



## CVMA Whistleblower Policy

### General

The Chicago Veterinary Medical Association (CVMA) requires members, staff, independent contractors, and others representing the organization to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the organization, these individuals are expected to be committed to honesty and integrity in fulfilling their responsibilities and to comply with all applicable laws and regulations.

### Whistleblower Definition

The Whistleblower Policy relates to an employee, consultant, or volunteer who informs about an activity relating to the Chicago Veterinary Medical Association which that person believes to be fraudulent or dishonest.

### Illustrative Types of Concerns

The following is a non-exhaustive list of the kinds of improprieties that should be reported:

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of computer files
- Fraudulent financial reporting or other public documents
- Pursuit of a benefit or advantage in violation of the Conflict-of-Interest Policy
- Misappropriation or misuse of resources, such as funds, supplies, or other assets
- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked
- Providing false information to or withholding material information from the board or auditors
- Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal or state law or regulations
- Altering, destroying, or concealing a document, or attempting to do so, with the intent to impair the document's availability for use in an official proceeding or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal or state law or regulations
- Embezzling, self-dealing, private inurement (i.e., CVMA earnings inuring to the benefit of a director, officer, or senior management) and private benefit (CVMA's assets being used by anyone in the organization for personal gain or benefit)
- Paying for services or goods that are not rendered or delivered
- Using remarks or actions of a sexual nature that are not welcome and are likely to be viewed as personally offensive, including sexual flirtations; unwelcome physical or verbal advances; sexual propositions; verbal abuse of a sexual nature; the display of sexually suggestive objects, cartoons, or pictures; and physical contact of a sexual or particularly personal nature.

- Using epithets, slurs, negative stereotyping, and threatening, intimidating, or hostile acts that relate to race, color, religion, gender, national origin, age, or disability
- Circulating or posting written or graphic material in the workplace that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, nationality, age, or disability
- Discriminating against an employee or potential employee due to a person's race, color, religion, sex, sexual orientation, national origin, age, physical or mental impairment, or veteran status
- Violating any of CVMA's formal policies including, but not limited to, ethics and conduct, confidentiality, conflict of interests
- Interfering in and obstructing the business of CVMA
- Facilitating or concealing any of the above or similar actions

### Reporting

All members, employees, volunteers, independent contractors, and others representing the organization have the responsibility to report violations or suspected violations, dishonest conduct, or fraudulent use or misuse of CVMA's resources, by staff, board members, consultants, or volunteers in accordance with this Whistleblower Policy.

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property should be reported to CVMA's Executive Director. If, for any reason, a person finds it difficult to report his or her concerns to the Executive Director, the person may report the concerns to the President of the Board of Directors. Alternately, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement sent via land mail to the appropriate person may be submitted.

### No Retaliation

No member, staff member, volunteer, or consultant who in good faith reports a violation 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.

### 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

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### Rights and Responsibilities

Due to the important yet sensitive nature of the suspected violations, effective professional follow-up is critical. While appropriately concerned about "getting to the bottom" of such issues, individuals should

not in any circumstances perform any investigative or other follow-up steps on their own. Accordingly, an individual who becomes aware of suspected misconduct

- Should not contact the suspected person to further investigate the matter or demand restitution
- Should not discuss the case with attorneys, the media, or anyone other than the Executive Director or, if appropriate, the Board President
- Should not report the case to an authorized law enforcement officer without first discussing the case with the Executive Director or, if appropriate, to the Board President.

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#### Investigation

All relevant matters, including suspected but unproved matters, will be reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken, if necessary. Investigations may warrant investigation by independent people such as auditors and/or attorneys.

