



RIGHT TO PLAY
PROTECT. EDUCATE. EMPOWER.

Whistleblower Policy

Version #002

Department: People & Culture	Position Accountable: Chief People Officer
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Purpose

The purpose of this Policy is to protect Beneficiaries, Team Members, and Partners by making available and encouraging the use of whistleblowing channels to ensure that Right To Play will be able to investigate any misconduct and take corrective action.

Right To Play's Commitment

Right To Play International ("Right To Play") is committed to providing Beneficiaries, Team Members, and Partners with a Workplace in which they have the support and safety needed in order to report concerns regarding suspected or actual misconduct. The purpose of this Policy is to provide Right To Play's Beneficiaries, Team Members, and Partners with mechanisms that they can use in order to raise these concerns.

Scope

This policy applies to all Right To Play Employees, Volunteers, Interns, Consultants, and representatives* (hereinafter collectively referred to as "Team Members") working with Right To Play International and its National Offices, Country Offices, and Headquarters (hereinafter collectively referred to as "Right To Play").

All Team Members have an ongoing obligation to immediately report any activity or suspected activity which might be prohibited according to Right To Play's International Code of Conduct, policies or applicable law, or might otherwise be damaging to the reputation of Right To Play. This obligation applies to situations that Team Members have experienced, witnessed, heard from other individuals or otherwise have knowledge of. Examples of situations that must be reported include:

- Any concern that a Team Member or Partner has committed an action characterized as discrimination, harassment, sexual harassment, bullying, sexual misconduct or violence;
- Any concern that a Team Member or Partner has committed a dangerous practice likely to cause physical harm or damage to any person or property;
- Any abuse of power or authority committed by Team Members or Partners;
- Any conflict of interest that Right To Play, Team Members or Partners might be experiencing, whether consciously or unconsciously;
- Any instances of fraud, defined as the misappropriation of organizational assets or the misrepresentation or misuse of financial or other forms of information for personal gain.
- Any retaliation or attempt of retaliation regarding any report, complaint or other disclosure made pursuant to this Policy, and
- Any other inappropriate actions or behaviors conducted by Team Members or Partners.

Reporting Complaints and Concerns

Any Beneficiary, Team Member or Partner may submit any complaint or concern to Right To Play through the following channels:

- Any Manager or member of People and Culture;
- Online, through a confidential, anonymous website at www.clearviewconnects.com;
- Canada or USA: over the phone through the Right To Play Canada/US dedicated toll-free number: 1-866-921-3463;
- All Other countries: over the phone through the Right To Play International Collect Call number: +1 905-323-4617; or
- By mail through the confidential post office box at: Clearview Connects, P.O. Box 11017, Toronto, Ontario, M1E 1N0.

When making a complaint or concern, individuals are encouraged to provide as much specific information as possible including names, dates, places, events, and reasons why this incident may be a violation of Right To Play’s Code of Conduct, policies or applicable law.

Self-reporting of Violations

Right To Play encourages its Team Members and Partners to disclose their own violation of Right To Play’s Code of Conduct, policies or applicable law. In the case of Team Members and Partners who self-report a violation, Right To Play will work with them to deal with the problem created by the conduct as required or permitted by applicable law.

Confidentiality

This policy does not guarantee absolute confidentiality. However, Right To Play will keep all complaints confidential to the extent possible while still fulfilling its obligation to investigate and take any corrective action. Disclosure of information obtained through the complaint will happen only when necessary for Right To Play to fulfill its obligation to investigate, take correct action, or as is otherwise required or permitted by applicable law.

Internal Investigation Process

Right To Play takes all complaints seriously and will investigate and deal with all incidents in a fair and timely manner. All Team Members and Partners are expected to offer full support to investigations when required.

Right To Play maintains a confidential reporting channel and should Team Members or Partners wish to report an incident involving a member of the Executive Team all reports marked “sensitive” are channeled to the Board.

