

FreeHab Therapy Whistleblower Protection Policy

FreeHab Therapy is committed to maintaining the highest standards of integrity and ethical conduct. This Whistleblower Protection Policy aims to encourage and enable directors, officers, employees, and other stakeholders to report concerns about suspected misconduct, illegal activities, or violations of organizational policies without fear of retaliation. As employees and representatives of FreeHab Therapy, we must practice honesty and integrity in responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

Whistleblower Protection Policy is intended to encourage and enable employees and others to raise serious concerns internally so that FreeHab Therapy can address and correct inappropriate conduct and actions. This policy applies to all individuals associated with FreeHab Therapy, including but not limited to employees, volunteers, board members, contractors, and service providers. It is the responsibility of all aforementioned members to report concerns about violations of FreeHab Therapy's [Code of Ethics](#) or suspected violations of law or regulations that govern FreeHab Therapy's operations.

Policy Statement

FreeHab Therapy prohibits retaliation against any individual who, in good faith, reports suspected wrongdoing. This includes concerns related to ethics violations, financial impropriety, violations of laws or regulations, unsafe practices, harassment, discrimination, or violations of any regulation governing the operations of FreeHab Therapy. Retaliation will be treated as a serious violation of FreeHab Therapy's values and will result in disciplinary action, up to and including termination or removal.

Reporting Procedures

FreeHab Therapy has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with your supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Executive Director. Supervisors are required to report complaints or concerns about suspected ethical and legal violations in writing to the FreeHab Therapy's Executive Director, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive.

1. What to Report:

- Fraud or financial misconduct
- Violations of applicable laws or regulations
- Unsafe or abusive treatment of patients or staff
- Discrimination or harassment

- Conflicts of interest
- Violations of organizational policies or ethical standards

2. How to Report:

- In writing or verbally to the Executive Director or the Compliance Officer
- Anonymously, via a written letter or a secure digital platform (if applicable)
- Externally, to regulatory agencies, when appropriate or required by law

3. Confidentiality:

All reports will be handled with as much confidentiality as possible. The identity of the whistleblower will be kept confidential to the extent practicable and permitted by law.

Compliance Officer

FreeHab Therapy's Executive Director is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer (contact email FreeHabTherapyHR@FreeHabTherapy.org) will advise the Executive Director and/or the Board of Directors of all complaints, the resolution, and will report at least annually to the Treasurer/Chair of the Finance Committee on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

FreeHab Therapy's Executive Director, the Compliance Officer, and/or HR Personnel shall immediately notify the Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Protection Against Retaliation

FreeHab Therapy strictly prohibits retaliation in any form—including dismissal, demotion, harassment, discrimination, or any adverse employment action—against any individual who reports a concern in good faith or cooperates in an investigation.

Anyone found to have retaliated against a whistleblower will be subject to disciplinary action, up to and including termination.

Bad Faith Reports

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Reports that are knowingly false, made maliciously, or made with reckless disregard for the truth are not protected under this policy and may result in disciplinary action.

Investigation Process

- The Executive Director or designated authority will promptly investigate all credible reports.

- If the report involves the Executive Director, the investigation will be handled by the Board Chair or an appointed committee.
- Findings will be documented, and corrective action will be taken as necessary.
- The whistleblower may receive updates on the outcome if not submitted anonymously.

Responsibility and Oversight

- The Director of Operations is responsible for implementing this policy, and the Compliance Officer is responsible for ensuring it is communicated and enforced across the organization.
- The Board of Directors will monitor compliance and oversee any high-level investigations.
- This policy will be included in employee and volunteer onboarding materials and reviewed annually.

Effective Date: July 1, 2025
Review Date: July 1, 2025
Policy Owner: Elaine Thayer, Secretary
Approved By: Susan Peck, Executive Director
Revision History: Version 1.0

I have read and agree to FreeHab Therapy's Privacy Policy.

Signature: _____

Name (Printed): _____

Date: _____