

1. Purpose

- 1.1 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.
- 1.2 Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

2. Reporting Responsibility

- 2.2 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.

3. No Retaliation

- 3.1 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.
- 3.2 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.
- 3.3 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.

4. Reporting Violations

- 4.1 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.
- 4.2 In most cases, an employee's supervisor is in the best position to address an area of concern.
- 4.3 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.
- 4.4 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.
- 4.5 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.

5. Compliance Officer

- 5.1 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).

- 5.2 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.

6. Accounting and Auditing Matters

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

7. Acting in Good Faith

- 7.1 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.
- 7.2 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.

8. Confidentiality

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

9. Handling of Reported Violations

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