

Health Ministries Association	Original Effective Date	7/23/2015
<b>Operations Manual - Policy and Procedure</b>	Current Effective Date	
Submission of Concerns	Dates Reviewed	

**Scope.** This Policy for the Submission of Concerns ("Policy") applies to Health Ministries Association ("Corporation") and its subsidiaries.

**Purpose.** The Corporation strives to maintain a workplace where directors, officers, employees and volunteers may promptly report any concerns regarding the Corporation's business practices, including suspected violations of law, ethical principles, or policy ("Concerns") by the Corporation, or by its directors, officers, employees and volunteers – without fear of reprisal. This Policy is intended to provide a mechanism for officers, directors, and employees to raise good faith Concerns and to protect those who report those Concerns from retaliation. It also is intended to encourage and enable employees and others to raise Concerns within the Corporation prior to seeking resolution outside the Corporation.

<u>**Reporting Responsibility.</u>** It is the responsibility of all directors, officers, employees and volunteers of the Corporation to promptly report any such Concerns.</u>

**Reporting Procedures.** A Concern should promptly be reported to the President. If the President is unavailable or involved in the Concern, then the Concern should be reported to Secretary.

**<u>Review of Concerns.</u>** Once a Concern is reported, it will be promptly reviewed to determine whether its subject matter falls within the scope of this Policy. If the Concern is determined not to fall within the scope of this Policy, it may be forwarded as appropriate for follow-up and possible investigation pursuant to any applicable policy or procedure.

**Investigation of Concerns.** Concerns within the scope of this Policy and/or reports of suspected retaliation will be investigated promptly and in a manner intended to provide confidentiality (to the extent practicable) consistent with the need to conduct an effective and complete investigation. The appropriate person will conduct or designate other internal or external parties, as the Corporation deems necessary, to conduct the investigation. Appropriate corrective action will be taken if warranted by the investigation. The investigating party will, as appropriate, directly notify the reporting individual of his/her findings.

**No Retaliation.** No director, officer, employee or volunteer who in good faith reports a Concern or who in good faith participates in the investigation into a Concern, will suffer harassment, retaliation, or other adverse employment consequence due to the reporting of a Concern or the participation in the investigation into a Concern. A director, officer, employee or volunteer who retaliates against someone who in good faith has reported a Concern or who in



good faith participated in the investigation into a Concern is subject to discipline up to and including termination of employment or removal from office.

The Corporation is voluntarily adopting this Policy. No additional cause(s) of action against the Corporation (other than those already provided by law) will result from the adoption of this Policy.

Policy provided by: Frost Brown Todd LLC, 2/2015