

WATER POLO CANADA

WHISTLEBLOWER POLICY

General

Water Polo Canada (“**WPC**”) requires employees, members, officers and directors of WPC to observe high standards of personal and business ethics in the conduct of their activities, duties and responsibilities involving WPC. In addition, WPC strives to maintain financial records and prepare financial statements and reports which comply with all applicable accounting principles and laws. As members, employees and representatives of WPC, we must demonstrate honesty and integrity in fulfilling our responsibilities and conducting our behaviour. We must comply with all applicable laws and regulations at all times. Any activity that is unlawful, unethical, harassing and/or discriminatory is prohibited.

Purpose

The goal of this Whistleblower Policy (the “**Policy**”) is to discourage illegal, unethical, harassing and/or discriminatory activity and business conduct (“**questionable behaviour**”) that damages WPC’s reputation, business interests and its relationship with members and stakeholders and the community at large. This Policy provides an avenue for members, employees, officers and directors to raise concerns regarding questionable behaviour, and it provides reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

Reporting Responsibility

It is the responsibility of all employees, members, officers and directors of WPC to report any violations or suspected violations of any WPC Policy or code of conduct, any questionable behaviour and any concerns regarding accounting, financial statement disclosure, internal accounting, disclosure controls or auditing matters (a “**Complaint**”) in accordance with this Policy.

Executives, officers and directors of WPC are required to report all Complaints to WPC’s Compliance Officer, who has the specific and exclusive responsibility to investigate all Complaints. A sample Complaint Form is attached hereto as Exhibit A, which is recommended for use by the person receiving the Complaint.

No Retaliation

No employee, member, officer or director of WPC who in good faith makes a Complaint shall suffer harassment, retaliation or adverse consequences to employment, membership or otherwise. An employee, officer or director that retaliates against someone who has made a Complaint in good faith is subject to discipline up to and including termination of membership, employment or other relationship with WPC, and he/she may be faced with other disciplinary actions pursuant to the terms of WPC’s policies.

Reporting Violations

This Policy is intended to encourage and enable employees, members, officers and directors to raise serious concerns within WPC, rather than seeking resolution outside WPC. WPC has an open door policy, and it encourages its members, employees, officers and/or directors to speak with someone in WPC's management whom they are comfortable approaching and who can address their questions, concerns, suggestions and complaints properly.

Compliance Officer

WPC's Compliance Officer is responsible for investigating all reported Complaints. The Compliance Officer is the Executive Director of WPC and may be contacted by telephone at <*> or by email at <*>. If you are not comfortable speaking with the Compliance Officer or, if the Compliance Officer is unavailable and the matter is urgent, you may contact <*>, <Title> at <*> or by email at <*>.

Acting in Good Faith

Anyone filing a Complaint must be acting in good faith and have reasonable grounds for reporting the questionable behaviour. Any allegations found to be unsubstantiated and which prove to have been made maliciously or with the knowledge that they were false will be viewed as a serious disciplinary offence.

This Policy encourages employees, members, directors and officers to identify themselves when making any allegations, since the appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Reported violations or suspected violations expressed anonymously will be investigated, but consideration will be given to the following factors: fairness to any individual named in the Complaint, the seriousness of the issue raised, the credibility of the information or allegations in the Complaint and the prospects of an effective investigation and discovery of evidence.

Confidentiality

WPC will treat all Complaints as confidential and privileged to the fullest extent as reasonably possible and as permitted by law. WPC will exercise particular care to keep confidential the identity of any person making a Complaint under this procedure until a formal investigation is launched. Thereafter, the identity of the person making the Complaint may be kept confidential, if requested, unless such confidentiality is incompatible with a fair investigation, unless there is an overriding reason for identifying or otherwise disclosing the identity of the person or unless such disclosure is required by law. In this instance, the person making the Complaint will be so informed in advance of him or her being identified with the Complaint. Where disciplinary proceedings are invoked against any individual following a Complaint, WPC will typically require the name of the person making the Complaint to be disclosed to the person subject to such proceedings.

Though WPC encourages individuals to put their name to any Complaint they make, anonymous Complaints will also be accepted. In responding to an anonymous Complaint, WPC will pay due regard to fairness towards any individual named in the Complaint, the seriousness of the issue raised, the credibility of the information or allegations in the Complaint and the prospects of an effective investigation and discovery of evidence.

Investigations will be conducted, taking into account the nature and complexity of the Complaint and the issues raised therein.

Handling of Complaints

As soon as reasonably practicable, the Compliance Officer will notify the sender and acknowledge receipt of a Complaint, provided that it has not been filed anonymously. All reports will be promptly investigated, and the appropriate corrective action, as warranted by the investigation, will be taken.

Effective Date

This Policy is in effect as of June 12, 2012.

WPC reserves the right to modify or amend this Policy at any time as it may deem necessary.

**EXHIBIT A
COMPLAINT FORM**

Date: _____ Complainant: _____
Tel: _____ E-mail: _____
Position/Relationship with WPC: _____

Type of Violation: Conduct Violation Legal Accounting/Auditing Retaliation

Date Reporting Person became aware of potential violation: _____

Violation is: Ongoing Completed Unclear whether ongoing or completed

Department suspected of violation: _____

Individual(s) suspected of violation: _____

Describe all of the relevant facts of the violation:

How did Reporting Person become aware of the violation:

Steps taken by Reporting Person prior to contact:

Who, if anyone, may be harmed or affected by the violation?

If violation is legal, estimate amount of loss to WPC as a result of violation:

Actual: _____ Potential: _____

If the violation relates to accounting/auditing matter, estimate the amount of the misreporting and indicate the affected category (or categories) of misreporting:

Amount _____

Category: Assets Liabilities Expenses
 Revenues Valuation Equity

Provide any suggestions for remedying the violation:

Do you wish to be contacted by the investigation officers regarding the status of the investigation?

Yes No