

**HARPENDING HOUSING, INC.
CLINTON CREST MANOR**

**WHISTLEBLOWER
POLICY & PROCEDURE**

DEFINITION:

A whistleblower is an informant who exposes wrongdoing within an organization in the hope of stopping it; a person who exposes any kind of information or activity that is deemed illegal, unethical, or not correct within an organization.

POLICY:

The Clinton Crest Manor Code of Conduct (hereinafter referred to as the Code) requires directors, volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Each director, volunteer and employee of Clinton Crest Manor has an obligation to report any actual or perceived improper activities. It is the duty of each director, volunteer and employee to report a suspected violation of any policy and procedure to the administrator or the president of the board of directors.

Clinton Crest Manor will not allow or undertake any retaliatory action against anyone who in good faith has reported an actual or suspected violation, including dismissal or termination.

Any threatened or actual retaliation is a serious violation of Clinton Crest Manor's Code of Conduct and will subject the violator to appropriate disciplinary action.

PROCEDURES:

1. All reported concerns will be promptly forwarded to the executive committee. The executive committee shall be responsible for investigating, and making appropriate recommendations to the board of directors with respect to all reported concerns.

2. Reporting Concerns

Employees

Employees should first discuss their concern with the administrator. If, after speaking with the administrator, the individual continues to have reasonable grounds to believe the concern is valid, the individual should report the concern to the president of the board of directors.

If the individual is uncomfortable speaking with the administrator, or the administrator is a subject of the concern, the individual should report his or her concern directly to the president of the board of directors.

The president of the board of directors is required to promptly report the concern to the executive committee, who has specific and exclusive responsibility to investigate all concerns. If the president of the board of directors for any reason does not promptly forward the concern to the executive committee, the reporting individual should report the concern to the executive committee. Contact information can be found below.

If the concern is reported verbally to the president of the board of directors, he or she will assist the reporting individual in putting the concern in writing.

Concerns may also be submitted anonymously. Such anonymous concerns should be in writing and sent directly to the executive committee.

3. Directors and Volunteers

Directors and volunteers should submit concerns in writing directly to the executive committee. Contact information for the executive committee may be obtained through the administration office.

4. Handling of Reported Violations

All reports involving the administrator or the administrator's direct reports or board president will be promptly investigated by the executive committee.

All reports involving other individuals will be promptly investigated by the administrator, in consultation with the executive committee.

The executive committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

The executive committee will notify the sender and acknowledge receipt of the concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted concerns.

Appropriate corrective action will be recommended to the board of directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the concern.

Directors who are employees may not participate in any board or committee deliberations or voting relating to administration of this whistleblower policy.

The person who is subject of a whistleblower complaint may not be present at or participate in board or committee deliberations or vote on the matter relating to such complaint, provided that nothing in this subparagraph shall prohibit the board or committee from requesting that the person who is the subject of the complaint to present information as background or answer questions at a committee or board meeting prior to the commencement of deliberations and voting related thereto.

5. Acting in Good Faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates improper activities. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

6. Confidentiality

Reports of concerns and investigations shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

The identity of someone reporting a suspected concern will remain confidential unless the complaint requires a civil or criminal investigation or in other compelling circumstances where safety is at risk.

7. Publication

This policy should be posted on the Corporation website and on-site in a conspicuous location accessible to employees and volunteers.

8. Retaliation Prohibited

No director, officer, employee or volunteer of the Corporation who in good faith reports any action or suspected action taken by or within the Corporation that is illegal, fraudulent, or in violation of any adopted policy of the Corporation shall suffer intimidation, harassment, discrimination or other retaliation or in the case of employees, adverse employment consequence.

9. Contact Information

Clinton Crest Manor
411 Clinton Street
Penn Yan, New York 14527
(315) 536-8800

Administrator
Deena Conley
cell (315) 270-2563

President, Board of Directors
John Cooley, M.D.
cell (607) 592-0073

Vice President, Board of Directors
Mary Little
(607) 243-5181