



WHISTLEBLOWER POLICY

Purpose: To clarify practices related to the reporting of suspected illegal acts or activities by members of the Board of Directors, the Community Advisory Committee and employees of the Foundation as it relates to Foundation business.

Adopted: September 19, 2005

Preamble: The REACH Healthcare Foundation (“REACH”) is fully committed to providing a workplace that is open to and fosters communication concerning all aspects of its organization and operations, including compliance with all applicable federal, state and local laws, regulations, rules and ordinances relating to corporate or financial misconduct and fraud (collectively, “Laws”). Toward that end, REACH has adopted this Policy to protect its employees from unlawful threats, discrimination, retaliation or discharge as a result of their lawful (i) reporting of, or providing or causing to be provided, information about what they reasonably believe to be corporate fraud or other violations, or possible violations, by REACH or its agents of any applicable Laws, or (ii) objecting to or refusing to participate in any such activity or practice, not only to accommodate, but to encourage, responsible whistleblowing. This Policy is not intended to address claims or allegations of harassment, sexual or otherwise, or discrimination in the workplace; those issues are covered in separate policies adopted by REACH.

Policy:

A. REACH designates the Vice Chair (the “Vice Chair”) of the Board of Directors of REACH (the “Board”) as the primary person responsible for receipt of any concerns or information that an employee reasonably believes represents or relates to a violation of any Law by REACH or its agents, including, without limitation, financial statement disclosures, accounting, internal accounting controls, and/or auditing matters (collectively, a “Concern”) and for administering this Policy.

B. If an employee is uncomfortable with discussing, or for any reason prefers not to submit to, or discuss a Concern with, the Vice Chair, the employee may instead choose to contact any other member of the Executive Committee of the Board to discuss the Concern.

In addition to the Vice Chair, the Executive Committee is composed of the Chair, the Secretary, the Treasurer, the Grants Committee Chair and the At-Large Member. For purposes of this Policy, any member other than the Vice Chair that receives a Concern is referred to as a “Primary Contact.”

C. Any employee of REACH may submit, on a confidential and anonymous basis if the employee so desires, any Concern that such employee reasonably believes relates to the violation of any Laws by REACH or its agents. Although a Concern may be initially discussed with the Vice Chair or any other Primary Contact, all Concerns must be set forth in writing and forwarded by U. S. mail or overnight courier in a sealed envelope (marked with the notation “PERSONAL AND CONFIDENTIAL COMMUNICATION – ADDRESSEE ONLY MAY OPEN – Submitted pursuant to the Whistleblower Policy”) to the Vice Chair or other Primary Contact, as the case may be. If being submitted anonymously, the employee should take particular care to provide sufficient information to allow a full investigation of the matter.

D. Upon receipt of a Concern, the Vice Chair or other Primary Contact, as the case may be, shall refer the Concern to the full Executive Committee, whereupon the Executive Committee will promptly and fully investigate the Concern so reported and take all necessary and appropriate remedial and disciplinary action to correct the Concern reported. In conducting such investigation and implementing subsequent remediation, the Executive Committee shall comply with all Laws regarding, and otherwise use reasonable efforts to protect, the confidentiality and anonymity of the reporting employee.

E. REACH may from time to time establish new and/or supplementary procedures and guidelines to assure compliance with the intent of this Policy as stated in the Preamble as well as with all applicable Laws.

F. There shall be no retaliation or discrimination of any kind against an employee who submits a Concern in good faith even if such Concern is ultimately determined to be unfounded; provided, however, the submission of a Concern based on information that the employee knows to be false or without a good faith, reasonable belief in its truth and accuracy is not protected by this Policy and may subject the reporting employee to disciplinary action up to and including termination of employment.

G. The Executive Committee shall retain as a part of its records all Concerns and information regarding the investigation and outcome thereof for a period of not less than seven (7) years.