



Whistle-Blower and Anti-Retaliation Policy

GENERAL POLICY STATEMENT

Health Forward Management is responsible for establishing the culture, environment, and training of its employees and board members necessary to assess fraud risks, implement internal controls and monitor activities to prevent and detect misappropriation of assets and intentional material misrepresentation of financial or other data that would constitute fraud.

This whistle-blower policy is intended to protect reporting parties from any form of retaliation or retribution. This includes board members, staff, vendors, grantees and others (“whistleblowers”) who become involved in the discovery, reporting, or investigation of potential fraud, or violations of the organization’s financial policies and procedures, ethics policies, or conflict of interest policies.

It is management’s responsibility to communicate this policy to board members, employees, grantees, vendors, and contractors.

DEFINITION OF A WHISTLE-BLOWER

A whistle-blower is defined as any individual, inside or outside the organization, who provides information regarding concerns of accounting or auditing improprieties, fraud, breaches of ethical policies, or conflicts of interest involving a Health Forward employee, board member, volunteer, vendor, contractor, grantee or other individual involving such persons acting business or activities with or for Health Forward.

EXAMPLES OF FRAUD AND OTHER UNETHICAL ACTS

Employees, Board Members:

- Thefts of any kind, including cash, securities, merchandise, equipment, supplies or other Health Forward assets.
- Destruction, removal, and/or inappropriate use of records, furniture, fixtures, or other Health Forward resources.
- Submission to Health Forward Foundation of invoices for payment or receipts for reimbursement that are fictitious or that include knowingly inflated amounts.

- Forgery or fraudulent alteration of any check, bank draft, statement, billing, record, form, report, return or other financial document in the course of performing duties for Health Forward.
- Intentional material misclassification, misrepresentation or omission of revenues, expenses, costs or other data in financial statements, reports, regulatory returns, applications, or other communications related to Health Forward business.
- Accepting or seeking anything of material value from contractors, vendors or others that is connected to the performance of duties for Health Forward. Exception: Gifts of de minimis value.
- Self-dealing, private inurement, and private benefit (i.e. foundation assets being used for person gain or benefit).
- Violations of applicable laws and regulations that govern Foundation operations.
- Violations of ethical behavior as described in Health Forward's Employee Handbook.
- Violations of Health Forward's Conflict of Interest Policy.
- Planning, facilitating or intentionally concealing any of the above.

Grantees:

- Use of grant funds for expenses not authorized in grant agreement or submitted project budgets.
- Fraudulent or misleading representations on a grant application, supporting documents, or related progress reports.
- Bribery of or collusion with Health Forward associates or board members to secure grant funding.

Vendors / Contractors:

- Submission of fictitious or inflated invoices/receipts or colluding with Health Forward associate or board member regarding the same.
- Forgery or fraudulent alteration of any contract, check, bank draft, statement, billing, record, form, or other financial document.
- Fraudulent or misleading representations on any materials or content created on the behalf to the Foundation in the scope of completing contracted services.

SCOPE OF POLICY

This policy applies to Health Forward board members, employees, vendors, contractors, grantees, and others doing business with the organization.

Concerns about a Health Forward employee's moral or behavioral conduct related to Health Forward business should be reported to and resolved by their direct supervisor.

Concerns about the moral or behavioral conduct of a board member, grantee, vendor, or consultant; that is unrelated to Health Forward Foundation business, is not covered by this policy. Whistleblower reports of this nature will be referred to Health Forward Foundation CEO/President for review and disposition.

All reports of possible unlawful, fraudulent, or unethical activities related to Health Forward resources by Health Forward staff, board members, grantees, grantee staff, vendors, and contractors are covered by this policy.

All reports of possible fraudulent or unethical activity will be investigated without regard to the suspected perpetrator's length of service, position/title, or relationship to the organization.

REPORTING RESPONSIBILITIES AND SAFEGUARDS

Reporting parties, as defined in this policy should report observed or suspected unethical or fraudulent activity immediately to the Chair of the Audit Committee and Chair of the Board. If the suspected activities pertain to the actions of either the Audit Chair or the Board Chair, alternate contacts include the CEO, CAFIO, and Chair of the Governance Committee.

