



Employee Protection (Whistleblower) Policy

It is the intent of SCRLC to adhere to all laws and regulations that apply to the Council and the underlying purpose of this policy is to support SCRLC's goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations.

If any employee reasonably believes that a policy, practice, or activity of the Council is in bona fide violation of law, a written complaint must be filed by that employee with the Executive Director. Such reports should be directed to the Executive Director unless he/she is implicated in the complaint in which case the report should be directed to the President of the Board of Directors.

An employee shall be protected from retaliation only if the employee brings the alleged bona fide unlawful activity, policy, or practice to the attention of SCRLC and provides the Council with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement.

SCRLC will not retaliate against an employee who in good faith has made a protest or raised a complaint against some policy, practice, or activity of the Council, or of another individual or entity with whom SCRLC has a business relationship, on the basis of a bona fide reasonable belief that the practice is in violation of law or a clear mandate of public policy.

SCRLC will not retaliate against an employee who discloses to a supervisor and a public enforcement body, any activity, policy, or practice of the Council that the employee reasonably believes is a bona fide violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate of public policy concerning the health, safety, welfare, or protection of the environment.

Notwithstanding the above, it is the clear preference of SCRLC that an employee who believes that some policy, practice, or activity of the Council is in violation of the law attempt to resolve the concern internally with SCRLC prior to disclosing his/her allegations to, or raising or filing any complaints with, any external public body or official.

Notwithstanding the above, no concerned employee or whistleblower should expect protection under this policy if he/she knowingly initiates, facilitates, supports, conceals, or is otherwise complicit in the illegal policy, practice, or activity that is the subject of his/her disclosure, protest, or complaint unless his/her complicity is itself prompted by duress or is motivated by reasonable fear of some form of retaliation.

This policy does not protect any employee acting in bad faith or under a mere suspicion; who is deliberately dishonest; or has personally garnered financial profit or some other advantage to which he/she is not legally entitled. As such, no concerned employee or whistleblower disclosing, protesting, or complaining about an allegedly illegal policy, practice, or activity, or

another employee that is complicit in any such policy, practice, or activity, should expect protection under this policy if his/her actions in raising his/her concerns are in bad faith, mere suspicion, deliberately dishonest, or intended to garner financial profit, or some other advantage, to which he/she is not legally entitled.

For the purposes of this policy bona fide shall mean, in addition to its vernacular definition, that the employee has some actual evidence rather than a mere suspicion that the policy, practice, or activity is an actual violation of a law or a regulation of a public enforcement body.

Approved by the Board of Trustees March 21, 2014

Amended and approved by the Board of Trustees March 31, 2017