



## **Protected Disclosure Policy**

### **1. Whistleblower Protection Policy**

NBLASC requires board members, management and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives and employees of the NBLASC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **2. Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that NBLASC can address and correct inappropriate conduct and actions. It is the responsibility of all board members, management, and employees to report concerns about violations of NBLASC's code of ethics or suspected violations of law or regulations that govern NBLASC's operations.

### **3. No Retaliation**

It is contrary to the values of NBLASC for anyone to retaliate against any board member, manager, or employee who in good faith reports an ethics violation, or a suspected violation of law, a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of NBLASC. 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.

### **4. Reporting Procedure**

NBLASC encourages and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. 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 Human Resources or the next level of management. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations to the Executive Director, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor, the Executive Director or Human Resources.

### **5. Executive Director**

The Executive Director is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Executive Director will advise the Board of Directors of any substantiated findings and their resolution and will report at least annually to the Chair of the Finance Committee on compliance activity relating to accounting or alleged financial improprieties.



## 6. Accounting and Auditing Matters

The Executive Director shall immediately notify the Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing, and work with the committee until the matter is resolved.

## 7. Acting in Good Faith

Anyone filing a written 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.

## 8. Confidentiality

Violations or suspected violations may 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.

## 9. Handling of Reported Violations

The Executive Director will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

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