

MDS WHISTLEBLOWER COMPLAINT POLICY

The MDS requires its directors, officers and employees to observe high standards of business and personal ethics, and to comply with all applicable laws and regulations, in the conduct of their duties and responsibilities. The MDS is also committed to protecting employees from unlawful retaliation for their having in good faith disclosed or reported illegal conduct.

Reporting Responsibility

Managers and supervisors are required to report any complaints or concerns about conduct that has or could result in fraudulent or illegal acts to the executive director or the Executive Committee of the Board of Trustees.

Complaint Procedure

Employees should report any complaints or concerns about conduct that has or could result in fraudulent or illegal acts to the executive director or the Executive Committee of the Board of Trustees. Employees making a complaint may request that their complaint remain anonymous.

Investigation

All reports will be taken seriously and addressed promptly. After receiving a report, the executive director is responsible for investigating and resolving complaints and allegations, and shall advise the Executive Committee of the Board of Trustees regarding the report. Discussions and documentation regarding the report shall be kept confidential to the extent possible under the circumstances, consistent with the need to conduct an adequate investigation and as permitted by law.

Retaliation Prohibited

Retaliation against any employee who in good faith files a report or voices a concern under this policy is strictly prohibited. Employees determined to have engaged in retaliatory behavior contrary to this policy may be subject to discipline, up to and including termination of employment. Any employee who believes that he or she has been subjected to any behavior that violates this policy should immediately report such behavior to HR or the executive director.