

# Whistleblower Protection Policy

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Effective Date: 9/25/2013; Revised Date: 3/26/2014

## POLICY

St. Anne's commits to high standards of ethical, moral and legal business conduct and, as such, protects any Employee who raises concerns regarding agency conduct from retaliation and victimization.

## PURPOSE

The purpose of this policy is to establish avenues for any Employee, representative of the agency, officers, Members of the Board of Directors, Members of the Board of Trustees, interns or volunteers to raise concerns regarding fraudulent or dishonest conduct, use or misuse of St. Anne's resources or property, questionable accounting or auditing matters by employees, officers or any other interested party, or other breach of St. Anne's business conduct standards, while providing for protection against retaliatory actions.

## PROCEDURE

### Raising a Concern

A concern may include, but is not limited to, one of the following:

- Suspected incident(s) of theft, fraud or dishonest conduct;
- Financial reporting that is intentionally misleading or so carelessly reported as to breach St. Anne's business conduct standards;
- Improper or undocumented financial transactions;
- Improper destruction of records;
- Improper use of assets;
- Violation of St. Anne's Conflict of Interest Policy or any other standards related to business conduct; or
- Any other improper occurrences.

### Who May Report a Concern

A concern may be reported by any Employee, representative of the agency, Officers, Members of the Board of Directors, Members of the Board of Trustees, interns or volunteers (hereinafter together and individually referred to as "complainant").

### Designated Recipients of a Report of Concern

A complainant may choose to report a concern to a supervisor, Program Director or Department Head, Human Resources Department, the President and Chief Executive Officer (CEO), or a Member of the Board of Directors, as appropriate. While St. Anne's prefers that any report of a concern identify the complainant, an anonymously-submitted report will also be accepted and handled under this policy.

## **Handling of the Reported Concern**

After a report of a concern is made, the following steps will be taken:

1. The concern will be promptly conveyed to the Chief Human Resources Officer (CHRO), the President and CEO and the Chair of the Board of Directors.
2. The Chair of the Board will promptly notify the Board of Directors of any such report; however, it is not required to notify a specific Board Member or the President and CEO if the concern(s) directly involve(s) any of these individuals.
3. The CHRO will notify the complainant if self-identified and acknowledge receipt of the concern.
4. All reports will be promptly investigated by the Executive Committee.
5. Appropriate corrective action will be taken, if warranted by the investigation. In addition, St. Anne's will follow-up with the complainant (unless anonymous) for resolution of the concern. The investigation, corrective action, and conclusion will be documented in a written summary and will be preserved indefinitely or as otherwise required by law.

The Board of Directors has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

## **Confidentiality**

Reports of concerns and investigations will be kept confidential to the extent possible. However, the complainant's identity may have to be disclosed to conduct a thorough investigation, to comply with the law or as needed to assure accused individuals of their legal rights to defend.

## **No Retaliation**

This Whistleblower Protection Policy is intended to encourage and enable any Employee, representative of the agency, officers, Members of the Board of Directors, Members of the Board of Trustees, interns or volunteers to raise concerns within the agency for investigation and appropriate action. With this goal in mind, no complainant who, in good faith, reports a concern will be subject to retaliation or adverse employment action for making such report. Any person who so retaliates will be subject to corrective action, up to and including, termination. However, a complainant who is not acting in good faith, does not have reasonable grounds for believing the information disclosed indicates an improper business practice, or who makes unsubstantiated allegations that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, may be subject to corrective action, up to and including, termination.