Health Forward uses a third-party reporting service, Red Flag Reporting, to receive complaints via online, text, phone call, email, mail, or fax. All reporting methods allow for secure and anonymous reporting. Hotline links and contact information is provided on Health Forward's website through the *Whistleblower Complaint* link at the bottom of each page.

Unless blocked by a reporting party, submitted reports are automatically routed to the current Audit Committee Chair, Board Chair, and Chief Administrative, Financial, and Investment Officer. These individuals have authority to forward concerns to management or other governing committees as they deem appropriate. This fraud-control and whistleblower policy is not meant to usurp reporting mechanisms in place for concerns extraneous to the scope of this policy, e.g., sexual harassment or other unlawful discrimination.

No reporting party who in good faith reports such a matter will suffer harassment, retaliation, firing, demotion, suspension, loss of work, impact on grants or fees or any other adverse consequences by the

Health Forward Foundation. Any board member or employee who harasses or retaliates against the reporting party is subject to discipline up to and including termination of employment, or removal from board. Additionally, no board member or employee will be adversely affected because they refuse to carry out a directive which they in good faith believe constitutes fraud or violation of state or federal law.

Complainants who believe that they have been retaliated against may file a written complaint with the CEO or Board Chair. Any complaint of retaliation will be promptly investigated, and appropriate corrective measures taken if allegations of retaliation are substantiated, up to and including termination or removal. Any allegation that proves to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense and subject to discipline up to and including termination of employment or removal from board.

Protection from retaliation is not intended to prohibit supervisors from acting, including disciplinary action, in the usual scope of their duties and based on valid performance, conduct or attitude issues.

CONFIDENTIALITY

All information received from the reporting party will be treated as confidential. Every effort will be made to keep the identity of the reporting party confidential, consistent with the need to conduct an adequate and fair investigation. Allegations will not be discussed with anyone other than those who have a legitimate need to know. It is important to protect the rights of the persons accused, to avoid damaging their reputation should they be found innocent and to protect the organization from potential liability. Accordingly, the Foundation cannot promise complete confidentiality, but it will act as discreetly as possible.

The reporting party should be informed of the following:

- Do not contact the suspected individual in effort to determine facts, personally conduct investigations, interviews or interrogations related to the alleged fraudulent activity.
- Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the investigating body.

INVESTIGATION RESPONSIBILITIES

The Audit Committee has the primary responsibility for investigation of all suspected fraudulent or unethical acts as defined in this policy. The Chair of the Audit Committee will acknowledge receipt of the concern within 10 business days (if it was not submitted anonymously). The Audit Committee has authority to retain outside legal counsel, accountants, private investigators, or any other resource necessary to conduct a thorough investigation. Any disposition of a whistleblower investigation will be reported to appropriate designated personnel and the Executive Committee of the Board of Directors through the Audit Committee with

notice to the Board of Directors.

Decisions on corrective actions to include referral of investigation findings to an appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel, Health Forward Executive Committee, Health Forward CEO, and Health Forward's CAFIO, as will final decisions on disposition of a Grantee related investigation.

Investigations may include but is not limited to examining, copying and/or removing all or a portion of the contents of computers, computer files, disks, tapes, other electronic storage devices, files, desks, cabinets and other facilities of the organization without prior knowledge or consent of any individual who may use or have custody of such items or facilities when it is within the scope of the investigation.

Communications regarding investigation of alleged activities must be handled with great care and discretion. No information concerning the status of an investigation will be disclosed. The proper response to any inquiry is: "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference.

TERMINATION/DISCIPLINARY ACTIONS

If an investigation results in a recommendation to terminate an individual or other appropriate disciplinary action, the recommendation will be reviewed for approval by the employee's manager, human resources, President & CEO, Board & Audit Chair, and by legal counsel, before any such action is taken.

ADMINISTRATION

Health Forward Foundation CEO and CAFIO are responsible for the administration, and application of this policy. The policy will be reviewed annually and revised as needed under the oversight and approval of the Audit Committee.