

**THE BOARD OF DIRECTORS OF THE
COLLEGE ON PROBLEMS OF DRUG DEPENDENCE, INC.
WHISTLEBLOWER POLICY**

Purpose of Policy

The College on Problems of Drug Dependence, Inc. (CPDD) requires its officers, directors, staff, members and volunteers to maintain the highest standards of honesty, integrity and fairness. This Whistleblower Policy is intended to encourage and enable everyone involved with CPDD to raise serious concerns of impropriety, or fraudulent or dishonest use or misuse of the organization's resources or property. CPDD is committed to investigating allegations of inappropriate conduct and actions, and taking corrective action when necessary.

Reporting Responsibility

It is the responsibility of all officers, directors, staff, volunteers and members of the College to report concerns about suspected improper conduct, including violations of CPDD's policies, fraudulent or dishonest conduct, misuse of CPDD's funds or property, or violations of law or regulations that govern CPDD's operations.

Reporting Procedure

A person's concerns regarding any suspected improper conduct should be reported to one of the following: (a) Employees and volunteers should report to the Executive Officer; (b) Officers, directors, and members should report to the President. This policy does not require reporting the improper conduct to any individual who is or may be involved in it. If for this or any other reason, a person finds it uncomfortable or difficult to report his or her concerns to the official listed above, he/she may report the concerns directly to the President or President-Elect.

Investigation

All information received under this policy will be thoroughly and promptly investigated. The Executive Officer would normally take the lead in an investigation unless he or she is the subject of the concern. In that event, a director will be designated by the President to investigate and resolve a complaint. No person who has been accused in the report will participate in the investigation or resolution of the complaint.

The Executive Officer or other official leading the investigation will document the receipt, investigation, and treatment of the allegations. A written report will also be prepared and submitted to the Executive Committee. Appropriate corrective action will be taken, if necessary or appropriate, and findings may be communicated to the reporting person, if appropriate. Investigations may be conducted by independent persons such as auditors and/or attorneys. All actions of the Executive Officer or other person in receiving and investigating the report shall endeavor to protect the confidentiality of all persons entitled to protection.

Confidentiality

Reports of suspected improper conduct or violations may be submitted on a confidential basis. They will be kept confidential to the extent possible, consistent with the need to conduct an

adequate investigation. If the person making the report wishes to remain anonymous, a written statement may be submitted to one of the individuals listed above.

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 reported indicates a violation. In such event the person making the report shall be entitled to protection against retaliation.

However, any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false, or with reckless disregard for the truth, will be viewed as a serious violation of this policy as well. Any person judged to have not acted in good faith will be disciplined in a manner and to a degree as determined by the Board of Directors or its designee(s).

No Retaliation

It is contrary to the values of the CPDD for anyone to retaliate against, intimidate, harass, or take other adverse action against any director, officer, employee, member, or volunteer who in good faith reports, or threatens to report, any activity, conduct, policy or practice that the complainant reasonably believes may be improper conduct pursuant to this policy. An employee who retaliates against someone who has protested or reported improper conduct in good faith is subject to discipline up to and including termination of employment. Similarly, CPDD officers, directors, or members who retaliate or discriminate against a whistleblower are in violation of this policy, with appropriate actions to be taken by the Board of Directors, including possible termination of membership.

Dissemination of Policy

This policy shall be disseminated in writing to all CPDD officers, directors, and employees, and placed on the CPDD website. A copy will also be posted in CPDD's offices.

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