



COLUMBIA COUNTY PATHWAYS TO RECOVERY

PO Box 486 GHENT NY 12075

Whistleblower Policy

General

Columbia Pathways To Recovery, Inc. requires Directors, Officers and Employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As Directors, Officers and Employees of Columbia Pathways To Recovery, Inc., we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all Directors, Officers and Employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No Director, Officer or Employee, who in good faith reports an ethics violation, shall suffer harassment, retaliation or adverse employment consequence. A Director, Officer or Employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or termination of their term of Office. This Whistleblower Policy is intended to encourage and enable Directors, Officers and Employees and others to raise serious concerns within Columbia Pathways To Recovery, Inc. prior to seeking resolution outside Columbia Pathways To Recovery, Inc..

Reporting Violations

Columbia Pathways To Recovery, Inc. has an open door policy and suggests that Directors, Officers and Employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, a member of the Executive Committee is in the best position to address an area of concern. However, if you are not comfortable speaking with that Committee or you are not satisfied with the response, you are encouraged to speak with someone on the Governance Committee. Directors and Officers are required to report suspected ethics violations to Columbia Pathways To Recovery, Inc.'s Governance Committee, who has responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or are uncomfortable with following the Columbia Pathways to Recovery open door policy, individuals should contact the President directly.

Governance Committee

Columbia Pathways To Recovery, Inc.'s Governance Committee is responsible for investigating and resolving all reported complaints and allegations concerning violations and shall advise the President.

COLUMBIA PATHWAYS TO RECOVERY IS A COMMUNITY COMMITTED TOWARD BUILDING THE MANY PATHWAYS TO STRATEGIES AND SOLUTIONS FOR THE ADDICTION CRISIS IN COLUMBIA COUNTY, NY.

columbiapathwaystorecovery.org | info@columbiapathwaystorecovery.org | (518) 966-2775



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Accounting and Auditing Matters

The Governance Committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Governance Committee shall immediately notify the President of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The President will notify the sender and acknowledge receipt of the reported violation or suspected violation within ten business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Printed Name: _____ Date: _____

Signature: _____ Position: _____

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