Whistleblower Policy

Purpose

Phelps County Dream Center requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Phelps County Dream Center, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Phelps County Dream Center can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of Phelps County Dream Center code of ethics or suspected violations of law or regulations that govern Phelps County Dream Center operations.

No Retaliation

It is contrary to the values of Phelps County Dream Center for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation or a suspected violation of law such as a complaint of discrimination, suspected fraud, or suspected violation of any regulation governing the operations of Phelps County Dream Center. 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.

Reporting Procedure

Phelps County Dream Center has an open-door policy and suggests that directors and staff share their questions, concerns, suggestions, or complaints. The first course of action should be to directly address the issue with the relevant party, if possible. If not possible or the resolution is not satisfactory, the complainant should report complaints or concerns about suspected ethical and legal

violations in writing to the Chairman of the Board. The Chairperson has the responsibility to investigate all reported complaints. If the Chairperson is unable to resolve the issue satisfactorily, or approaching the Chairperson does not seem appropriate, then the report should be escalated to the Compliance Officer.

Compliance Officer

Phelps County Dream Center's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director and/or Board of Directors of all complaints and their resolution. The Compliance Officer may be a board member, the Executive Director, or a third party designated by the Phelps County Dream Center to receive, investigate, and respond to complaints. If no Compliance Officer is designated, then the Vice Chairman of the board assumes the role by default.

Acting in Good Faith

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

Confidentiality

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

Handling of Reported Violations

Phelps County Dream Center Compliance Officer/Vice Chairman of the board will notify the person who submitted a complaint and acknowledge receipt of the reported violation. All reports will be promptly investigated and appropriate corrective action will be taken as warranted by the investigation.

Policy approved by the Board of Directors on: