

STANDARD OPERATING PROCEDURE

WHISTLEBLOWER POLICY BOARD OF DIRECTORS

I. Purpose

- A. The North Central Texas Trauma Regional Advisory Council's (NCTTRAC's) Code of Ethics (Code) requires Officers, Directors, Committee/Subcommittee Chairs Elect, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.
- B. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

II. Reporting Responsibility

It is the responsibility of all Officers, Directors, Committee/Subcommittee Chairs Elect, and employees to comply with the Code of Ethics and to report violations or suspected violations in accordance with this Whistleblower Policy.

III. No Retaliation

- A. No Officer, Director, Committee/Subcommittee Chair Elect, or employee who in good faith reports a violation of the Code of Ethics shall suffer harassment, retaliation, or adverse employment consequence.
- B. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.
- C. This Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

IV. Reporting Violations

- A. The Code addresses NCTTRAC's open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly.
- B. In most cases, an employee's supervisor is in the best position to address an area of concern.
- C. Employees who are not comfortable speaking with their supervisor or are not satisfied with their supervisor's response are encouraged to speak with any Director with whom they are comfortable approaching.
- D. Supervisors and managers are required to report suspected violations of the Code to the NCTTRAC Communications & Information Manager, who has specific and exclusive responsibility to investigate all reported violations.
- E. For suspected fraud, or when an employee is not satisfied or uncomfortable with following NCTTRAC's open door policy, individuals should contact the Communications & Information Manager directly.

V. Compliance Officer

- A. NCTTRAC's Communications & Information Manager will serve as the Compliance Officer and is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his/her discretion, shall advise the Executive Director and/or the Executive Committee of the Board of Directors (Executive Committee).

- B. The Communications & Information Manager has direct access to the Executive Committee and is required to report to the Finance Committee at least annually on compliance activity.

VI. Accounting and Auditing Matters

- A. The Finance Committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing.
- B. The Communications & Information Manager shall immediately notify the Finance Committee of any such complaint and work with the Committee until the matter is resolved.

VII. Acting in Good Faith

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

VIII. Confidentiality

- A. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously.
- B. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

IX. Handling of Reported Violations

- A. The Communications & Information Manager will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days.
- B. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.