

# **Our Little Haven – Policy and Procedure Manual**

## **Complaints, Grievances and “Whistle Blowing”**

### **Investigation of Employee Complaints/Grievances**

It is Our Little Haven's policy to support and encourage its employees to report and disclose improper or illegal activities, and to fully investigate such reports and disclosures. It is also Our Little Haven's policy to address any complaints that allege acts or attempted acts of interference, reprisal, retaliation, threats, coercion or intimidation against employees who report, disclose or investigate improper or illegal activities and to protect those who come forward to report such activities.

Any employee who believes that the actions or words of a supervisor or fellow employee constitute unwelcome harassment or impede work performance has a responsibility to report or complain as soon as possible to the appropriate supervisor or to the Director of Clinical Programs or Director of Finance and Operations, if the complaint involves the supervisor. All complaints of harassment must be investigated promptly in an impartial and confidential manner by the supervisor, Director of Clinical Programs and/or Director of Finance and Operations. If an employee is not satisfied with the handling of a complaint or the action taken by the above, then the employee should bring the complaint to the attention of the Executive Director or Chairman of the Board. In all cases, the employee is to be advised of the supervisor's or Director's findings and conclusions. Any employee, supervisor or manager who is found, after appropriate investigation, to have engaged in harassment of another employee will be subject to the appropriate disciplinary action, depending on the circumstances, up to and including termination.

## **WHISTLEBLOWER POLICY**

### **Purpose**

Our Little Haven is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and Our Little Haven's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistle-blowing.

This whistle-blowing policy is intended to cover protections for you if you raise concerns regarding Our Little Haven, such as concerns regarding: incorrect financial reporting; unlawful activity; activities that are not in line with Company policy, including the Code of Business Conduct; or activities, which otherwise amount to 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 - Allegations in bad faith may result in disciplinary action.

Reporting - The whistle-blowing 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:

Lewis Rice  
attn: Rob Golterman  
600 Washington Ave Suite 2500  
St. Louis, Missouri 63101

Employment-related concerns should continue to be reported through your normal channels such as your supervisor, Executive Director, Director of Finance and Operations or to the President of the Board of Directors:

Mr. Bill Newbold  
J.P. Morgan & Co.,  
One North Brentwood,  
Clayton, Mo 63105