

CRRL does not currently have a Whistleblower Policy and is proposing adoption of the VRSA sample policy with the non-substantive changes reflected here.

Final proposed policy:

## **WHISTLE BLOWER POLICY**

A whistle blower is defined as an employee who reports an activity that they considered to be illegal or dishonest to one or more of the parties specified in this Policy. The whistle blower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities. Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact a supervisor or the Human Resources Manager. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to disciplinary action up to and including termination.

All reports of illegal and dishonest activities will be promptly submitted to the Human Resources Manager who is responsible for investigating and coordinating corrective action. Employees with any questions regarding this policy should contact the Human Resources Manager.

Whistle blower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistle blower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. CRRL will not retaliate against a whistle blower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistle blower who believes they are being retaliated against must contact the Human Resources Manager immediately. The right of a whistle blower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

This Policy is in accordance with The Fraud and Abuse Whistle Blower Protection Act as set forth in Virginia Code § 2.2-3009 ~~et seq.~~ through § 2.2-3014.

Proposed with edits from VRSA sample policy:

## **WHISTLE BLOWER POLICY**

A whistle blower is defined [as](#) an employee who reports an activity that [they he/she](#) considered to be illegal or dishonest to one or more of the parties specified in this Policy. The whistle blower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged

with these responsibilities. Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact [a their immediate](#) supervisor or the Human Resources Manager. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to disciplinary action up to and including termination.

[All reports of illegal and dishonest activities will be promptly submitted to the Human Resources Manager who is responsible for investigating and coordinating corrective action. Employees with any questions regarding this policy should contact the Human Resources Manager.](#)

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immunity for any personal wrongdoing that is alleged and investigated.

This Policy is in accordance with The Fraud and Abuse Whistle Blower Protection Act as set forth in Virginia Code § 2.2-3009 ~~et seq.~~ through § 2.2-3014.

~~All reports of illegal and dishonest activities will be promptly submitted to the Human Resources Manager who is responsible for investigating and coordinating corrective action. Employees with any questions regarding this policy should contact the Human Resources Manager.~~

## VRSA Sample Policy:

A whistleblower as defined by this policy is an employee of (Name of Entity) who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or the Human Resources Director. The employee must exercise sound

judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities will be promptly submitted to the Vice President of Human Resources who is responsible for investigating and coordinating corrective action.

Employees with any questions regarding this policy should contact the Director of Human Resources.