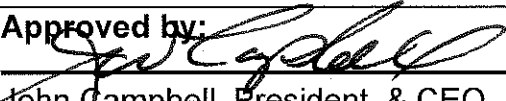


WATERFRONToronto

HR Guideline: Disclosure of Wrong-Doing	Guideline #: 20
Effective Date: October 27, 2009	Approved by:  John Campbell, President & CEO

General Information

Waterfront Toronto (WT) conducts its business operations with honesty, integrity, open communication and in a manner which preserves public confidence, trust and accountability.

This process has been established to ensure that there is a forum for WT employees, stakeholders and/or the public to voice concerns related to:

- questionable financial, accounting and/or auditing matters;
- unethical business conduct including breaches of Codes of Conduct and Conflict of Interest;
- violations of federal or provincial laws;
- danger to health, safety or well-being of WT employees and/or the general public; and
- damage to property.

This guideline should be read in conjunction with the existing Codes of Conduct.

This guideline sets out the approach to be used:

1. In the treatment of verbal or written reports received by the Corporation regarding concerns of misconduct as defined above, whether submitted by directors, officers or employees of the Corporation or by stakeholders and/or the public.
2. To provide guidance to employees and the means to make reports in a confidential and anonymous manner.
3. To make clear the Corporation's intention to discipline, up to and including termination of employment, any person determined to have engaged in retaliatory behaviour.

No employee who in good faith makes a report under this guideline shall suffer harassment, retaliation or adverse employment consequences. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Likewise, employees are obligated to act in good faith when reporting a concern or issue. Allegations that are not made in good faith or that are made with malicious intent may be viewed as a serious disciplinary offence.

Matters related to workplace discrimination and/or harassment will be dealt with through the Discrimination/Harassment-Free Workplace Human Resources Guideline #19.

An employee can approach Human Resources at any time for guidance and assistance.

Application

This guideline is applicable to all employees of WT. It can also be utilized by stakeholders and/or a member of the public to make a report of alleged misconduct.

Procedure

1. If an employee, stakeholder and/or member of the public wishes to make a **report of misconduct as defined in this guideline**, he/she will submit a written report outlining his/her concern, confidentially, to the Chief Executive Officer (CEO) of WT. If the individual wishes to remain anonymous, the written report should clearly indicate this request for anonymity.

The written report should be submitted in a sealed envelope and labelled as follows:

"To be opened by the Chief Executive Officer of Waterfront Toronto"

and delivered by post to: 20 Bay Street, Suite 1310, Toronto, ON M5J 2N8

2. The **CEO** will promptly **investigate** the concern(s) and take appropriate corrective actions including communicating back to the individual. All reports will be treated as confidential by WT to the fullest extent possible given that a full and fair investigation may be required. The CEO will inform the individual how the concern(s) was/were dealt with. For example:

- not accepted (e.g. outside the parameters of this guideline, more properly a human rights issue, etc.);
- accepted but not investigated (e.g. insufficient information, etc.); or
- investigation concluded.

3. Where the concern should more properly be addressed by the **Chair** of WT Board of Directors, the individual should **send the confidential report in a sealed envelope** with the following label:

"To be opened by the Chair, Waterfront Toronto Board of Directors"

and delivered by post to : 20 Bay Street, Suite 1310, Toronto, ON M5J 2N8

4. The **Chair** will promptly **investigate** the concern(s) and take appropriate corrective actions including communicating back to the individual. All reports will be treated as confidential by WT to the fullest extent possible given that a full and fair investigation may be required. The Chair will inform the individual how the concern(s) was/were dealt with. For example:

- not accepted (e.g. outside the parameters of this guideline, more properly a human rights issue, etc.);
- accepted but not investigated (e.g. insufficient information, etc.); or
- investigation concluded.

Records Retention:

Records pertaining to a report are the property of the Corporation and shall be retained confidentially and where applicable, in such a manner to protect the anonymity of the individual filing the report.

