Texas Orthopaedic Association
Whistleblower Policy

Purpose
The Association is committed to high standards of ethical, moral and legal business conduct. In line with this commitment and association's commitment to open communication, this policy provides an avenue for employees to raise concerns. It also provides reassurance that employees will be protected from reprisals or victimization for whistleblowing. (For purposes of this policy, an employee is defined as any individual who is paid for providing services to association headquarters and includes both full-time and part-time employees.)

This whistleblowing policy is intended to offer protections if an employee raises concerns regarding association, including concerns regarding:

• incorrect financial reporting;
• unlawful activity;
• activities that are not in line with association policy; or
• any other activities that constitute serious improper conduct.

Safeguards
Harassment or Victimization - Harassment or victimization for reporting concerns under this policy will not be tolerated.

Confidentiality - Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

Anonymous Allegations - This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:
The seriousness of the issue raised;
The credibility of the concern; and
the likelihood of confirming the allegation from attributable sources.

Bad Faith Allegations - Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person contacted that the report is being made in good faith. Allegations made in bad faith may result in disciplinary action.

Procedure: 1. Process for Raising a Concern
Reporting- The whistleblowing procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to the association General
Counsel:

Andrea Schwab, JD

Employment-related concerns should continue to be reported through your normal channels such as to a supervisor or the CEO.
Timing - The earlier a concern is expressed, the easier it is to take action.

Procedure: 2. How the Report of Concern Will be Handled
The action taken by association in response to a report of concern under this policy will depend on the nature of the concern. The Audit Committee of the association's Executive Committee shall receive information on each report of concern and follow-up information on actions taken.

Initial Inquiries - Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

Further Information -The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.