

Whistleblower Protection Policy

All staff and representatives of EDF are expected to maintain high standards of ethics in the conduct of their duties and responsibilities. As employees and representatives of EDF, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable policies, laws and regulations. When we are not sure of the right conduct in a given situation, it is always advisable to discuss the situation with your supervisor, the Director, President and Chair or secretariat focal point for the committees.

Reporting Responsibility

This Whistleblower Policy has been developed to ensure that all employees and representatives or members, can raise serious concerns internally so EDF can address and correct conduct and actions which are in conflict with our Code of Conduct or our values. It is the responsibility of all committee members, board members, staff and EDF members to report concerns about violations of EDF's code of conduct or suspected violations of policies, laws or regulations that govern EDF.

No Retaliation

It is contrary to the values of EDF for anyone to retaliate against any committee member, board member, staff or EDF member, who in good faith reports a code of conduct violation, or a suspected violation of law, such as a complaint of discrimination, suspected fraud, or suspected violation of any regulation governing the operations of EDF. Any EDF representative, including staff members, elected official and committee members, who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

EDF has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your

supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Director. If you are not comfortable speaking with the Director or you are not satisfied with the Director's response, you are encouraged to speak with the President.

Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the EDF Director, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Director or the President.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

EDF's Director will notify the person who submitted a complaint, acknowledge the receipt of the reported violation or suspected violation, and provide the person information on the forthcoming measures and foreseen timeframe. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. All investigative and corrective measures will be conducted in a reasonable timeframe without undue delays. During this time, the person who submitted a complaint will have the right to receive updates regarding the process of investigation and corrective action upon request. Regular updates will be provided to the person by the Director with the frequency agreed by the person and the Director.