



Section 8: Corporate Compliance

Policy Number: 8.11

Board Approved: 10/23/2006

Revised Date: 2/25/15

Warren, Washington & Albany Counties Chapter, NYSARC, Inc.
Whistleblower Policy; Reporting Compliance Concerns / Anti – Retaliation

WWAARC requires directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the WWAARC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that WWAARC can address and correct inappropriate conduct and actions. *It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of WWAARC's code of ethics or suspected violations of law or regulations that govern WWAARC's operations.*

No Retaliation

No director, officer, employee or volunteer of WWAARC who in good faith reports any action or suspended action taken by or within the WWAARC that is illegal, fraudulent, or in violation of any adopted policy of the corporation shall suffer intimidation, harassment, discrimination or other retaliation, or in the case of employees, adverse employment consequence.

Reporting Procedure

WWAARC has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor and/or the Corporate Compliance Officer. WWAARC encourages staff to relay any and all concerns to management with the spirit of a cooperative collaboration for resolution to the concern. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Associate Executive Director of your department and/or the Corporate Compliance Officer. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the WWAARC's Corporate Compliance Officer who has the responsibility to investigate all reported complaints. If the complaint involves the Compliance Officer or the Compliance unit, reports should be made to their supervisor, AED and the Executive Director. The Executive Director will inform the Board President and a determination made for investigation and follow up. Employees, directors, officers, and volunteers with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director or the organization's Compliance Officer.

Confidentiality

Any employee, director, officer or volunteer may make reports pursuant to this policy confidentially or anonymously. The WWAARC has established a confidential email address Stephen.Ramos@caparcny.org and telephone number the hotline, 1-866-219-1122 to receive

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reports of complaints. The identity of the reporter will be kept confidential and only disclosed with the consent of the reporter or when extraordinary circumstances exist. In the latter case, the decision to disclose the identity of reporters rests with the WWAARC's Corporate Compliance Officer.

All investigations of reported matters will be conducted in a confidential manner, so that information will be disclosed only as needed to facilitate review of the investigation or otherwise as required by law.

Compliance Officer

The WWAARC's Corporate Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least quarterly to the Corporate Compliance Committee (made up of independent directors) on compliance activity relating to such reports.

Accounting and Auditing Matters

The WWAARC's Corporate Compliance Officer shall immediately notify the Audit Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Handling of Reported Violations

The WWAARC's Corporate Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Tracking of Investigations / Complaints

A complaint form will be completed by the Compliance Officer or designee for all reports of a suspected violation. Upon receipt of a complaint/violation the Compliance Officer shall commence an investigation in to the matter in accordance with agency policy.

The Compliance Officer shall report to the Corporate Compliance Committee of the Board a summary and disposition of all incidents/violations reported or identified along with any corrective and preventative actions taken.