



Safe Disclosure Policy

Created	Last Revised
October 1, 2023	

Policy Statement

Grenville Mutual Insurance is committed to integrity and ethical behaviour in the workplace and will foster and maintain an environment where employees and Directors can work safely and appropriately, without fear of retaliation.

This policy has been adopted to ensure that all employees and Directors understand that they may report any wrongdoing that may adversely impact the Company, the Brokers, the Agents, our Policyholders, employees, or the public at large, without fear of retaliation or a negative impact on their employment status at Grenville Mutual Insurance.

Scope

This policy applies to all permanent and temporary employees and Directors at Grenville Mutual Insurance.

Definitions

“Appropriate Authority” means: Any delegated employee who has the authority to make final decisions regarding employees, wrongdoing, harassment claims, and resulting actions. At Grenville Mutual Insurance, the Appropriate Authority is the **President & CEO**. In the event that the breach involves the President & CEO, the Chair of the Board is the contact for reporting.

“Complainant” means: Any person that submits a complaint or report of wrongdoing.

“Respondent” means: Someone who's alleged conduct is the subject of a complaint.



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“Wrongdoing” means: Any illegal action or violation of company policy. Violations that can be reported are, but not limited to, the following:

- Breaching the Grenville Mutual Insurance Conduct of Business Conduct
- Misusing company funds or assets
- Financial statement disclosure issues, accounting, internal accounting controls, auditing matters
- Doing something or failing to do something that creates a significant and specific danger to the health or safety of persons or to the environment
- Conduct which can reasonably be believed to be a violation of employment or labour laws
- Any illegal, fraudulent, or unlawful activities

“Retaliatory Acts” means: Retribution, or reprisal against any Complainant as a result of their reporting an incident of wrongdoing, or against any employee or Director that participates in an investigation relating to the allegation of wrongdoing.

“Adverse Employment Action” means: Any demotion, suspension, termination, unfavourable transfer, denial of promotion, denial of benefits, threat, harassment, or denial of compensation as a result of the reporting of wrongdoing, or any manner of discrimination against an employee in the terms and conditions of employment because of any other lawful act done by the employee pursuant to this policy, or any applicable Canadian legislation.

Responsibilities

The **Appropriate Authority** is responsible for ensuring an investigation of any complaint submitted in a timely manner.

Employees and Directors are responsible for:

- Ensuring that they bring forth any complaints they may have to the Appropriate Authority immediately.
- Ensuring that the workplace is free from all forms of discrimination, harassment, violence and retaliation prohibited by this policy.

No employee or Director of the company has the authority to engage in any conduct prohibited by this policy



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Individuals who believe they have witnessed an act or acts of wrongdoing should report the incident(s) immediately to the President & CEO [Appropriate Authority].

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.

It is a violation of the Grenville Mutual Safe Disclosure Policy for anyone to knowingly make a false complaint of wrongdoing or to provide false information about a complaint.

Individuals who violate this Policy are subject to disciplinary and/or corrective action, up to and including termination of employment.

Procedure

Report Obligations – Employees

Employees who believe they have witnessed wrongdoing in their working environment are advised to report the incident(s) or retaliation to the Appropriate Authority.

Report Obligations – Managers

Managers are directed to take all appropriate steps to prevent and stop wrongdoing in their areas of responsibility. Any Manager who is subjected to, witnesses, or is given written or oral complaints of wrongdoing or retaliation shall immediately report it to the Appropriate Authority.

A Manager who is contacted by an individual seeking to file a complaint about wrongdoing in their department shall assist the complainant in contacting the Appropriate Authority.



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Investigation

Grenville Mutual Insurance seeks to resolve claims of wrongdoing in the workplace as expediently as possible. Investigations shall be conducted, and the appropriate actions taken no longer than 10 days following the filing of a complaint.

The Appropriate Authority is responsible for determining and administering the methods and means for addressing complaints. The Appropriate Authority is also responsible for:

- Determining the accuracy of allegations of wrongdoing or retaliation.
- Determining whether or not a reported act is indeed wrongdoing.
- Administering punitive or corrective actions if allegations are true.
- Administering punitive actions if allegations were knowingly falsely made.

