

## Policy & Procedure

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Policy Title: Whistleblower Protections

Policy Number: 703

### Policy:

Arc Human Services (the organization) is committed to maintaining the highest standards of integrity, accountability, and ethical behavior. This policy provides a framework for reporting concerns regarding misconduct, unethical behavior, or legal violations while ensuring protection from retaliation for those who make good-faith disclosures.

### Reporting Misconduct:

The organization has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or dissatisfied with your supervisor's response, you are encouraged to speak with the organization's Compliance Officer. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the organization's Compliance Officer, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the CEO or the organization's Compliance Officer. Employees and stakeholders are encouraged to report any suspected violations, including but not limited to:

- Fraud, theft, or financial misconduct
- Violation of laws, regulations, or company policies
- Discrimination, harassment, or workplace violence
- Health and safety violations
- Misuse of organizational resources
- Any unethical or illegal behavior

### Response Procedure:

The Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the CEO and/or the Board of Directors of all complaints and their resolution and will report on compliance activity relating to alleged and substantiated improprieties.

### Good Faith Disclosures:

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 knowingly to be false will be viewed as a serious disciplinary offense.

### Confidentiality and Anonymity:

Reports may be made anonymously, but providing contact information can aid in thorough investigations. The organization will treat all reports confidentially to the fullest extent possible. Disclosures will only be shared on a need-to-know basis for investigation purposes.

### Protection Against Retaliation:

Any form of retaliation against whistleblowers is strictly prohibited. Retaliatory actions such as termination, demotion, harassment, or discrimination will be subject to disciplinary measures, up to and including termination. Employees who believe they have experienced retaliation should report it immediately using the reporting channels outlined in this policy.

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### Training and Awareness:

Employees will receive training on this policy as part of onboarding and through periodic compliance updates. Awareness campaigns will be conducted to encourage ethical reporting.

Updated March 1, 2025