

Lifesavers Healing Together, Inc.

Whistleblower Policy

Section One – Purpose and Definitions

A. Purpose and Scope of Authority. The purpose of the whistleblower policy is to protect directors, officers, employees, and contractors of Lifesavers Healing Together, Inc.'s (“LIFESAVERS”) when any of the aforementioned individuals reports a violation of federal, state, or local law or regulations, or LIFESAVERS’ own Bylaws, policies, etc. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

B. Statement of Intention. It is the intent of LIFESAVERS to adhere to all laws and regulations that apply to the organization, and the underlying purpose of this Policy is to support the organization's goal of legal compliance. The support of all individuals and entities associated with LIFESAVERS is necessary to achieving compliance with various laws and regulations.

C. Definitions.

C (i). For the purposes of this Policy, the term “rule” shall mean federal, state, or local law or regulations, or LIFESAVERS’ own Bylaws, policies, etc.

C (ii). For the purposes of this Policy, the term “individual” shall mean directors, officers, employees, and contractors, irrespective of whether the contractor may be a natural person or entity.

C (ii). For the purposes of this Policy, the term “complainant” shall mean any individual who witnesses, suspects, or has reason to believe a violation of a rule has occurred, and desires to report said violation.

Section Two – Specific Provisions

A. No Retaliation. No complainant who in good faith reports a violation of any rule shall suffer harassment, retaliation or adverse employment consequence. An individual who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or contract. This Whistleblower Policy is intended to encourage and enable individuals and others to raise serious concerns within the LIFESAVERS prior to seeking resolution outside the LIFESAVERS.

B. Reporting Violations. In most cases, a complainant’s supervisor is in the best position to address an area of concern with respect to compliance with any rule.

However, if an complainant is not comfortable speaking with a supervisor or is not satisfied with the supervisor's response, he or she is encouraged to address his concern directly with the Chairman or the Board of Directors as a whole.

C. Responsibility of Management. Supervisors and managers are required to report suspected violations of any rule to the Board of Directors, who has specific and exclusive responsibility to investigate all reported violations.

D. Protection from Retaliation. A complainant is protected from retaliation only if the complainant brings the alleged unlawful activity, policy, or practice to the attention of the Chairman or the Board of Directors and provides a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described herein is only available to complainants who comply with this requirement.

E. Specific Violation; Business or Relationship. No individual shall retaliate against any complainant who, in good faith, has made a protest or raised a complaint against some business or family relationship of the individual, on the basis of a reasonable belief that the relationship is in violation a rule or a clear mandate of public policy.

F. Specific Violation; Public Policy. No individual shall retaliate against complainant who discloses or threatens to disclose to a supervisor or a public body any activity, policy, or practice that the individual reasonably believes is in violation of a rule mandated pursuant to law or is in violation of a clear mandate or public policy concerning health, safety, welfare, or protection of the environment.

G. Acting in Good Faith. Anyone filing a complaint concerning a violation or suspected violation of any rule must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of a rule. 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.

I. Acknowledgement. The Board of Directors may proscribe that all individuals having any kind of arrangement with LIFESAVERS sign a document indicating their understanding and agreement to comply with this Policy.

Adopted by the Board of Directors of Lifesavers Healing Together, Inc. on this ___ day of April, 2015.