Retaliation

Right To Play has zero tolerance for any form of retaliation against individuals who report incidents in good faith or participate in investigations. Any Beneficiary, Team Member, or Partner who, in good faith,

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makes a complaint will be protected from any type of retaliation. Any Team Member of Partner who retaliates against someone who has made a good faith report is subject to disciplinary action, including termination of office, employment or appointment. Any acts of retaliation should be immediately reported to Right To Play.

Compliance with Applicable Law

This Policy and Program will comply with the local law applicable to each Workplace. Nonetheless, Right To Play may consider a Team Member or Partner's behavior to be in violation of this Policy even if the local law does not consider the given behavior or action to be unlawful.

Distribution

Right To Play will provide all Team Members with a copy of this policy. The Team Member's supervisor will answer any questions of the Team Member to ensure a proper understanding of the policy.

At commencement of employment each Team Member signs the prescribed form of acknowledgment. The People and Culture representative will retain this form.

In addition, in cases where, as an alternative to employment, an individual:

- Is engaged under contract to provide services to the organization
- Has managerial or supervisory responsibilities, or
- Deals on the organization's behalf with government officials, or
- Has access to confidential information

Such individuals will be provided with a copy of this policy and shall sign the prescribed form of acknowledgment. In connection with the provision of services to the organization, this policy shall apply to such individuals fully as if they were a Team Member of Right To Play.

Management & Accountability

Responsibility of Team Members:

- (a) Understand and comply with this Policy and related procedures;
- (b) Participate in training programs related to this Policy;
- (c) Promptly report any incidents or complaints pursuant to this Policy;
- (d) Fully cooperate in investigations of incidents or complaints related to this Policy; and
- (e) Keep confidential any information regarding the claims, reports or the investigation process.

Responsibility of Managers:

- (a) Provide information and instruction on the contents of this Policy through completion of applicable training;
- (b) Report any information or claim received from others regarding misconduct within 24 hours from the moment the Manager becomes aware of it;
- (c) Encourage Team Members to report incidents and complaints related to this Policy; and

- (d) Keep confidential any information regarding claims, reports or the investigation process.

Responsibility of Right To Play:

- (a) Communicate and provide training on this Policy to all Team Members;
- (b) Develop and maintain a program to implement this Policy;
- (c) Track, monitor, investigate and deal with all claims and reports in a fair and timely manner;
- (d) Prepare an annual accountability report regarding incidents or complaints related to this Policy to be shared with the International Board of Directors
- (e) Keep confidential any information regarding the claims, reports or the investigation process.

Responsibility of Partners:

- (a) Comply with this Policy and with all related processes and procedures of Right To Play;
- (b) Provide full collaboration to investigation processes, including providing all relevant information and participating in interviews.

Definitions

1. **Beneficiary:** A person, 18 years or older, who is either directly or indirectly engaged in a Right To Play program and who benefits from the activities of the program (e.g. parents, teachers, community members). Please refer to the Child Safeguarding Policy for rules and procedures regarding individuals who are younger than 18 years.
2. **Manager:** A Team Member who has direct reports or whose position is Manager or higher.
3. **Partner:** A person or organization that provides services, has partnerships or engages with Right To Play, including consultants, volunteers who are part of another organization, athlete ambassadors and implementing partners.
4. **Team Member:** A person who works or volunteers for Right To Play and reports directly to this organization. Includes employees, board members, interns and volunteers.
5. **Workplace:** Any land, premises, location or thing in which Team Members work or interact as part of a professional context. The Workplace includes circumstances and conducts that have work-related implications, repercussions or have the potential to affect the reputation of Right To Play regardless of whether it occurred during or after work hours (e.g. field trips, holiday parties, texting, and social media posts).

References

- International Code of Conduct
- Safeguarding Policy
- Gender Equality Policy
- Beneficiary Protection Policy
- Sexual Misconduct Policy
- Harassment and Violence Policy and Program