



Policy Name:	Whistleblower Protection and Reporting				
Policy Division:	Human Resources	Section Title:	General Rules		
Approval Authority:	Board of Directors	Adopted:	2008	Reviewed:	10/15/2018
Responsible Party:	Human Resources Director	Revised:	03/2018		
Responsible Office:	Human Resources	Contact:	Human Resources Director		

Policy Statement

The SHARE Foundation is committed to an internal culture that promotes prevention, detection, and resolution of instances of conduct that do not conform to applicable laws, rules, and regulations and to SHARE's policy on Business Ethics and Conduct. To support this commitment, SHARE encourages its employees to report known or suspected compliance violations and has adopted a strict policy to prevent retaliation, retribution, and harassment against anyone who reports, in good faith, known or suspected violations.

Who Should Read this Policy

All SHARE Foundation employees

Resources

None

Definitions

Retaliation:

Any adverse action taken by an employer against an employee for filing a complaint or supporting another employee's complaint

Related Policies

Compliance

Problem Solving

Business Ethics and Conduct

The Policy

Employees of SHARE are encouraged and expected to promptly report, through the appropriate channels, knowledge of suspected, actual, or potential violations of law, regulations, policy, and procedure violations of SHARE's Business Ethics and Conduct policy. Reports should be made to a supervisor, manager, or other management staff within the employee's chain of command. If employees are uncomfortable about raising concerns directly to a supervisor or if a concern has been raised and not addressed, employees should report their concern through one of the following methods:

1. A phone call or written statement to the Compliance Coordinator (SHARE President/CEO)
2. By utilizing the anonymous Whistleblower reporting box on the SHARE employee website.

The submissions made via the Whistleblower reporting box are sent directly to both the Compliance Coordinator and the VP of Finance. The employee may indicate his/her name and contact information in the text box or may choose not to do so. No attempt will be made to trace the source of the complainant and the employee's confidentiality is maintained.

SHARE will not retaliate against an employee who in, good faith reports, protests or makes a complaint against some practice of SHARE or another individual or entity with whom SHARE does business on the basis of a known or suspected violation of law, SHARE policy, or a clear mandate of public policy.

This policy does not preclude an employee from filing charges, communicating with or participating in an investigation or proceeding conducted by an appropriate governmental agency on matters within its responsibility.

Reporting an action or concern under this policy does not allow an employee to avoid the consequences of his/her own wrongdoing.

The Whistleblower Protection and Reporting policy is not designed for general employee complaints. Only matters involving noncompliance with law or policy will be reviewed and, if appropriate, investigated.

Examples of noncompliance include but are not limited to:

- Conflicts of interest or other unethical practices
- Financial reporting or accounting irregularities
- Fraud, theft, or embezzlement
- Safety or environmental problems
- Sexual harassment, sexual violence, or stalking
- Threats to information security or data privacy
- Violation of anti-discrimination or equal opportunity laws
- Violation of tax laws or IRS regulations
- Non-compliance with Medicare or Medicaid Conditions of Participation
- Waste, abuse, or misuse of resources