



## WHISTLEBLOWER POLICY

### INTRODUCTION

The PCL Promise adopted by People for Care and Learning requires all staff, board members, and volunteers to observe high moral standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of People for Care and Learning, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. Set forth below is People for Care and Learning's policy with respect to reporting good-faith concerns about the legality of propriety of People for Care and Learning's actions or plans.

### REPORTING OF CONCERNS OR COMPLAINTS

It is the responsibility of all staff, board members, and volunteers to comply with People for Care and Learning's PCL Promise and applicable law and to report violations or suspected violations in accordance with this Whistleblower Policy.

### CONFIDENTIALITY

People for Care and Learning will treat all communications under this policy in a confidential manner, except to the extent necessary 1) to conduct a complete and fair investigation, or 2) for review of People for Care and Learning operations by People for Care and Learning's board, its finance committee, People for Care and Learning's independent public accountants, and People for Care and Learning's legal counsel.

### RETALIATION

People for Care and Learning will not permit any negative or adverse actions to be taken against any employee or individual for making a good-faith report of a possible violation of its PCL Promise or applicable law, even if the report is mistaken, or against any employee or individual who assists in the investigation of a reported violation. Retaliations in any form will not be tolerated. Any act of alleged retaliation should be reported immediately and will be promptly investigated. An employee who retaliates against someone who has reported a violations in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within People for Care and Learning prior to seeking resolution outside the organization.

### HOW TO REPORT CONCERNS OR COMPLAINTS

Employees and others may communicate suspected violations of its PCL Promise and policies, applicable law, or other wrongdoing or alleged retaliation by contacting People for Care and Learning's Executive Director, Dr. Fred Garmon, at 423-478-7071 or [fgarmon@peopleforcare.org](mailto:fgarmon@peopleforcare.org) or the Chair of the Board of Directors, Dr. Bill George, at

[bgeorge@churchofgod.org](mailto:bgeorge@churchofgod.org). If you wish to remain anonymous, it is not necessary that you give your name or position in any notification.

Whether or not you identify yourself, for a proper investigation to be conducted, please provide People for Care and Learning with as much information as you can, sufficient to do a proper investigation, including where and when the incident occurred, names and titles of the individuals involved, and as much other detail as you can provide.

#### ILLUSTRATIVE TYPES OF CONCERNS

The following is a nonexhaustive list of the kinds of improprieties that should be reported:

- Supplying false or misleading information on People for Care and Learning's financial or other public documents, including its Form 990
- Providing false information to or withholding material information from People for Care and Learning's board or auditors
- Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal or state laws or regulations
- Altering, destroying, or concealing a document, or attempting to do so, with the intent to impair the document's availability for use in an official proceeding or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal or state law or regulations
- Embezzling, self-dealing, private inurement (i.e., People for Care and Learning's earnings inuring to the benefit of a director, officer, or employee) and private benefit (i.e., People for Care and Learning's assets being used by anyone in the organization for personal gain or benefit)
- Paying for services or goods that are not rendered or delivered
- Using remarks or actions of a sexual nature that are not welcome and are likely to be viewed as personally offensive, including sexual flirtations; unwelcome physical or verbal advances; sexual propositions; verbal abuse of a sexual nature; the display of sexually suggestive objects, cartoons, or pictures; and physical contact of a sexual or particularly personal nature
- Using epithets, slurs, negative stereotyping, and threatening, intimidating, or hostile acts that relate to race, color, religion, gender, national origin, age, or disability
- Discriminating against an employee or potential employee due to a person's race, color, religion, sex, sexual orientation, national origin, age, physical or mental impairment, or veteran status
- Violating People for Care and Learning's PCL Promise, Conflict of Interest Policy, and all other PCL Policies
- Facilitating or concealing any of the above or similar actions

#### QUESTIONS

If you have any questions regarding this policy, please contact Fred Garmon (Executive Director).