

Policy on Suspected Misconduct, Dishonesty, Fraud, and Whistle-blower Protection

T & E Care is committed to the highest possible standards of ethical, moral, and legal conduct. Consistent with this commitment, this policy aims to provide avenues for board members, volunteers and other individuals to raise concerns about suspected misconduct, dishonesty, and fraud and to provide reassurance that they will be protected from reprisals or victimization for whistle-blowing in good faith.

PROCEDURE

Reporting

T & E Care Board Members and Volunteers and any other person who has a concern relating to suspected misconduct, dishonesty or fraud may make a report. T & E Care wants to hear of possible problems in these areas.

Concerns or suspected misconduct, dishonesty or fraud may be reported by telephone, email or regular mail, at the individual's or reporter's preference:

A board member, volunteer or concerned individual may submit a report to either:

T&E Care Board Chair, confidential
T&E Care
PO Box 2111
Southeastern, PA 19399

or

Seth Landau
924 Castlehill Lane
Devon, PA 19333
(Seth is a former T&E Care Board member)

Reports received will be forwarded to the T & E Care Board, as appropriate.

Timing

The earlier a concern is expressed, the easier it is to take action.

Investigating the Concern

Following the receipt of any complaints submitted, the Board Members will investigate each matter so reported and take corrective and disciplinary actions where appropriate.

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The Board members may enlist committee members, outside legal, accounting or other advisors, as appropriate, to conduct any investigation of complaints regarding financial reporting, accounting, internal accounting controls, auditing matters, or any other form of misconduct, dishonesty, or fraud. In conducting any investigation, the Board Members shall use reasonable efforts to protect the confidentiality and anonymity of the complainant.

Further Information

The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant.

Report to Complainant

The complainant will be given the opportunity to receive follow-up on their concern within two weeks:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling them whether initial inquiries have been made; and
- Telling them whether further investigations will follow, and if not, why.

Information

Subject to legal constraints the complainant will receive information about the outcome of any investigations.

Document Retention

The Board Members shall retain as a part of the records of the Committee any such complaints or concerns for a period of at least seven years.

SAFEGUARDS

No Retaliation

No board member, volunteer or other person who in good faith reports a violation shall suffer harassment, retaliation or adverse consequence. This policy is intended to

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encourage and enable individuals to raise concerns within the organization prior to seeking resolution outside the organization.

Additionally, no board member or volunteer shall be adversely affected because they refuse to carry out a directive, which, in fact, constitutes fraud, or is a violation of state or federal law.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Every effort will be made to protect the complainant's identity.

Anonymous Allegations

Individuals are encouraged to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Acting in Good Faith

Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates misconduct, dishonesty, or fraud. 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.

T & E Care reserves the right to modify or amend this policy at any time as it may deem necessary.

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