

Policy No.	3-32	This policy applies to:	
Policy Name:	Whistleblower Policy	✓	Board of Directors
Revised Date:		✓	Exempt
		✓	Non-exempt

The Board will ensure the Board and the CEO of CASA reflect the high ethics and strong reputation of CASA, correct each other when judgment errors occur and, if necessary, seek to remove offending members in accordance with the Bylaws. Problems that can threaten the reputation of CASA will be reported to the Board President and the CEO. No retaliation will be permitted by or to any person for reporting a problem or potential problem. This formal Whistleblower policy has been adopted by CASA and is aligned with the Internal Control policy 4-3.

A whistleblower is an employee who informs a supervisor or the CEO of CASA or President of the Board about an activity which that person believes to be fraudulent or dishonest.

Whistleblower Protection

CASA will protect whistleblowers as defined below.

1. CASA will use best efforts to protect whistleblowers against retaliation, as described below. It cannot guarantee confidentiality, however, and there is no such thing as an “unofficial” or “off the record” report.
2. CASA will keep the whistleblower’s identity confidential, unless
 - a) the person agrees to be identified;
 - b) identification is necessary to allow CASA or law enforcement officials to investigate or respond effectively to the report;
 - c) identification is required by law; or
 - d) the person accused of violations is entitled to the information as a matter of legal right in disciplinary proceedings.

CASA employees may not retaliate against a whistleblower with the intent or effect of adversely affecting the terms or conditions of employment (including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages). Whistleblowers who believe that they have been retaliated against may file a written complaint with the CEO of CASA or President of the Board, if retaliation is from the CEO of CASA. A proven complaint of retaliation will result in a proper remedy for the person harmed and the initiation of disciplinary action, up to and including dismissal, against the retaliating person. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors. Whistleblowers must be cautious to avoid baseless allegations.

Procedures

If any employee reasonably believes that policy, practice, or activity of CASA is in violation of law, that employee must file a written complaint with the CEO of CASA or the Board President, if the violation concerns the CEO.

It is the intent of CASA to adhere to all laws and regulations, which apply to it, and the purpose of this policy is to support CASA’s goal of legal compliance. The support of all employees is necessary to achieving compliance with

various laws and regulations. An employee is protected from retaliation only if the employee brings the alleged unlawful activity, policy, or practice to the attention of CASA and provides CASA with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement.

CASA will not retaliate against an employee who, in good faith, has made protest or raised a complaint against some practice of CASA, or of another individual or entity with whom the CASA has a business relationship, based on a reasonable belief that the practice is in violation of law, or a clear mandate of public policy.

CASA will not retaliate against employees who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of CASA that the employee reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.

Rights and Responsibilities

Supervisors are required to report suspected fraudulent or dishonest conduct to the CEO of CASA or President of the Board. In addition, supervisors are responsible for maintaining a system of management controls, which detect and deter fraudulent or dishonest conduct. Failure by a supervisor to establish management controls or report misconduct within the scope of this policy may result in adverse personnel action against the supervisor, up to and including dismissal.

Reasonable care should be taken in dealing with suspected misconduct to avoid:

- Baseless allegations.
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation.
- Violations of a person's rights under law.

Accordingly, a supervisor faced with a suspected misconduct:

- Should not contact the person suspected to further investigate the matter or demand restitution.
- Should not discuss the case with anyone other than the CEO or President of the Board or a duly authorized law enforcement officer.
- Should direct all inquiries from any attorney retained by the suspected individual to CEO or President of the Board and direct all inquiries from the media to the CEO.

SECTION 4

