



Whistleblower Protection Policy

In keeping with the policy of maintaining the highest standards of conduct and ethics, the *CCMSH* will investigate any suspected fraudulent or dishonest use or misuse of *CCMSH*'s resources or property by board members or staff. All board members and staff shall act with honesty, integrity and openness in all their dealings as representatives for the organization. Failure to follow these standards will result in disciplinary action including dismissal from one's duties and possible civil or criminal prosecution if warranted.

Board members and staff are encouraged to report suspected fraudulent or dishonest conduct (i.e. to act as "whistleblower"), to the *CCMSH* President or the Chair of the *CCMSH* Board of Directors. Alternatively, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to one of the individuals listed above.

Reasonable care should be taken in dealing with suspected misconduct to avoid:

- Baseless allegations;
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation; and
- Violations of a person's rights under law.

Due to the important yet sensitive nature of the suspected violations, effective professional follow-up is critical. All relevant matters will be reviewed and analyzed with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken, if necessary, and the findings will be communicated to the parties involved. Investigations may warrant investigation by an independent person such as auditors and/or attorneys.

The *CCMSH* will protect whistleblowers as defined below:

CCMSH will use its best efforts to protect whistleblowers against retaliation. Whistle blowing complaints will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that whistle-blower complaints will only be shared with those who have a need to know so that *CCMSH* can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. Any complaint or retaliation will be promptly investigated, and appropriate corrective measures taken if allegations of retaliation are substantiated.