

**INSTITUT NATIONAL DE LA RECHERCHE SCIENTIFIQUE (INRS)  
DISCLOSURE OF WRONGDOING DIRECTIVE**

ADOPTION		
AUTHORITY	DATE	RESOLUTION
Board of Directors	February 22, 2011	371A-2011-3108

AMENDMENT(S)			
AUTHORITY	DATE	RESOLUTION	COMMENTS
Board of Directors	June 14, 2012	385A-2012-3282	Standardization with INRS Normative Documents and the INRS Internal Management Regulation ( <i>Règlement de régie interne de l'INRS, Regulation 1</i> ) *
Office of Secretary General	December 14, 2014		Minors amendments

<b>REVISION</b>	As required or, at a minimum, every three years
<b>PERSON IN CHARGE</b>	Secretary General
<b>CODE</b>	D-02-2012.2

\* Coming into force determined by the Board as of September 1, 2012.

The French version alone of this Normative Document has been officially adopted by INRS's authorities. In case of differences, the French version prevails.



## PREAMBLE

Pursuant to the *Code of Ethics of the INRS University Community* (the “Code of Ethics”) and the *INRS Directors’ Code of Ethics and Good Practices* (the “Directors’ Code”), the members of the University Community are to disclose any Wrongdoing of which they are aware.

An internal mechanism for Disclosures is set forth in the Code of Ethics and in the Directors’ Code. INRS acknowledges, however, that in certain circumstances, access to an external anonymous mechanism may facilitate Disclosures.

By implementing such a mechanism, INRS endeavours to promote and facilitate Disclosures of Wrongdoing as well as to protect members of the University Community who make a Disclosure of Wrongdoing against possible reprisals.

## 1. PURPOSE

The purpose of the *INRS Disclosure of Wrongdoing Directive* (the “Directive”) is to put an external anonymous Disclosure of Wrongdoing mechanism in place at INRS that ensures the diligent and confidential processing of information received and the protection of its users against any form of reprisal. This mechanism, called the Ethical Line, is accessible through a secured telephone line and Internet site reserved exclusively for INRS Disclosures of Wrongdoing.

## 2. DEFINITIONS

For the purposes of the Directive, the defined expressions shall have the meanings assigned to them below.

**“Disclosure”**: The act by which one or more members of the University Community raise concerns or worries about a Wrongdoing of which they are aware.

**“Ethical Line”**: External anonymous Disclosure of Wrongdoing put in place by the Directive comprising a secured telephone line and Internet site reserved exclusively for INRS Disclosures of Wrongdoing.

**“Executive”**: An employee occupying a managerial function in an advisory capacity, or a Director or an Officer

**“Normative Document”**: An INRS regulation, code, policy, directive, procedure or any other document that sets forth rules to follow or ways of conducting affairs, and like documents issued by granting agencies and which apply to INRS.

**“Officer”<sup>1</sup>**: The Director General, Scientific Director, Administration and Finance Director, and Secretary General.

**“Professor”**: A regular, fellow, substitute, adjunct, guest, honorary or emeritus professor.

**“Research Centre”**: The *Centre Eau Terre Environnement*, *Centre Énergie Matériaux Télécommunications*, *Centre INRS-Institut Armand-Frappier* and *Centre Urbanisation Culture Société*.

**“Staff”**: Anyone hired as an INRS employee.

**“University Community”**: The INRS Executives, Professors, Staff, students and trainees, including postdoctoral fellows.

**“Wrongdoing”**: Any behaviour prohibited by law, a regulation, the Code of Ethics or any other Normative Document, such as:

- falsification of accounting records;
- theft and fraud;
- intentional concealment or misstatement of material information or facts;
- use of funds for purposes other than those originally intended;
- misappropriation of funds;
- bribe-taking;
- unlawful or unauthorized use of INRS property;
- Conflict of Interest or collusion concerning calls for tenders;
- payment authorization for goods or services that have not been supplied to INRS;
- substitution of goods by others of lesser quality;
- breaking the law, breaching regulations or other Normative Documents;
- failing to take into account the state of the art on a given subject;
- unauthorized disclosure of confidential information;
- unauthorized use of confidential information;
- abuse of authority.

### 3. SCOPE

The Directive applies to all members of the University Community.

It applies to any Wrongdoing covered by the Code of Ethics or by the Directors’ Code, other than those the processing of which is specifically covered by another Normative Document.

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<sup>1</sup> In accordance with decision 400A-2013-3418 adopted by the Board on December 12, 2013, within the framework of external relations, the officers titles are respectively replaced by those commonly used in the university environment, that is to say :

- Rector replaces Director General;
- Vice Rector of research and academic affairs replaces Scientific Director;
- Vice Rector of administration and finances replaces Administration and Finance Director; and
- Vice Rector of governance and human resources and secretary general replaces Secretary General.

#### 4. ENFORCEMENT

The Secretariat General of INRS is responsible for enforcing the Directive.

#### 5. PRINCIPLES

The Directive is based on the following principles:

- all Disclosures are treated in a confidential, objective and impartial manner;
- information gathered from any Disclosure is treated diligently;
- users of the Ethical Line are entitled to anonymity and appropriate action is taken to respect that right;
- appropriate steps are taken to protect users of the Ethical Line, and any other persons who may collaborate, against possible reprisals.

#### 6. PROCEDURE

6.1 The Ethical Line, reserved exclusively for INRS Disclosures of Wrongdoing, is available in the form of a toll-free telephone line (1-877-733-0417) and an Internet site ([www.clearviewconnects.ca](http://www.clearviewconnects.ca)). Both are secured and accessible 24 hours a day, 365 days a year.

6.2 An external firm offers specialized services, comprising:

- the supply of a secured telephone line and Internet site as specified in article 6.1;
- the receipt of information by telephone and through the Internet site;
- ensuring the anonymity of Ethical Line users and privacy of information received;
- the provision of a reference number to users allowing them to communicate again with the Ethical Line for general information on the progress of their Disclosures and, depending on the situation, providing additional information;
- management of a system for compiling information received;
- the provision of a comprehensive report on each Disclosure to the Secretariat General. If a Disclosure involves an Executive or a member of the Secretariat General Staff, the report is transmitted to the Chair of the Governance and Ethics Committee. If a Disclosure entails, in the external firm's judgment, an immediate threat to the physical safety of one or more persons, the report will also be transmitted to the appropriate police service.

6.3 Disclosures are then processed by INRS according to a procedure similar to those set out in article 7.3 of the Code of Ethics or article 13.3 of the Directors' Code, as the case may be.

#### 7. REVISION

The Directive is updated when required or, at a minimum, every three years.

**8. FINAL PROVISIONS**

The Directive comes into force at the same time as the Code of Ethics or on the date determined by the Board.