



## **ICCCC Whistleblower Policy**

**Effective Date:10/01/2009**

### **Purpose**

The Iowa Consortium for Comprehensive Cancer Control (ICCCC) is committed to high standards of ethical, moral and legal business conduct. The objective of this policy is to declare the ICCCC's commitment to open communication and provide an avenue for employees, directors and volunteers to raise concerns.

The ICCCC Whistleblower Policy establishes policies and procedures for:

- The submission of concerns regarding questionable accounting practices or legal or ethical conduct by any employee, director or volunteer of the organization, on a confidential basis
- The receipt, retention, and treatment of complaints received by the ICCCC
- The protection of employees and volunteers reporting concerns from retaliatory actions

### **Whistleblower Policy**

The ICCCC prides itself on its adherence to federal, state, and local laws and/or regulations, including business ethics policies. Pursuant to this policy, all employees, directors and volunteers are encouraged to raise concerns regarding:

- unlawful activity;
- activities that are not in line with ICCCC policy;
- any activity that constitutes serious improper conducts; or
- financial wrongdoing.

Financial wrongdoing may include, but is not limited to:

- questionable accounting practices;
- fraud or deliberate error in financial statements or recordkeeping;
- deficiencies of internal accounting controls;
- misrepresentations to Board of Directors, Funding agencies or auditors.

Any employee or volunteer who becomes aware of any violation or has justified suspicions should immediately report the violation to the Executive Director. The ICCCC will conduct an investigation and take appropriate action within a reasonable period of time. Such complaints will be held in confidence to the extent the needs of the investigation permit.



If the Executive Director is involved or is believed to be involved in the matter being reported, employees, directors or volunteers should report the situation to the President, Board of Directors.

#### Anonymous Allegations:

This policy encourages employees and volunteers to put their names to allegations to allow for appropriate follow-up questions and investigation to take place. Concerns expressed anonymously will be explored appropriately, 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.

#### Bad Faith Allegations:

Although the employee or volunteer is not expected to prove the truth of an allegation, he or she should be able to demonstrate to the person contacted that the report is being made in good faith. Allegations made in bad faith may result in disciplinary action.

### **Handling of Concerns**

The action taken by the ICCCC in response to a report of concern under this policy will depend on the nature of the concern. The executive director shall receive information on each report of concern and follow-up information on actions taken.

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

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

The ICCCC has the authority to retain outside legal counsel, accountants, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

### **Whistleblower Protection Policy**

If any employee, director or volunteer reports in good faith what he or she believes to be a violation of the law and/or financial wrongdoing to the ICCCC or to a federal, state, or local agency, it is the ICCCC's policy that there will be no retaliation taken against the complainant.

Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality. Harassment or victimization for reporting concerns under this policy will not be tolerated.