

Teen Challenge Training Center WHISTLEBLOWER POLICY

1. Purpose.

The Teen Challenge Training Center (TCTC) requires board members, committee members, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities and to comply with all applicable laws and regulatory requirements.

2. Reporting Responsibility.

TCTC seeks to have an “Open Door Policy” and encourages all TCTC stakeholders to share their questions, concerns, suggestions or complaints regarding the organization and its operations with someone who can address them properly.

Employees and students are encouraged to report through the usual organizational structure (first level supervisor, second level supervisor, etc., executive director) should a concern arise. Employees or supervisors are permitted to contact the next higher level supervisor if a supervisor is the subject of their concern. All concerns must be presented in writing and signed by the reporting employee. A written response signed by the supervisor should be discussed with the employee as soon as is practical after acquiring all information deemed pertinent to the concern. If the employee believes that the concern has not been sufficiently investigated, recourse to the next higher level supervisor or executive director is available. If, following a review and response by the executive director, the concern is not satisfied, the employee may request in writing that the concern be presented to the Chairman of the Board.

Any non-employee stakeholder of TCTC, i.e. board member, committee member, volunteer, donor or student family member should present concerns to the Executive Director. All concerns must be presented in writing and signed by the reporting stakeholder. A written response signed by the Executive Director should be discussed with the reporting stakeholder as soon as is practical after acquiring all information deemed pertinent to the concern. If the concern was presented to the Executive Director and the response felt to be unsatisfactory, the stakeholder may request in writing that the Executive Director forward the concern to the Chairman of the Board. If the concern involves the Executive Direction, the Chairman of the Board should be contacted.

3. No Retaliation.

No TCTC stakeholder who in good faith reports a violation of law or regulatory requirement shall suffer harassment, retaliation or adverse employment consequence. Any employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within the TCTC organizational structure.

4. Compliance Office.

TCTC's Executive Director and the Chairman of the Board will act as TCTC's Compliance Office. The Compliance Office is responsible for investigating and resolving all employee concerns and allegations concerning violations of principles and/or law. The Board Chair or his or her designee will take on the Compliance Office role if the concern involves the Executive Director. If the concern involves both the Executive Director and Board Chair, outside legal counsel will carry out the functions of the Compliance Office.

5. Accounting and Auditing Matters.

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Executive Director shall immediately notify the Chairman of the Board of any such complaint and work with the Finance Committee until the matter is resolved.

6. Requirement of Good Faith.

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements 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.

7. Confidentiality.

Violations or suspected violations will be treated as confidential by the complainant and by TCTC. Violation of this confidentiality standard will be interpreted as a breach of good faith by the complainant. TCTC will keep reports of violations or suspected violations confidential to the extent possible, consistent with the need to conduct an adequate investigation.

8. Handling of Reported Violations.

The Compliance Office or the person responsible for carrying out the Compliance Office's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.