Wherever and whenever investigations are conducted, this Policy asserts that Complainants and Respondents have certain rights. These rights include, but are not limited to:

- Receiving written notice of the allegations (where permitted by law).
- Presenting relevant information to the Appropriate Authority.
- Receiving a copy of the report at the conclusion of the investigation (where permitted by law).

At the conclusion of an investigation, the investigator must create a written report including a statement regarding any and all findings that have been proven, and a statement of decision on whether or not the Policy has been violated. The report shall be presented for review to any/all appropriate authorities and/or legal counsel, as appropriate.

Report Handling Procedures

The Appropriate Authority shall advise the Complainant and the Respondent of the resolution of any investigation conducted under this Policy. A copy of the investigative findings shall be provided in writing to the Complainant and the Respondent.



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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.

Grenville Mutual Insurance 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. Grenville Mutual 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 to freely express – in a responsible and orderly fashion – their thoughts, opinions, and feelings regarding workplace 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 Safe Disclosure Policy will not be used to bring fraudulent or malicious complaints against employees. 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.

Procedures for Handling Complaints of Workplace Wrongdoing

Once the Complainant lodges a complaint with the Appropriate Authority, a discussion will take place that shall be kept confidential, to the extent allowed by the law. If desired by the Complainant, no written record will be kept of this initial discussion. During this discussion, the recipient of the complaint will explain all options available to the Complainant (See Option #1 and Option #2 below). If the Complainant wished to proceed further with their complaint, the Complainant must then provide a written statement regarding the alleged workplace wrongdoing.



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Option #1 - Informal Procedures:

The Appropriate Authority may notify the Respondent of the complaint, keeping all such communication confidential. The Appropriate Authority may then implement whatever steps necessary to create an informal resolution that is acceptable to both the Complainant and Respondent.

If an informal resolution of the complaint is achieved, no record of the complaint will be entered in the Respondent's employee records. However, the Appropriate Authority will record the occurrence of the complaint and the informal resolution achieved. Again, this record will remain confidential.

Option #2 - Formal Procedures:

In the case of formal complaints, the Respondent shall have 10 working days to respond, in writing, to the allegation. The Respondent's statement, written on company letterhead, must answer – with specific responses – to each complaint, either admitting, denying, or explaining the allegations against them. The Respondent must sign their statement, which will then be attached to the original complaint.

If a formal hearing is warranted, the Appropriate Authority will conduct a hearing within 15 working days after receiving the request.

Disciplinary Actions

Upon concluding that an instance of workplace wrongdoing has indeed occurred, the Respondent will be subject to disciplinary action, which may result in suspension of duties, or outright termination of employment and possible legal action depending on the severity of the action. Disciplinary actions imposed by the Appropriate Authority will be determined on the basis of the facts of each case and the extent of harm to Grenville Mutual Insurance interests and business goals.



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Timelines

Complainants are always encouraged to file a complaint immediately after an alleged incident of workplace wrongdoing. Nevertheless, Grenville Mutual Insurance is aware that such timely response may not always be possible, due to feelings of fear on the Complainant's part. Individuals who believe that they have witnessed workplace wrongdoing should lodge a complaint within 10 working days following an alleged incident. Under extreme circumstances, this timeline may be extended to 20 working days at the request of the Complainant; however, it is the responsibility of the Complainant to show good reasons for this extension.

Records

Records of all formal and informal resolutions, hearings, reviews and findings report will be kept by the Appropriate Authority, for a minimum of 5 years or for as long as any administrative or legal action arising out of the complaint is pending except where otherwise stated in this Policy.

The records will only be available to managerial members of the appropriate department, and only in the following circumstances:

- When determining an appropriate disciplinary action for subsequent workplace wrongdoing complaints.
- When a Respondent is a candidate for a promotion to a supervisory position.
- When a complaint against retaliatory action is made.
- When a decision or resolution is reviewed.

Any records concerning employees will be maintained in accordance with all applicable laws and regulations. Both the Complainant and the Respondent are eligible to obtain copies of hearings or of their own statements made throughout the course of the investigation.

Responsibilities of Audit Committee with Respect to Specified Complaints

The Appropriate Authority will inform the Grenville Mutual Insurance Audit & Finance Committee of all complaints and concerns regarding accounting and auditing matters.

The Audit & Finance Committee will take all complaints and concerns regarding accounting and auditing matters seriously and be apprised of any investigation and outcomes. Documentation regarding the investigation shall be created and retained.