

Colorado Dental Association

WHISTLEBLOWER POLICY

General

The Colorado Dental Association (CDA) requires board members, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the organization, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations.

In addition, the CDA will investigate any suspected fraudulent or dishonest use or misuse of the CDA's resources or property by staff, board members, consultants, or volunteers.

Staff, board members, consultants, and volunteers are encouraged to report suspected unethical, fraudulent or dishonest conduct (i.e., to act as a "whistleblower"), pursuant to the procedures set forth below.

Reporting Responsibility

It is the responsibility of all board members, officers, and employees to comply with the highest level of professional conduct and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No board member, officer, or employee who in good faith reports a violation of business or personal ethics shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations

The CDA maintains an open-door policy and suggests that employees and volunteers share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the executive director or the CDA president, depending upon who you are comfortable approaching. Supervisors and managers are required to report suspected violations to the executive director who has specific and exclusive responsibility to investigate all reported violations.

Accounting and Auditing Matters

The Finance Council of the board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The executive

director shall immediately notify the treasurer and Finance Council of any such complaint and work with the council until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint 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. Those individuals who make anonymous complaints must recognize the limitations this places on the organizations ability to research and investigate their complaint.

Handling of Reported Violations

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.