|  |  |  |
| --- | --- | --- |
| Whistleblower  | **Last Revision:** | June 2019 |
| **Last Reviewed:** | June 2020 |
| **Applies to the following THA Group of Companies:**  | * Island Health Care
* Island Hospice
* Independent Life at Home
* THA Services
* RightHealth®
* PalliationChoices
 |
| **Included in the following THA Manuals:** | Administrative Policies & ProceduresLeadership |

**PURPOSE**

THA Group’s Value and Ethics Compliance Policy requires leaders, officers and employees to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of THA Group, the practice of honesty and integrity guides all members of the organization in fulfilling responsibilities and complying with all applicable laws and regulations.

#### POLICY

**Reporting** **Responsibility**

It is the responsibility of all leaders, officers and employees to comply with the Value and Ethics Compliance Policy and to report violations or suspected violations in accordance with the Whistleblower Policy.

**No** **Retaliation**

No leader, officer or employee who reports a violation of the Value and Ethics Policy shall suffer harassment, retaliation or adverse employment consequences. An employee who retaliates against someone who has reported a violation is subject to corrective action up to and including separation of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within THA Group prior to seeking resolution outside THA Group.

**Reporting** **Violations**

The Value and Ethics Policy addresses THA Group’s open culture and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them appropriately. In most cases, an employee's leader is in the best position to address an area of concern. However, if the employee is not comfortable speaking with their leader or are not satisfied with the leader’s response, they are encouraged to speak with someone in Talent Management or anyone in leadership. Leaders are required to report suspected violations of the Value and Ethics Policy to THA Group’s Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or dissatisfaction with following THA Group’s open culture, individuals should contact THA Group’s Compliance Officer directly.

**Compliance** **Officer**

THA Group’s designated Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Value and Ethics Policy and, at their discretion, shall advise the Coordinating Council/Hospice Advisory Board. The Compliance Officer has direct access to the Coordinating Council/Hospice Advisory Board and is required to report to the Coordinating Council/Hospice Advisory Board at least annually on compliance activity.

**Accounting** **and** **Auditing** **Matters**

The Coordinating Council/Hospice Advisory Board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Coordinating Council/Hospice Advisory Board of any such complaint and work with the Coordinating Council/Hospice Advisory Board until the matter is resolved.

**Acting** **in** **Good** **Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Value and Ethics Policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the policy. 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 offense.

**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.

**Handling** **of** **Reported** **Violations**

The Compliance 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 as appropriate by the investigation.