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# Whistleblower Administration

## Purpose

The Whistleblower Policy, this Whistleblower Administration section, and other related resources are designed to provide a mechanism for employees and others to bring to the attention of senior management (or the appropriate body) situations of known or suspected Wrongdoing on the part of NAV CANADA:

- Officers, directors, or employees
  - Contractors, agents, or vendors,
- so that NAV CANADA can address and correct inappropriate conduct.

## Reporting Procedure

NAV CANADA has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their immediate supervisor.

If employees are not comfortable speaking with their supervisor, or are not satisfied with the supervisor's response, they are encouraged to submit a report through the NAV CANADA Confidential system "Sentinel", which is managed by a third party and provides for anonymity if the employee requires it.

Reports can be submitted in English or French by way of the following channels:

- Online at [www.integritycounts.ca/org/navcanada](http://www.integritycounts.ca/org/navcanada);
- By phone at 1-866-921-6714
- By mail at PO Box 91880, West Vancouver, BC V7V 4S4
- By email at [navcanada@integritycounts.ca](mailto:navcanada@integritycounts.ca)
- By fax at 1-604-926-5668

## Confidentiality

Reports are submitted on a confidential basis by the reporter, and are kept confidential to the extent possible, consistent with the need to conduct an adequate follow-up or investigation.

## Vendors

NAV CANADA vendors are able to file reports through the Sentinel system and are provided with the NAV CANADA Business Code of Conduct which sets out the channels through which a report can be filed.

## No Retaliation

It is contrary to the values of NAV CANADA for anyone to retaliate against any person who in good faith submits a report alleging a Wrongdoing. Reports of retaliation against whistleblowers will be investigated by NAV CANADA and may be addressed with disciplinary measures up to and including termination of employment for cause.

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## Investigation Procedure

The Chief Legal Officer of NAV CANADA is responsible for ensuring that all reports of known or suspected Wrongdoing are reviewed, investigated and resolved. NAV CANADA's Chief Legal Officer notifies the person who submitted a report and acknowledges receipt of the report, through the third party functionality, maintaining confidentiality and anonymity as required by the reporter.

All reports are promptly followed up on and where appropriate, investigated and appropriate corrective action will be taken if warranted by the investigation.

The Chief Legal Officer will engage other senior executives, any employee or third party as required depending on the nature of the investigation and to the extent that such an executive, employee or third party is not implicated in the report. The Chief Legal Officer will liaise with the Director of Internal Audit to keep him/her advised of the ongoing investigations.

Any investigative activity required in relation to reports received will be conducted without regard to the position/title, length of service, or relationship to NAV CANADA of the individual(s) subject to the report.

## Referral to Fraud Committee

In instances where the report specifically relates to a suspected fraud as defined in the NAV CANADA Fraud Policy, the matter will be referred to the Fraud Committee. The investigation will continue under the direction of the Chief Legal Officer and the Fraud Committee will be updated on the progress and findings of the investigation as appropriate.

## Annual Awareness Campaign

On a yearly basis, an employee awareness campaign of the policy, including the Sentinel functionality, will be run across the enterprise, at the direction of the Chief Legal Officer.

## Board Reporting

At quarterly meetings, the Chief Legal Officer will provide a standing report to the Audit and Finance Committee of the Board on the number and nature of reports received, particulars of any concerns or complaints received regarding corporate accounting practices, internal controls or the audit function. Matters falling within the mandates of other Board Committees will be referred to those committees on a quarterly basis.

The Chief Legal Officer may, in his/her discretion and in collaboration with the Director, Internal Audit, choose to bring a matter to the immediate attention of a Chair of a Board Committee, including but not limited to the Audit and Finance Committee so that input can be obtained as to the nature of the investigation to be conducted.

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