



the “Step 2” written response. Human Resources will then do an investigation of all issues concerned by conducting interviews as appropriate and utilizing tools to access facts. Human Resources will work in conjunction with the Chief Programs Officer to determine the final outcome. Should they not agree on the final outcome, they will take the matter to the CEO, who will make the final determination.

### **Whistleblower Policy**

CHILDREN’S BUREAU requires all employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Agency, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

A whistleblower as defined by this policy is an employee of CHILDREN’S BUREAU who reports an activity that he/she has reasonable cause to believe violates a federal or state statute, rule, or regulation or violates the Agency’s responsibility to employees or clientele. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures.

If an employee has knowledge of or a concern about such activity, the employee is to contact the Chief Human Resources Officer. In addition, such reports can be made using the Ethics Point Hotline (an independent third party reporting service available 24 hours a day, 7 days a week), accessible by telephone at (844) 437-8456, or via the web/internet at [www.all4kids.ethicspoint.com](http://www.all4kids.ethicspoint.com). For suspected fraud, or when the employee is not satisfied with the aforementioned procedure, individuals can contact the President/Chief Executive Officer.

Employees must exercise sound judgment to avoid baseless allegations. An employee who knowingly files a false report of wrongdoing will be subject to discipline up to and including termination.

Insofar as possible, the confidentiality of the whistleblower will be maintained. However, that person’s identity might have to be disclosed to conduct a thorough investigation, to comply with the law, and/or to provide accused individuals their legal rights of defense. CHILDREN’S BUREAU will not tolerate retaliation against any employee who makes a good faith report under this policy. Any whistleblower who believes he/she is being retaliated against must contact the Chief Human Resources Officer immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing.

All reports of illegal or dishonest activities will be promptly investigated by the Human Resources Department and appropriate corrective action will be taken.

Nothing in this Employee Handbook prohibits an employee from reporting concerns to, filing a charge or complaint with, making lawful disclosures to, providing documents or other information to or participating in an investigation or hearing conducted by the Equal



Employment Opportunity Commission (“EEOC”), National Labor Relations Board (“NLRB”), Securities and Exchange Commission (“SEC”) or any other federal, state or local agency charged with the enforcement of any laws.

Employees with any questions regarding this policy should contact the Human Resources Department.