



## **Policy on Suspected Misconduct, Dishonesty, Fraud, and Whistle-Blower Protection**

Bright Hope is committed to the highest possible standards of ethical, moral, and legal conduct. Consistent with this commitment, this policy allows employees to raise concerns about suspected misconduct, dishonesty, and fraud and to provide reassurance that they will be protected from reprisals for whistleblowing in good faith.

### **PROCEDURE**

#### **Reporting**

Employees and any other person (“reporter”) who has a concern relating to suspected misconduct, dishonesty or fraud may make a report. Bright Hope wants to hear of possible problems in these areas. Every effort will be made to protect the identity of the reporter to the greatest extent possible. Completely anonymous reports will be accepted but a full investigation may be hindered by the inability to gather additional facts and information from the reporter. The credibility of an anonymous complaint may also affect the investigation process.

Examples of matters to be reported under this policy include: financial reporting, accounting, internal accounting controls, auditing matters, or any other form of misconduct, dishonesty, or fraud. Please note that any matters that are clearly covered under our separate Human Resources policy manual will be handled by the process outlined therein and are not covered by this policy.

Concerns or suspected misconduct, dishonesty or fraud may be reported by telephone, email or in writing at the employee’s or reporter’s preference to the following officials:

C.H. Dyer, President/CEO at 224-520-6100 or [CHDyer@BrightHope.org](mailto:CHDyer@BrightHope.org)

Board Chairperson, Jennifer Soderquist, at [Jennifer.Soderquist@BrightHope.org](mailto:Jennifer.Soderquist@BrightHope.org)

Address: Bright Hope, 2060 Stonington Avenue, Hoffman Estates, IL 60169

#### **Timing**

The earlier a concern is expressed, the easier it is to take action.

#### **Good Faith**

It is expected that all reports provided in accordance with this policy will be made in good faith. This can include situations where there is a reasonable basis for suspicion without having conclusive evidence. However, any reports that are knowingly false and/or made with malicious intent and a reckless disregard for the truth will be disciplined accordingly.

## **Investigating the Concern**

Following the receipt of any complaints submitted, Kevin Currid will investigate the matter. If Kevin is the subject of the complaint, the investigation may be handled by our external auditors, Dickeson & Haney, LLC. The Board of Directors may also choose to have a separate party altogether investigate the report. A report of the investigation will be delivered to the full Board of Directors who will investigate each matter so reported and take corrective and disciplinary actions where appropriate.

## **Communication with Reporter**

The amount of contact between the reporter and those investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the reporter. The reporter will be given the opportunity to receive follow-up on their concern within a reasonable time frame:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling them whether initial inquiries have been made; and
- Telling them whether further investigations will follow, and if not, why.

## **Information**

Subject to legal constraints the reporter will receive information about the outcome of any investigations.

## **Document Retention**

The Board of Directors shall retain records of the complaints or concerns for a period of at least seven years.

## **SAFEGUARDS**

### **No Retaliation**

No director, officer, or employee or other person 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 policy is intended to encourage and enable employees and others to raise concerns within the organization prior to seeking resolution outside the organization.

Additionally, no employee shall be adversely affected because they refuse to carry out a directive which, in fact, constitutes corporate fraud, or is a violation of state or federal law.

## **DEFINITION OF TERMS**

For purposes of this policy, the definition of misconduct, dishonesty, and fraud includes but is not limited to:

- Acts which are inconsistent with ministry policy
- Theft or other misappropriation of ministry assets
- Misstatements or other irregularities in ministry records
- Incorrect financial reporting
- Misuse of ministry resources
- Illegal activities
- Immoral or unbiblical activities
- Forgery or alteration of documents
- Any other form of fraud

*Bright Hope reserves the right to modify or amend this policy at any time as it may deem necessary.*