

# HEALTHCARE INDUSTRY RESILIENCE COLLABORATIVE, ASSOCIATION (HIRC) WHISTLEBLOWER POLICY

## PURPOSE

### **Section 1: Ethical Obligations (the “Ethical Code”)**

The Healthcare Industry Resilience Collaborative, Association (“HIRC”) requires all directors, officers, advisory council members, employees, contractors, and grantees (all referred to herein as “stakeholders”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of HIRC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

## POLICY

### **Section 2: Reporting Responsibility**

It is the responsibility of all stakeholders to comply with this Ethical Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

### **Section 3: No Retaliation**

No stakeholder who in good faith reports a violation of this Ethical Code shall suffer harassment, retaliation, or adverse employment, reputational, or financial consequence. An employee or contractor who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or contract relationship. This Whistleblower Policy is intended to encourage and enable stakeholders and others to raise serious concerns within HIRC prior to seeking resolution outside HIRC.

### **Section 4: Reporting Violations**

HIRC operates with an open door policy and suggests that stakeholders share their questions, concerns, suggestions or complaints about this Ethical Code with someone who can address them properly. The earlier a concern is expressed, the easier it is to take action. For employees, their supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with his or her supervisor or is not satisfied with the supervisor’s response, the employee is encouraged to speak with the Board Chair or Chair Elect or anyone else in management. Supervisors and managers are required to report suspected violations of this Ethical Code to the Board Chair or Chair Elect, who have specific and exclusive responsibility to investigate all reported violations. For contractors and grantees, concerns about violations of this policy should be directed to the Board Chair or Chair Elect. For directors and advisory council members, concerns regarding employee, contractor, grantee, or other directors’ or advisory council members’ actions or activities should be communicated to the Board Chair, the Board Chair Elect, or to a member of the Executive Committee in a timely manner. Individuals who are not satisfied or comfortable following HIRC’s open door policy should contact a member of the Executive Committee directly.

### **Section 5: Board Chair and Chair Elect**

The Board Chair and Chair Elect, for purposes of this policy, are responsible, respectively, for investigating and resolving all reported complaints and allegations concerning violations of this Whistleblower Policy. The Board Chair and Chair Elect have direct access to the Executive Committee and are required to report to the Executive Committee at least annually on compliance activity.

**Section 6: Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of this Ethical Code, must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of this Ethical Code. 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 and may be grounds for termination.

**Section 7: Confidentiality**

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

**Section 8: Handling of Reported Violations**

The Board Chair or Chair Elect will acknowledge receipt of the complaint within three (3) business days. All complaints will be promptly investigated and appropriate corrective action will be taken by the Board of Directors if warranted by the investigation.

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This Whistleblower Policy has been approved and adopted by the Board of Directors of HIRC on May 18, 2022.