




Policy and Procedures

DEPARTMENT NAME Administration/Human Resources		
SUBJECT Whistle Blowers Policy		POLICY NUMBER: AD-007
APPROVAL: 	Effective Date: 9-23-2020	REPLACES: AD-007 dated August 20, 2013

- I. **PURPOSE:** Children’s Network of Southwest Florida (CNSWFL) has established a procedure by which employees can report to the CNSWFL allegations of known or suspected alleged Improper Activities (as hereinafter defined). All employees of the Company are encouraged to report either orally or in writing to their immediate supervisor, or alternate line of authority as described below, all evidence of activity that may constitute Improper Activities.

- II. **REVIEW HISTORY:** New policy approved 4/14/13 and updated 5/3/13 and 8/20/13.

- III. **CONTACT:** Administrative Assistant to the CEO

- IV. **PERSONS AFFECTED:** This policy applies to all employees of the Children’s Network of Southwest Florida and its contracted providers.

- V. **POLICY:** Any CNSWFL employee who in good faith reports incidents of improper activity will be protected from threats of retaliation, discharge, or other type of retaliation, including compensation or terms and conditions of employment that are directly related to the disclosure of the report. In addition, no employee may be adversely affected because the employee refused to carry out a directive which, in fact, constitutes corporate fraud or is a violation of state or federal law.

- VI. **RATIONALE:** The purpose of this policy is to protect employees who report improper activity and encourage employees to make these reports. To comply with applicable federal and state laws prohibiting retaliation, and to promote the fair treatment of employees who make good faith reports of potential improper activity.

- VII. **CROSS REFERENCES:** Florida Statute 112.3187(2): Most current Employee Handbook

VIII. **PROCEDURES:**

- A. Improper Activities include, but are not limited to,
1. Questionable accounting, internal accounting controls or auditing matters;
 2. Violations of the Company's Code of Ethics for Senior Financial Officers or other Code of Conduct, if any;
 3. Violations of federal or state securities laws or other laws applicable to the CNSWFL;
 4. Wire fraud, mail fraud, bank fraud, or any fraud against the Company's stockholders or under statute;
 5. Forgery or alteration of documents;
 6. Misappropriation or misuse of CNSWFL resources, such as funds or other assets;
 7. Authorizing or receiving compensation for goods not received or services not performed;
 8. Violations of the Equal Employment Opportunity, harassment, workplace violence or safety of employees and client's rights and policies
 9. Any other activity by an employee that is undertaken in the performance of the employee's official duties, whether or not that action is within the scope of his or her employment, and that is in violation of any state or federal law or regulation, or constitutes malfeasance, bribery, fraud, misuse of CNSWFL property, or willful omission to perform his or her duties, or involves gross misconduct. This also includes professional standards, kickbacks, confidentiality, conflicts of interests.

IX. **PROCEDURES:**

- A. Reporting requirement
1. All officers, directors and employees are required to report information concerning Improper Activities. Such reports may be submitted in a confidential and anonymous manner. Such reports are encouraged to be made in writing so as to assure a clear understanding of the issues, but may be oral. Such reports should be factual rather than speculative or conclusory, and should contain specific information to allow for proper assessment of the nature, extent and urgency of the issues raised in the report.
 2. Reporting employees should refrain from (i) obtaining evidence for which they do not have a right of access and (ii) conducting their own investigative activities.
 3. Employees who file reports of Improper Activities or provide evidence which they know to be false or without a reasonable belief in the truth and

accuracy of such information will not be protected and may be subject to disciplinary action and legal claims.

4. Reporting employees who report Improper Activities on an anonymous basis must provide sufficient corroborating evidence to justify the commencement of an investigation. Unspecified wrongdoing or broad allegations without verifiable evidentiary support may not lead to an investigation. Because of the inability of investigators to interview anonymous reporting employees, it may be more difficult to evaluate the credibility of an Improper Activity and therefore, it is less likely that an investigation will be initiated.
5. Confidentiality shall be maintained for employees who disclose Improper Activities and all possible efforts to conduct an investigation in a manner that does not disclose the identity of the employee shall be utilized.

B. Line of authority for reporting improper activities:

1. To submit a report involving any known or suspected Improper Activity, an employee may call the Corporate Ethics Hotline at 1-800-229-0691, option 8, the Office of Chief Inspector General, the Agency Inspector General, the Florida Commission on Human relations, the Whistle Blowers Hotline number at 800-543-5353, or write to the Human Resources Director at c/o Camelot Community Care, 4910-D Creekside Drive, Clearwater, FL 33760.
2. If the employee submitting the complaint is uncomfortable for any reason addressing such concerns to the Human Resources Department of Camelot Community Care, they can submit the concerns to the Children's Network of Southwest Florida, Chief Executive Officer.

C. Children's Network of Southwest Florida will comply with applicable federal and state laws prohibiting retaliation, and promote the fair treatment of employees who make good faith reports of improper activity.

1. Complaints and actions taken to resolve complaints will be handled confidentially, to the extent confidentiality is consistent with applicable law, safety, with the need to conduct a fair and sufficient investigation,, and with implementation of appropriate remedial measures.
2. Reporting improper activity is a legally protected act. Retaliation against an employee is prohibited, and violators may be subject to disciplinary action.