

PHIPPS HOUSES - PHIPPS NEIGHBORHOODS WHISTLEBLOWER POLICY

In order to provide a safe and comfortable working environment for employees and volunteers, and to protect Phipps' reputation, Phipps provides certain protections for the employee or volunteer who, in good faith, reports misconduct. However, there are certain obligations on the part of the employee or volunteer seeking to obtain those protections.

An employee or volunteer may not be subject to "Retaliatory Action" (discharge, suspension, demotion or other adverse employment action) for any of the following actions by the employee or volunteer:

- Disclosure, or threat of disclosure, to a supervisor or to a public body (including legislative, judicial supervisory and administrative bodies of federal, state county or local governments) of any activity, policy or practice of Phipps that the employee or volunteer, in good faith, reasonably believes is in violation of a law, rule or regulation; or
- Providing information to or testifying before a public body conducting an investigation, hearing or inquiry into any violation of law, rule or regulation by the Phipps; or
- Objecting to, or refusing to participate in any activity, policy or practice which the employee or volunteer, in good faith, reasonably believes is in violation of an applicable law, rule or regulation, or is fraudulent, criminal, constitutes harassment of any employee or volunteer, or is incompatible with a clear mandate of public policy concerning the public health, safety or welfare.

Phipps expects, and, we believe, fairness would require, that before making disclosure to a public body, the employee or volunteer first bring the activity, policy or practice he or she wishes to disclose to Phipps' attention and afford Phipps a reasonable opportunity to correct the problem. However, the employee or volunteer is always at complete liberty to contact any governmental agency he or she thinks appropriate, and Phipps will never interfere with that right.

RESPONSIBILITIES OF THE CONSCIENTIOUS EMPLOYEE OR VOLUNTEER

Phipps expects each employee or volunteer to share in the responsibility for ensuring that Phipps complies with all applicable laws and regulations. Therefore, it is the responsibility of every employee or volunteer to report to his or her supervisor any unlawful or improper conduct by any Phipps employee or volunteer relating in any way to Phipps. Where the conduct in question involves the employee's or volunteer's supervisor or some other complaint regarding how you have been treated by some staff member, the employee or volunteer should report the conduct to Phipps' Vice President for Human Resources.

All other complaints, including any concerns about improper conduct by a staff member that does not affect you personally, should be reported to Phipps' General Counsel, who is the organization's designated Whistleblower Policy Compliance Officer. If, and only if, under the circumstances, the employee or volunteer concludes that it would not be appropriate to report the conduct to any member of Phipps' management, the employee or volunteer may report the conduct to the Chairperson of the Phipps Houses Board of Trustees.

An employee or volunteer who violates this policy by failing to report unlawful or improper conduct may himself or herself be subject to disciplinary action, up to and including termination of employment or volunteer opportunity. While Phipps expects employees and volunteers to comply with this policy, it will never interfere with their right to report any matter to a governmental authority.