

Safe Disclosure Policy

Policy Type: Governance Process

Policy Number: #121

Date Approved: 11 December 2006

Dates Amended

Philosophy

The Victoria Airport Authority is committed to maintaining the highest standards of honest, ethical and legal conduct and, accordingly, will investigate any possible fraudulent or dishonest use or misuse of its resources or property by management, employees, officers or directors and will also investigate any other form of illegal, dishonest, fraudulent or unethical conduct or activity.

Purpose

The purpose of the Safe Disclosure Policy is to emphasize the importance of legal and ethical behaviour in everything done on behalf of or by the Victoria Airport Authority.

Anyone who may become aware of any illegal, unethical, fraudulent or dishonest conduct or activity that involves the Victoria Airport Authority is encouraged to come forward and disclose their concern without fear of recrimination or other adverse consequences.

Nothing in this Policy shall either amend or replace the provisions of the Collective Agreement between the Victoria Airport Authority and the Public Service Alliance of Canada or discrimination or harassment matters based on prohibited grounds as set out in statute.

Reporting

An employee who reasonably believes illegal, unethical, fraudulent or dishonest conduct or activity involving the Victoria Airport Authority has or is occurring is expected to discuss this belief either with the President and CEO or if that is not appropriate then the employee should report the belief to the Chair of the Victoria Airport Authority.

Investigation and Reporting

The Victoria Airport Authority will treat all disclosures made under this Policy in as confidential a manner as possible.

The CEO will advise the Board of Directors of the nature of the reports received under this Policy, the results of any investigation, and action taken in response to the perceived illegal, unethical, fraudulent or dishonest conduct or activity, any follow up action required and report upon the follow up action as directed by the Board of Directors.

The Chair of the Victoria Airport Authority will arrange for an investigation of any reports referred to him or her under this Policy and will report to the Board on the results of the investigation.

Safe Disclosure

Any person who, in good faith and with a reasonable belief, reports perceived unethical, illegal, fraudulent or dishonest or activity will not suffer from any harassment, threats, retaliation, discipline, penalty, discrimination or contractual consequences as a result of the disclosure.

If the reporting person suffers any adverse consequences flowing from the disclosure that person may report in the same manner as indicated above and this will also be investigated and reported upon, both to the Board of Directors and to the person who initially made the disclosure.

Reports must be made in good faith. Good faith is defined as a report made without malice or a consideration of personal benefit and with a reasonable belief that the report is true.

Reporting Illegal Conduct to Law Enforcement Agencies

This policy is not intended to discourage anyone from reporting illegal behaviour to any law enforcement agency.