subject matter of the disclosure; if this is not the case, the Chairman will need to assign an appropriate WPWDB member to conduct the investigation.

If the allegations made involve another person employed by the WPWDB, the person who allegations have been made against will be interviewed and given full opportunity to give an explanation of the circumstances. If the allegations involve third parties outside the Center, the investigator must decide promptly how to proceed. The investigation will consider all the facts and shall determine in good faith whether the disclosure is legitimate and has been made honestly and in good faith.

The investigator will prepare a formal report and the findings will be communicated to the disclosing employee, the person against whom an allegation has been made (if it is another person employed by the WPWDB), and the Chairman of the WPWDB. The report will include a recommendation as to whether a regulatory body or the public need to be informed of the disclosure and the findings of the investigation; this decision will be made by the Chairman of the WPWDB in concert with the investigator.

When the investigator believes involvement of the police or regulatory authorities cannot await production of a formal report, this will be discussed with the Chairman of the WPWDB; and a decision about when and how to involve them will be made promptly.

Investigations will be conducted promptly and fairly with due regard for the nature of the allegation and the rights of the people involved in the allegation. Evidence or any materials, documents or records will be held by the investigator and held securely.

In the event that the investigation concludes that disciplinary action is necessary, the CEO will conduct this in accordance with existing policies and procedures after a review of the formal report.

An employee who feels victimized or to have suffered any detrimental treatment as a result of making a disclosure should contact the Vice-Chairman of the WPWDB, who will review the situation and make a recommendation to the Chairman of the WPWDB. The Chairman will have the final decision on any action to be taken.

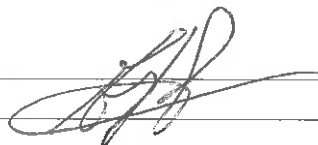
This procedure will be displayed on WPWDB's policy and procedures page of the website; and copies of it will be made available to employees on request.

I have read and understand the WPWDB Whistleblower Policy:

Signature

Date

Approval Signature:



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