

CAPSEA, Inc.

Whistle Blower Policy

Confidential Reporting of Financial Impropriety or Misuse of CAPSEA, Inc. Resources

The following policy can be followed if a member of the CAPSEA, Inc. board, staff or volunteer component is uncomfortable reporting information internally.

Any member of the board, staff or volunteers affiliated with CAPSEA, Inc. with information about known or suspected financial improprieties or misuse of CAPSEA, Inc. resources or other ethical problems is encouraged to report their concerns in writing to the executive director. The executive director is required to promptly report the concern to the Board President and follow procedures under section **XI. Disciplinary Action** in the Personnel Policies and Procedures manual to investigate or arrange for an external investigation.

In the event that the allegations involve the Board President and/or the executive director, the Vice President of the Board, along with the Executive Committee and/or the full board of directors will investigate or arrange for an external investigation. The identity of the person making reports about financial improprieties and misuse of CAPSEA, Inc. resources will be held in confidence, except among those conducting the investigation and counsel, unless: 1) the individual who reports the situation agrees to reveal her/his identity, or 2) the report or action resulting from the report leads to some type of legal action (investigation, administrative action, or lawsuit).

The person reporting may choose to do so anonymously in written format via mail or other type of communication. Such persons are urged to include sufficient information in the report so that CAPSEA, Inc. may adequately investigate the allegations.

There will be no retaliation against any individual reporting a concern if the report is made in good faith.

When the identity of the person reporting the concern is known, CAPSEA, Inc. will result on the corrective action taken, if any, at the conclusion of the investigation.

Members of the board, staff and volunteers of CAPSEA, Inc. will review this policy annually.

This policy will be attached/added to the Personnel Policies and Procedures Manual.

Board Approved 8-18-09