



## **PATH International Whistleblower Policy**

Amended by the NARHA Board: 8/23/2010  
Revised to show name change: July 2011

### **Purpose**

PATH Intl. (the Association) is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and PATH Intl.'s commitment to open communication, this policy aims to provide an avenue for employees, members, volunteers, and concerned individuals to raise concerns and the reassurance that they will be protected from reprisals or discrimination for whistleblowing. This Whistleblower policy is intended to assure protections for individuals who raise concerns regarding:

- incorrect financial reporting;
- unlawful activity;
- activities that do not comply with PATH Intl. policy;
- or
- activities that are construed as improper.

### **Safeguards**

**Harassment or Victimization** - Harassment or victimization for reporting concerns under this policy will not be tolerated.

**Confidentiality** - Every effort will be made to respect the complainant's identity with appropriate regard for confidentiality.

**Anonymous Allegations** - This policy encourages employees, members, volunteers, and concerned individuals to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be reviewed appropriately, and 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** - Allegations in bad faith may result in corrective action.

### **Procedure: 1. Process for Raising a Concern**

**Reporting**- The whistleblowing procedure is intended to be used for serious and sensitive issues. Such concerns including those relating to financial reporting or unethical or illegal conduct may be reported

directly to the PATH Intl. CEO or the President of the PATH Intl. Board of Trustees. Should the concern involve the CEO and President of the Board your concerns should be reported directly to the President elect or the Audit Chair. PATH Intl.'s general counsel will be consulted as deemed appropriate by the Board of Trustees.

**Employment-related** concerns for employees should continue to be reported through the channels outlined in the PATH Intl. employee handbook.

**Timing** - The earlier a concern is expressed, the easier it is to take action.

**Evidence** - Although the complainant is not expected to prove the truth of an allegation, the complainant should be able to demonstrate to the person contacted that the report is being made in good faith.

### **Procedure: 2. How the Report of Concern Will be Handled**

The action taken by PATH Intl. in response to a report of concern under this policy will depend on the nature of the concern. The Audit Committee of the PATH Intl. Board of Trustees shall receive information on each report of concern and follow-up information on actions taken. The Audit Committee's decision will be final.

**Initial Inquiries** - 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.

**Further Information** -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.

### **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 PATH Intl. financial or other public documents, including the 990 Form
- Providing false information to or withholding material information for PATH Intl. BOT or auditors
- Destroying, altering, mutilation, 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 law or regulations.
- Embezzling, self-dealing, private inurement and private benefit
- Paying for goods or services 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; the display of sexually suggestive objects cartoons or pictures ; and physical contact of a sexual or particularity personal nature.
- Using remarks or actions outside of one's job responsibilities to influence the outcome of a center's accreditation or an instructor's certification

- Using epithets, slurs, negative stereotyping, and threatening, intimidation, or hostile acts that relate to race, color, religion, gender, national origin, age or disability
- Violating PATH Intl. Code of Ethics, Conflict-of-Interest Policy, Harassment Policy, or Equal Employment Opportunity Policy.

If you have any questions regarding this policy, please contact PATH Intl. CEO at 303-452-1212