

# **Jamaica Outreach Program WHISTLEBLOWER POLICY**

## **1. Purpose.**

Jamaica Outreach Program requires board members, committee members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all directors, committee members and employees to comply with all applicable laws and regulatory requirements.

## **2. Reporting Responsibility.**

Jamaica Outreach Program seeks to have an “Open Door Policy” and encourages board members and employees to share their questions, concerns, suggestions, or complaints regarding the Jamaica Outreach Program and its operations with someone who can address them properly. In most cases, a board member or committee member should present his or her concerns to the Chair of the Board or the Misconduct Committee. If a board/committee member/employee is not comfortable speaking with the Board Chair or is not comfortable with the Board Chair’s response, the board member, committee member or employee is encouraged to speak with anyone on the Board whom the employee is comfortable in approaching, or to directly contact the Jamaica Outreach Program’s outside legal counsel, whose contact information can be obtained from the Secretary.

## **3. No Retaliation.**

No board member, committee member, or employee who in good faith reports a violation of a law or regulation requirement shall suffer harassment, retaliation, or adverse employment consequence. An 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 Jamaica Outreach Program prior to seeking resolution outside Jamaica Outreach Program.

## **4. Compliance Officer.**

Jamaica Outreach Program’s Misconduct Committee, working with the Chair of the Board, will act as Jamaica Outreach Program’s Compliance Officer. The Compliance Officer is responsible for investigating and resolving all board/committee/employee complaints and allegations concerning violations. The Board Chair or his or her designee will take on the Compliance Officer role if the complaint involves a member of the Misconduct Committee. If the complaint involves both the Misconduct Committee and Board Chair, the Board shall appoint another board member to carry out the functions of the Compliance Officer.

## **5. Accounting and Auditing Matters.**

The Auditing Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Audit Committee of any such complaint and work with the 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 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.

**8. Handling of Reported Violations.**

The Compliance Officer, or the person responsible for carrying out the Compliance Officer'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.