

# **Southwest Harbor – Tremont Nursing Service, Inc.**

## **Whistleblower Policy**

### **Article I - General**

The Southwest Harbor – Tremont Nursing Service, Inc. (SWHTNS) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the SWHTNS, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Article II – Reporting Responsibility**

It is the responsibility of all directors, officers and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

### **Article III – No Retaliation**

No director, officer or employee who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or affiliation. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the SWHTNS prior to seeking resolution outside SWHTNS.

### **Article IV – Reporting Violations**

The SWHTNS has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with any Board member or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected ethics violations to the SWHTNS Board, or to the Officer, who's job description includes the responsibility to investigate all reported violations.

### **Article V - Board and Officer duties**

The SWHTNS Board or any officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her/their discretion, shall advise the President and / or Board.

## **Article VI - Accounting and Auditing Matters**

The Board of directors and / or Officers shall address all reported concerns or complaints regarding accounting practices, internal controls or auditing and immediately notify the full Board of any such complaint and work with the Board until the matter is resolved.

## **Article VII - Acting in Good Faith**

Anyone filing a 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.

## **Article VIII - Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **Article IX - Handling of Reported Violations**

The Board and / or Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

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