

**Approval Date:** November 1, 2025

### Scope

This policy applies to all WCMRC employees and managers, contractors and consultants, suppliers and service providers, and members of the public who wish to report a significant wrongdoing.

### Purpose

Western Canada Marine Response Corporation (“WCMRC”) is committed to fostering a culture of ethical conduct, accountability, and transparency. This Ethics & Integrity Policy provides a safe and confidential mechanism for reporting suspected or actual misconduct or wrongdoing without fear of retaliation.

This policy reinforces our obligations as a federally regulated marine response organization and aligns with applicable legislation, including the Public Servants Disclosure Protection Act (PSDPA), and other prevailing industry standards.

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### Integrity

At WCMRC, we uphold unwavering ethical standards and transparency, ensuring our actions align with our words, building trust, and reinforcing our reputation for reliability.

### Guiding Principles

WCMRC believes that strong reporting mechanisms are essential to maintaining accountability, integrity, and trust. This policy ensures that:

- Individuals can report concerns safely and confidentially.
- Reports are treated objectively and with respect.
- Retaliation against anyone who raises a concern in good faith is strictly prohibited.

Wrongdoing may include, but is not limited to:

- Violations of federal or provincial law or regulation
  - Acts or omissions that pose danger to health, safety, life, or the environment
  - Fraud, theft, or misuse of company funds or assets
  - Serious or systemic harassment, discrimination, or workplace violence
  - Serious breaches of company policies or ethical codes
  - Retaliation against whistleblowers
  - Knowingly directing or influencing others to commit wrongdoing
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## How to Report a Concern

WCMRC encourages individuals to report concerns as soon as possible. If you are a WCMRC employee, you may report directly to your supervisor, manager, or Human Resources.

If you prefer to remain anonymous or independent of internal channels, you can report 24 hours a day through WCMRC's secure, third-party reporting service.

 **Hotline:** 833-740-5892

 **Online:** [wcmrcmobile.ethicspoint.com](http://wcmrcmobile.ethicspoint.com)

Reports are received directly by the Designated Recipients, typically the Director of Human Resources, or in the event of a conflict, the Director Safety & Compliance and/or the Director, Public & External Relations.

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## Protection Against Retaliation

WCMRC prohibits reprisals against any individual who, in good faith, reports a concern or cooperates with an investigation. Retaliation may include dismissal, demotion, suspension, loss of opportunity, intimidation, or any other adverse treatment. Any act of retaliation will result in disciplinary action up to and including termination or contract suspension.

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## Confidentiality

All reports and investigations are handled discreetly. Information will only be shared with those who have a legitimate need to know in order to investigate the concern, implement corrective action, or meet legal obligations.

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## Investigative Process

All reports are promptly reviewed by a designated representative. If a full investigation is warranted, it may include:

- Interviews with the complainant (if known) and relevant parties
- Review of documentation or evidence
- Consultation with legal or external investigators

Findings and corrective actions will be documented, and the complainant will be informed of the outcome where possible.

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## Oversight and Roles

<b>Role</b>	<b>Responsibility</b>
Designated Recipient (DR)	Receives and assesses internal and anonymous reports, initiating appropriate response pathways.
Ethics & Integrity Officer (E&I)	Leads investigations and documents findings. May be an external legal counsel if no internal compliance officer is appointed.
Executive Leadership	Ensures protection from retaliation and oversees remedial action.
Audit Committee (Board of Directors)	Provides governance oversight.

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## Bad Faith or Malicious Reporting

WCMRC encourages good-faith reporting. However, knowingly false, malicious, or reckless allegations may result in disciplinary or contractual consequences. This policy is intended to protect individuals who report genuine concerns, not to advance personal grievances or vexatious complaints.

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## Policy Review

This policy is reviewed every two years or as required by law or operational needs. Administrative changes may be approved by the Director of Human Resources; substantive revisions require Board approval.

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## Questions or Assistance

If you have questions about this policy or are unsure how to report a concern, please contact HR at [HumanResources@wcmrc.com](mailto:HumanResources@wcmrc.com).