



Disclosure of Wrongdoing Policy

Date

EFFECTIVE DATE: July 10, 2014

LAST VERSION: January 1, 2023

Context

The Bank of Canada (Bank) fosters a 'speak up culture' in which we encourage open communication where issues and concerns are addressed as they arise.

This policy and the [Disclosure of Wrongdoing: Process and Procedures](#) document set out how employees can confidentially raise serious concerns about [wrongdoing](#) in the workplace without fear of [reprisal](#). Employees who have reasonable grounds to believe that another person has committed or is about to commit a wrongdoing in the workplace should promptly disclose information concerning the wrongdoing.

This policy is consistent with the requirements of the [Public Servants Disclosure Protection Act \(PSDPA\)](#) to which the Bank is subject and Bank employees are public servants under PSDPA.

Policy Statement

This policy is based on the following principles:

- Employees who come forward in good faith within the context of this policy will be treated fairly and are protected from [reprisal](#) even if mistaken.
- The identity of employees making disclosures, witnesses and employees alleged to be responsible for the [wrongdoing](#) will be treated as confidential and protected in accordance with the law.
- All allegations of wrongdoing will be promptly acknowledged, provided the employee has self-identified, and assessment will commence as soon as possible.
- If the employee who raised the concern about the wrongdoing is known, the results of the investigation will also be shared with this employee.

Scope

This policy applies to all employees of the Bank who wish to report a [wrongdoing](#) as defined below, that cannot be or have not been addressed by other Bank policies and processes.

What is a Wrongdoing?

A wrongdoing is defined as:

- the contravention of an Act of Parliament or of the legislature of a province, or of any regulations made under any such Act;
- the [misuse of public funds or assets](#);
- [gross mismanagement](#) in the federal public sector, which includes the Bank;
- a [serious breach](#) of the Bank's [Code of Business Conduct and Ethics](#) and policies;
- an act or omission that creates a substantial and specific danger to the life, health and safety of persons or the environment, other than a danger that is inherent in the performance of the duties or functions of an employee; and
- knowingly directing or counselling a person to commit a wrongdoing.

Judgment calls that result from a balanced and informed decision-making process are not considered wrongdoing within the scope of this policy.

Your Role

- Become familiar with this policy.
- Seek advice when you have reasonable grounds to believe that another person has committed or is about to commit a serious [wrongdoing](#) in the workplace.
- Understand the choices in making a protected disclosure and where to get related information and advice.
- Follow the procedures for disclosure as outline in the [Disclosure of Wrongdoing: Process and Procedures](#) document.
- Do not make trivial or vexatious disclosures.
- Cooperate and assist in the conduct of a review or investigation.
- Respect confidentiality during and following the disclosure process.

What is a Reprisal?

A reprisal is defined as any measure taken against a person who has made a disclosure in good faith under this policy, or has cooperated in an investigation of such a disclosure that adversely affects the person's employment or working conditions, including:

- any disciplinary measure
- demotion
- termination

- threats of any of the above actions

Protection from Reprisals

Employees who are making a disclosure are encouraged to identify themselves because, in the event of a concern communicated anonymously, it will not be possible for the employees to be subsequently contacted, whether for clarification or to be informed of the results of the investigation.

Reprisals are strictly prohibited under the *Public Servants Disclosure Protection Act (PSDPA)*. The PSDPA protects public servants who disclose **wrongdoings** reported in good faith from reprisals. Violations of the prohibitions can result in severe penalties.

See [Section 2: Reprisals of the Process and Procedures](#) for more information regarding protection from reprisal as well as a list of contacts employees who believe they have been the victim of reprisal can go to for advice.

Reporting a Wrongdoing

Disclosing internally

- Employees may communicate directly with the Bank's **General Counsel and Corporate Secretary** regarding instances of **wrongdoing**. See the [Process and Procedures](#) for details.
- If it is not appropriate to approach the Bank's General Counsel and Corporate Secretary, employees may communicate with the **Chair of the Audit and Finance Committee** of the Board of Directors of the Bank of Canada with their concern. See the [Process and Procedures](#) for details.
- If you become aware of known or suspected cases of fraud or misappropriation of Bank assets, you may also communicate your concern directly to the **Chief Internal Auditor** or to **the Chair of the Audit and Finance Committee**.

For more information on [how to report a wrongdoing](#) consult [Section 4: Reporting a Wrongdoing of the Process and Procedures](#).

You can [submit a report of wrongdoing](#) by completing the [Disclosure of Wrongdoing Reporting Form](#).

External recourse for disclosures

- Alternatively, an employee may make a disclosure of **wrongdoing** to the [Public Sector Integrity Commissioner \(PSIC\)](#). When an employee makes a disclosure to the PSIC, the Commissioner will investigate the alleged wrongdoing, report findings and make recommendations on corrective measures to the Governor of the Bank.

Disclosures regarding potential wrongdoings in another organization in or relating to the public sector should be referred to the [Public Sector Integrity Commissioner \(PSIC\)](#).

After You Report

All allegations of [wrongdoing](#) will be acknowledged provided the employee has self-identified.

Once you have submitted your report you can expect the following:

Review and Assessment

- The General Counsel and Corporate Secretary or Chair of the Audit and Finance Committee of the Board of Directors will refer any allegations to the [Triage Committee](#) and the Board of Directors respectively, who will determine if there are sufficient grounds for further action.
- Your identity will be kept confidential and only disclosed to parties involved in the investigation and related processes who are subject to strict confidentiality requirements.
- You will be informed of the decision to investigate your report.

Investigations

- Investigations are conducted in an impartial and fair manner and in accordance with the principals and procedures described in the [Internal Investigations Standard](#).
- If your report is investigated, you may be contacted for further information or clarification and may be required to participate in the investigation.

Report and Recommendations

- Once the investigation is complete a report of the results of the investigation will be submitted in accordance with the principals and procedures described in the [Internal Investigations Standard](#).

Further Advice and Guidance

For enquiries related to this policy, contact the Compliance and Ethics Office.

Tel.: 613-782-8100

Email: compliance-conformite@bank-banque-canada.ca.

Related Links

[Disclosure of Wrongdoing - List of Designated Contacts](#)

[Disclosure of Wrongdoing: Process and Procedures](#)

[Code of Business Conduct and Ethics](#)

[Internal Investigations Standard](#)