

**CRIME VICTIM SERVICES
PERSONNEL POLICY MANUAL**

WHISTLEBLOWER POLICY

**SECTION 6.13
PAGE 1 OF 3**

- A. General: Crime Victim Services requires all employees, board members, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of CVS, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.
- B. Reporting Responsibility: It is the responsibility of all employees to comply with the ethics and policies contained in the policy manual and to report violations or suspected violations in accordance with the Whistleblower Policy, Ohio Revised Code 4113.52, and the provisions of the Sarbanes-Oxley Act of 2002.
- C. No Retaliation: No employee, who in good faith reports a violation of the Employer's policies or ethical standards, shall suffer harassment, retaliation, or adverse employment consequence. 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. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within CVS prior to seeking resolution outside the agency.
- D. Reporting Violations: Crime Victim Services has an open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if the employee is not comfortable speaking with their immediate supervisor or is not satisfied with the supervisor's response, the employee is encouraged to speak with the Executive Director or anyone in management whom the employee is comfortable in approaching. Supervisors are required to report suspected violations of the Employer's policies to the Executive Director, who has specific and exclusive

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**SECTION 6.13
PAGE 2 OF 3**

responsibility to investigate all reported violations. For suspected fraud, or when the employee is not satisfied or uncomfortable with following the CVS' open door policy, individuals should contact the Executive Director directly.

- E. Executive Director: The Executive Director is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Employer's policies and ethical standards and, at his discretion, shall advise the audit Board of Directors. The Executive Director has direct access to the Board of Directors and is required to report to the Board of Directors at least annually on compliance activity.

- F. Accounting and Auditing Matters: The Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Executive Director shall immediately notify the Board of Directors of any such complaint and work with the Executive Director until the matter is resolved.

- G. Acting in Good Faith: Anyone filing a complaint concerning a violation or suspected violation of the Employer's policies or ethical standards must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the policies or ethical standards. 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.

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

**CRIME VICTIM SERVICES
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WHISTLEBLOWER POLICY

**SECTION 6.13
PAGE 3 OF 3**

- J. Handling of Reported Violations: The Executive Director will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Original Adoption Date: 01/22/10 Revision Date: _____