

### **Purpose**

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The purpose of this whistleblower policy is to provide direction to all current and former directors, employees, contractors, subcontractors, agents, volunteers, landowners, vendors, donors, and partners of Ducks Unlimited Canada regarding the communication of concerns on questionable financial or operational matters.

### **Defined Terms**

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#### **The Company**

For the purpose of this policy the "Company" is meant to be Ducks Unlimited Canada (DUC) and includes all of its locations across the country.


#### **The Whistleblower**

For the purpose of this policy the "Whistleblower" is meant to be any director, employee, contractor, subcontractor, agent, volunteer, landowner, vendor, donor, members of the general public or partner of the Company who has reported a whistleblower incident.

#### **Whistleblower Incident**

A "whistleblower incident" is defined as a concern related to the Company's financial or operational matters.

For greater clarity, whistleblower incidents are intended to include, but are not limited to, the following:

- Changing work from one project to other projects to stay on budget;
  - "Side deals" or "under the table" dealings with contractors for personal benefit;
  - Receiving personal kickbacks or significant gifts (over \$100) from contractors or vendors which could create bias in the tendering process;
  - Inappropriate recording or reporting of revenues, or lack thereof;
  - Inappropriate classification of assets and/or liabilities;
  - A deliberate disregard or circumvention of Company policies;
  - Embezzlement of Company assets by an individual or group of individuals;
  - Inappropriate occurrences at a Company event; and
  - Inappropriate projects for the benefit of a landowner or business, and not necessarily in the Company's interest.
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## Policy Statements

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It is the policy of the Company that the Whistleblower must immediately communicate *whistleblower incidents* as soon as the Whistleblower becomes aware of such situations.

*Whistleblower incidents* shall be communicated using the Company's prescribed procedures for the submission of *whistleblower incidents*.

It is the policy of the Company that the Whistleblower will not be discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against as a result of communicating a *whistleblower incident*. Any DUC employee found to be in violation of this policy will face disciplinary action. Continued violation of this policy (i.e. continued harassment of the Whistleblower) may result in termination of employment.

The Company will not protect a Whistleblower who intentionally makes false accusations in reporting of a *whistleblower incident*.

It is the policy of the Company to treat all *reported whistleblower incidents* in a confidential and sensitive manner. In addition, the Whistleblower shall be provided the opportunity to remain anonymous.

## Applicability

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This policy applies to all current and former directors, employees, contractors, subcontractors, agents, volunteers, landowners, vendors, donors, and partners of the Company.

## Available Resources

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Procedures to enable the communication of *whistleblower incidents* can be accessed on the Ducks Unlimited Canada website at: <http://www.ducks.ca/aboutduc/beliefs>

Questions relating to the whistleblower policy should be directed to:

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