



Whistleblower and Non-Retaliation

Policy:

CHOICE requires senior management, supervisors, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of **CHOICE**, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. A whistleblower, as defined by this policy, is a member of senior management, supervisor, employee, or volunteer to member of **CHOICE** who reports an activity that he or she considers to be illegal or dishonest.

Procedure:

1. Reporting Responsibility
 - a. It is the responsibility of all senior management, supervisors, employees, and volunteers to comply with and to report violations or suspected violations of the Code of Conduct, **CHOICE** policies, or laws in accordance with this policy.
2. Non-Retaliation
 - a. No member of senior management, supervisor, employee, or volunteer, who in good faith reports a violation of ethical standards, **CHOICE** policies, or law, 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 **CHOICE** prior to seeking resolution outside.
3. Reporting Violations
 - a. Senior management, supervisors, employees, and volunteers should share their questions, concerns, suggestions or complaints with the Compliance Department. If one wishes to report anonymously, they may use the Compliance Hotline to do so.
4. Acting in Good Faith
 - a. Any good faith report, concern or complaint is fully protected by this policy, even if the report, question or concern is, after investigation, not substantiated. Anyone filing a 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 of ethical standards, **CHOICE's** policies, or law. Any allegations that prove not to be substantiated and have been made maliciously or with knowledge that they were false will be treated as a serious disciplinary offense.
5. Confidentiality
 - a. 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.

6. Handling of Reported Violations

- a. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. The complainant will be informed that follow-up has or is occurring within two weeks after the Compliance Department has received the complaint or report.