Whistleblower Policy

of

Franciscan Charities, Inc.

1. Purpose. Franciscan Charities, Inc. (“Franciscan Charities” or the “Organization”) is committed to high business and ethical standards. In line with this commitment, the Board of Directors of the Organization (the “Board”) has established the following policies and procedures for the Organization.
2. Application. This policy applies to all of the Organization’s employees, volunteers, contractors, officers, and Board members.
3. Reporting Responsibility. Franciscan Charities has an Open Door policy and encourages employees to share their concerns, complaints or information relating to illegal practices of the Organization with their supervisor. Employees who are not comfortable speaking with their supervisor or are not satisfied with their supervisor’s response are encouraged to speak to other management level personnel or to the Designated Officer... Anyone else should report information relating to any illegal practices or violations of Organization policy to the Vice President of the Organization (the “Designated Officer”), unless the report relates to the Designated Officer himself or herself, in which case the report shall be made directly to President of the Board of Directors. Anyone providing such a report must be acting in good faith and have reasonable cause to believe the information being reported is credible. The report shall include sufficient detail to permit a proper assessment and, if possible, should include any corroborating evidence.
4. Investigation Procedures. The Designated Officer (or a member of the Board, in the case of a report about the Designated Officer) shall first make a determination as to whether, in the Designated Officer’s reasonable judgement, a reasonable basis exists for commencing an investigation. If the Designated Officer believes that an investigation should be made, the Designated Officer shall notify the Executive Committee Board. The Executive Committee will then determine, in its reasonable judgement, whether an investigation should be commenced. If the Executive Committee of the Board determines that an investigation should occur, then the Designated Officer or his or her designee shall proceed with the investigation. Outside legal, accounting, or other expertise may be retained as necessary to assist in conducting the investigation. The Organization shall maintain a written record of all complaints, investigations, and resolutions thereof, and shall make a report to the Board at least annually to report on compliance activity. All personnel must cooperate in an investigation when called upon to do so.
5. Corrective Action. The Organization , with input from the Designated Officer and any appropriate members of Organization management, shall determine the validity of any complaints and any corrective actions to be taken. Anyone found to have knowingly materially violated any laws, regulations, or Organization policies will be subject to disciplinary action, up to and including termination.
6. Confidentiality. The Organization shall endeavor to protect the confidentiality of all persons bringing credible information under this policy. Reports of concerns and investigations pertaining thereto shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
7. Protection from Retaliation. The Organization prohibits taking any negative action for reporting information in accordance with this policy. Anyone who retaliates against another person who has either reported a violation in good faith or who, in good faith, cooperated with an investigation under this policy will be subject to discipline, up to and including termination. Anyone who is retaliated against in any form should immediately report the retaliation as a violation of this policy.