

THE WHISTLEBLOWER PROTECTION POLICY Of The ALABAMA SHERIFFS YOUTH RANCHES, INC.

A. Purpose:

The Purpose of the Alabama Sheriffs Youth Ranches, Inc. (hereafter, “the Ranches”) Whistleblower Protection Policy is to protect individuals who place themselves at any form of risk to report unethical or unlawful practices or behavior within the Ranches. It is expected that the Ranches’ employees, officers and Trustees will observe high ethical standards in conducting their duties and responsibilities. This Policy is intended to improve the Ranches’ governance and accountability by giving management and the Board of Trustees (hereafter, the “Trustees”) opportunities to learn of potential unethical or unlawful circumstances directly from the Ranches’ employees, Trustees, and volunteers, and to respond with any appropriate corrective action.

B. Application:

This Whistleblower Protection Policy applies to all of the Ranches’ staff, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all officers and Trustees, each of whom shall be entitled to protection.

C. Reporting Credible Information:

1. Employees, volunteers, officers and Trustees are encouraged to report information relating to illegal or unethical practices or violations of the Ranches’ policies (hereafter, a “violation”) when such person, in good faith, has reasonable cause to believe such behavior has occurred. Possible violations which should be reported include, but are not limited to, complaints of discrimination, suspected fraud, and breaches of internal policies and/or rules.
2. Information regarding any potential violation should be reported first to an employee’s direct supervisor, if applicable. Others, and employees who are not comfortable speaking with their supervisor, or are dissatisfied with the result of such an exchange of information, must report to the Ranches’ Chief Executive Officer (hereafter, “the CEO”) who shall act as the Ranches’ “Compliance Officer”, unless the report relates to the CEO, in which case the report shall be made to the Chairman of the Ranches’ Board of Trustees or the Ranches’ attorney.
3. Anyone reporting a violation must do so in good faith, and must have reasonable grounds for believing that the information shared in the report indicates that a genuine violation has occurred.

4. Employees of the Ranches making false reports of violations will be subject to discipline, up to and including dismissal from employment.

D. