



Employee Manual Section II: Employee Relations

Subject: Corporate Non-Compliance and Whistleblower Complaints

Adopted: 9/23/11

Revised: 3-14-12

Any employee aware of any acts of fraud, waste, abuse, or corporate non-compliance is obligated to report the activity. It is the policy of the Area Agency on Aging 1-B that no employee who makes a report of alleged wrongdoing in good faith will be subjected to reprisal, retaliation, harassment, retribution, discipline or discrimination by the AAA 1-B or any of its employees or agents based on having made the report. Any employee or agent who engages in any such reprisal, retaliation, harassment, retribution, discipline or discrimination against a good faith reporter may be subject to disciplinary action as deemed appropriate by the AAA 1-B and in accordance with the Whistleblowers Act.

All complaints of corporate non-compliance and whistleblower complaints must be reported to the Corporate Compliance Officer (CCO). An electronic mailbox has been established for the anonymous reporting of these complaints. A form for reporting such complaints is also available at S:\Forms\HR\Non-Compliance or Whistleblower Complaint. This form may be completed and submitted anonymously to the CCO's mailbox. The CCO will report all suspected compliance violations to the Executive Committee of the Board of Directors, and all complaints will be thoroughly investigated. The CCO will take steps to safeguard the confidentiality of all reports and investigations. Reports and investigation results will be reported, with recommendations for appropriate disciplinary action, to the CEO, Board of Directors and Compliance and Risk Management Committee.