

IGHLP Inc. Whistleblower Protection Policy

The Independent Group Home Living Program Inc. (hereinafter the "Corporation") maintains internal controls and operating procedures intended to detect and prevent or deter improper activities. However, even the best systems of control cannot provide absolute safeguards against irregularities. Intentional and unintentional violations of laws, regulations, policies and procedures may occur and may constitute improper activities. Every employee, member, consultant and independent contractor of the Corporation has a responsibility to report any suspected improper activities to an officer of the Corporation.

A whistleblower as defined by this policy is an employee, member, consultant or independent contractor of the Corporation who reports an activity that he/she considers in their sound judgment to be unethical, illegal or dishonest. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of unethical, illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If an employee, member, consultant or independent contractor has knowledge of or a concern of an unethical, illegal or dishonest activity, the individual is to contact an officer of the Corporation's Board of Directors. The individual must exercise sound judgment to avoid baseless allegations. The complaint may be sent anonymously to the officer of the Board. If a whistleblower chooses to file an anonymous complaint, it is important to include all the relevant details because the investigator may not have the opportunity to ask for more information.

Whistleblower protections are provided in two ways: (i) through confidentiality and (ii) through assurances against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. In addition, the Corporation will not retaliate against a whistleblower who discloses suspected unethical, illegal or dishonest activity in good faith. To the best of its ability, the Corporation will also protect a whistleblower against retaliation by any other Corporation employee, member, consultant or independent contractor. Any whistleblower that believes he/she is being retaliated against must contact an officer of the Corporation's Board immediately. The right of a whistleblower from protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated. However, the fact that he/she reported the incident will be given consideration by the Corporation in any resultant disciplinary action.

Please note that any employee, member, consultant or independent contractor who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Employees, members, consultants and independent contractors with any questions regarding the Whistleblower Protection Policy should contact the Compliance Officer, Frank Lombardi at 631-878-8900 ext. 102.