



WHISTLEBLOWER POLICY

PURPOSE

The purpose of this policy is to support the organization's goal of legal compliance in all areas of business operations and service delivery. The support of all employees is necessary to achieving compliance with applicable laws and regulations.

SCOPE

This policy applies to all employees of LADD.

POLICY

It is the policy of LADD to adhere to all laws, regulations and contract standards regarding organizational behavior and to encourage any employee who reasonably believes that a policy, practice, or activity LADD engages in is a violation of the law, unethical or inappropriate to report that behavior without fear of retribution.

STANDARDS AND DEFINITIONS:

Whistleblower - A whistleblower is an employee who reports an activity that is illegal, unethical or inappropriate. Examples of such behavior;

- Billing for services not performed or paying for goods not delivered.
- A criminal offence, for example fraud.
- Someone's health and safety are in danger.
- Risk or actual damage to the environment.
- A miscarriage of justice.
- The company is breaking the law
- You believe someone is covering up wrongdoing

Retaliation - Occurs when an employer takes an **adverse action** against a **covered individual** because he or she engaged in a **protected activity**.

- All employees are protected from retaliation. It is the employee's responsibility to bring alleged unlawful activity of LADD to the CCO and provide LADD with a reasonable opportunity to investigate and correct the alleged unlawful activity. Protection is available to employees that comply with this requirement. Any actions or intentions to 'cover up' or failure to report information related to the issue will be appropriately disciplined.
- LADD will not retaliate against an employee for disclosing information that an employee or applicant reasonably believes provides evidence of a violation of any law, rule, regulation, gross mismanagement, gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety. One of LADD's core values includes positive open communication at all levels.
- Whistleblowers are protected from retaliation for disclosing information that an employee or applicant reasonably believes provides evidence of a violation of any law, rule, regulation, gross mismanagement, gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety. Any employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including separation of employment.
- Directors, officers, employees, and volunteers should share their questions, concerns, suggestions or complaints with someone who can address them properly. The CCO is available at any time.
- **Any employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including separation from employment.**

In order for a person to put forward a claim as a Whistleblower, it must be determined they reported information that led to an act of retaliation by looking at the following:

- A protected activity occurred such as a report to a supervisor was made indicating an illegal, unethical or inappropriate activity occurred.
- An adverse employment action was taken, such as firing or laying off, demoting, denying overtime or promotion, or reducing pay or hours.

A causal connection between the protected activity and adverse action can be made.

Complaint Reporting - It is the responsibility of all employees to immediately report to the CCO, any suspicion of fraud, waste, or abuse in connection with the business of LADD and may do so without fear of retaliation.

Confidentiality – Reports may be submitted on a confidential basis by the employee and will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Follow up questions and investigation may not be possible or may be hindered unless the source of the information has been identified.

PROCEDURE

1. The employee should promptly report suspected or actual events to the CCO using published methods such as calling the Compliance Hotline or sending the CCO an email. Refer to the Complaint Reporting Policy for additional information regarding reporting requirements and methods.
2. If the employee is uncomfortable or otherwise reluctant to report to the CCO then the employee can report the event to the Board of Directors or Executive Director.
3. The employee can report the event with his/her identity or anonymously.
4. The employee shall receive no retaliation or retribution for a report. If the employee is found to have been involved in some way with the issue being reported the fact that they reported does not remove them from potential disciplinary action if they are found to be an active participant in the reported issue.
5. The employee will provide details necessary to complete a thorough investigation by the CCO per the Investigation Policy. Investigations must be completed in a timely manner.
6. If the event reported includes a crime against a person or property, such as assault, rape, burglary, etc., it should immediately be reported to local law enforcement personnel.
7. When possible, the employee who reported shall receive a Notice of Findings within five business days of the initial report of the event regarding the investigation, disposition or resolution of the issue.

WE MAKE THE DIFFERENCE