



WHISTLEBLOWER POLICY

Effective Date: 03/01/2014

The purpose of this Whistleblower Policy is to create an ethical and open work environment, to ensure that Accra has a governance and accountability structure that supports its mission, and to encourage and enable employees of Accra to raise legitimate concerns about the occurrence of illegal or unethical actions within Accra instead of turning to outside parties for resolution.

This policy is intended to apply to employees who report activities they consider to be illegal, unethical, or dishonest to one or more of the individuals specified in this policy.

Whistleblowers should not feel responsible for formally investigating the activity or for determining fault or corrective measures. Instead, as discussed below, appropriate management officials are charged with these responsibilities.

Examples of illegal, unethical, or dishonest activities include, but are not limited to, such things as:

- Violations of federal, state or local laws
- Activities that potentially violate health care reform laws
- Theft or inappropriate removal or possession of property
- Unethical, immoral, or criminal conduct in or outside of the workplace
- Falsification of timekeeping records
- Violation of OSHA or other regulatory standards
- Sexual or other unlawful or unwelcome harassment
- Unauthorized disclosure of business "secrets" or confidential information

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or Employee Services. Employee Services will be responsible for investigating any concerns, as well as determining the proper course of corrective action. If an employee in Employee Services is the subject of the whistleblower complaint, another member of senior management will become responsible.

Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. Accra will not retaliate, nor permit retaliation against a whistleblower who brings forward a legitimate concern under this policy. Any whistleblower who believes he/she is being retaliated against must contact Employee Services immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Employees must exercise sound judgment to avoid baseless allegations. Employees who intentionally or recklessly file a false or baseless report of wrongdoing will be subject to discipline up to and including termination. Employees with any questions regarding this policy should contact their supervisor, or Employee Services. Accra also has a Whistle Blower Hotline number: 1-855-612-4453.