



Whistleblower Policy

Equalize Health leadership expects the Board of Directors and staff to observe high standards of business and personal ethics in the conduct of their duties and responsibilities on behalf of the organization.

The objective of this policy is to establish policies and procedures for:

- The submission of concerns regarding violations of federal or state law or questionable accounting or auditing matters by employees, Board members or other staff on a confidential and anonymous basis.
- The receipt, retention and treatment of complaints received by the Board as described in the preceding paragraph.
- Protection from retaliatory actions against individuals who report Concerns to the Organization or its third party administrator.

DEFINITIONS

“Improper Conduct” shall mean any conduct that is in violation of proper accounting or auditing procedures, state or federal law or Organization Policies.

“Concern” shall mean a reasonable belief that a Board member or other individual authorized to act on behalf of the Organization may have engaged in Improper Conduct.

REPORTING RESPONSIBILITY

Each staff member, Board member and any individual engaged by the Board or the Organization’s management on behalf of the Organization is expected to report all Concerns of Improper Conduct.

All reported Concerns will be forwarded to the Chair of the Board of Directors Audit Committee - auditchair@EqualizeHealth.org. In all instances where this policy requires reporting to the Audit Committee Chair, if the Chair is involved in the Concern, then the Concern is to be reported to the Chairman of the Board of Directors. If both the Audit Committee Chair and Board of Directors Chairman are involved, the Concern shall be reported to the Organization’s counsel.

The Board shall be responsible for designating an investigator to make appropriate recommendations with respect to all reported Concerns. The Board shall ensure that the individual (or individuals) appointed to investigate are not involved in the conduct-giving rise to the reported Concern.

NO RETALIATION

This Policy is intended to encourage the raising of Concerns for investigation and appropriate action. No one who in good faith reports a Concern shall be subject to retaliation.

PROCEDURE FOR REPORTING CONCERNS

Concerns not requiring immediate corrective action should be submitted in writing to the Chair of the Audit Committee - auditchair@EqualizeHealth.org - for consideration at the next regularly scheduled

Board of Directors meeting. Alternatively, the Concern may be raised orally provided it is reflected in the minutes of the meetings of the Board of Directors. In time-sensitive cases, the Executive Director, Board of Directors Chairman or Audit Committee Chair may call for an emergency board meeting to address serious concerns.

INVESTIGATION FOR REPORTING CONCERNS

All non-frivolous reports will be promptly investigated by an individual designated by the Board. The investigator will make recommendations to the Board at the conclusion of the investigation. The Board has the authority to request advice of legal counsel, accountants, private investigators or any other resource deemed necessary to conduct a full

and complete investigation of the allegations. At the conclusion of the investigation a brief written report will be provided to the Board.

ACTING IN GOOD FAITH

Anyone reporting a Concern must act in good faith and have reasonable grounds for the Concern. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the prior knowledge that the allegations are false, will be viewed as a serious offense and grounds for termination or request to the appointing authority for removal of a Board member.

CONFIDENTIALITY

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible that is consistent with the need to conduct an adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and grounds for termination or request to the appointing authority for removal of a Board member.

SOCIAL MEDIA

Social media and work can mix in interesting and sometimes negative ways. It can be easy to screw up accidentally, so we wanted to put together a list of Do's and Don'ts to help with some things that might be non-obvious.

Don't post confidential information. Be very careful not to post Equalize Health's confidential or trade secret information to either a work or personal profile (like Facebook, Twitter, LinkedIn, etc.). Confidential and trade secret information may include non-public revenue performance data; confidential information about work-related projects; the development of systems, processes, or procedures; or internal reports, policies, procedures or other internal, business-related confidential communications.

Don't access porn, NSFW, or illegal content at work. Pretty straight forward.

Do be respectful of co-workers, customers and vendors. Don't post comments about co-workers, customers or vendors that are malicious, vulgar, obscene, threatening, intimidating, harassing, defamatory, or otherwise in violation of our policies against unlawful discrimination and harassment.

Do remember that even social media use on personal time/equipment can reflect on Equalize Health. We respect your right to free expression, but some speech has consequences, if you post something to Twitter that offends a lot of people, it is likely to damage Equalize Health's reputation. Please stay smart and be appropriate about what you say!

Do remember to state that these are your personal opinions, and not those of Equalize Health. If you are identified in a public setting (like a blog, Twitter, etc.) as a Equalize Health employee, use good judgment to make it clear that your personal opinions are your own.