

“WHISTLEBLOWER” PROTECTION POLICY

As set forth throughout this Handbook, HACM strives to maintain the highest standards of integrity. Consistent with this commitment, HACM encourages its employees to report conduct, activities and/or practices that the employee reasonably believes are illegal, dishonest, fraudulent, unethical or otherwise improper. Examples of such conduct include, but are not limited to violations of federal, state, or local laws and/or regulations.

If an employee has knowledge of or a concern of conduct, activities and/or practices that are illegal, dishonest, fraudulent, unethical or otherwise improper, the employee is encouraged to report the knowledge or concern to his/her immediate supervisor, the Human Resources Director or the Secretary/Executive Director. For purposes of this policy, a “whistleblower” is defined as an employee who reports, in good faith, conduct, activities and/or practices known or believed to be illegal, dishonest, fraudulent, unethical or otherwise improper to one of the parties identified within this policy.

HACM will promptly investigate all such reports of conduct, activities and/or practices that are illegal, dishonest, fraudulent, unethical or otherwise improper. HACM will maintain confidentiality to the extent that it can. However, the identity of the whistleblower may need to be disclosed to comply with applicable law, to conduct a proper thorough investigation or for other valid reasons.

HACM prohibits retaliation against a whistleblower as defined by this policy and against any employee who provides information or otherwise participates in an investigation pursuant to this policy. This includes, but is not limited to, protection from adverse employment action such as termination and/or discipline. However, employees must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to disciplinary action, up to and including termination. Likewise, the right of a whistleblower for protection against retaliation does not include “immunity” for any personal wrongdoing or misconduct.

Any employee who believes that he/she is being retaliated against in violation of this policy must contact his/her immediate supervisor, the Director of Human Resources or the Secretary/Executive Director.

Nothing in this policy is intended to create a legally binding contract or to change the at-will nature of employment with HACM. Employment with HACM is voluntarily entered into and employees are free to resign at any time with or without cause. Similarly, HACM may terminate the employment relationship at will at any time with or without cause. HACM may also modify this Grievance Procedure at any time, with or without notice.