

Policy Title:	WHISTLEBLOWER	Effective Date: Sept 2009
Regulation Reference:	IRS and Medicaid	Revisions: NEW
Purpose:	To provide a mechanism for members to raise good-faith concerns regarding suspected violations of law on the part of Ardmore Enterprises.	Board Review(s): 9/19/08

Policy

Ardmore Enterprises' Code of Ethics requires Directors, Officers and staff to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As Board Members and staff of Ardmore, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Procedure/Process

1. REPORTING RESPONSIBILITIES

It is the responsibility of all Directors, Officers and Staff to detect and prevent fraud, waste, financial improprieties and corruption and to report violations or suspected violations in accordance with this Whistleblower Policy.

2. NO RETALIATION

No director, officer, or staff who in good faith reports a violation of fraud, waste, financial improprieties or corruption shall suffer harassment, retaliation, or adverse employment consequence. A supervisor who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal from the Board. This Whistleblower Policy is intended to encourage and enable staff and others to raise serious concerns within Ardmore.

3. REPORTING VIOLATIONS

Ardmore Enterprises has an open door policy and suggests that staff share their questions, concerns, suggestions or complaints related to suspected fraud or waste with someone who can address them properly. In most cases, a staff member's immediate supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or not satisfied with your supervisors' response, you are encouraged to speak with the Human Resources or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations to the Director of Quality Assurance. If you are not comfortable speaking with an Ardmore manager or supervisor, you can [send an e-mail to Ardmore's Board of Directors by clicking here](#).

4. COMPLIANCE OFFICER

Office of Quality Assurance is responsible for investigating and resolving all reported complaints and allegations concerning violations of fraud, and waste and shall advise the CEO of all such allegations. In the event, the allegation of fraud is against the CEO the Office of Quality Assurance has direct access to the Treasurer of the Board who will be responsible for the investigation.

5. ACCOUNTING AND AUDITING MATTERS

The Finance Committee/Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing or fraud complaints against the President. In the event, the complaints are against the Treasurer the Board President will appoint a committee and investigate and render recommendations.

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6. ACTING IN GOOD FAITH

Anyone filing a complaint concerning a violation or suspected violation of the Code relative to fraud and waste must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegation that prove not to be substantiated and which prove to have been made maliciously or knowing to be false will be viewed as a serious disciplinary offense which can include termination.

7. CONFIDENTIALITY

Violations or suspected violations may be submitted on a confidential basis by the complaint. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

8. HANDLING OF REPORTED VIOLATIONS

The Office of Quality Assurance or the Board Treasurer will notify the sender and acknowledge receipt of the report violation or suspected violation within seven business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.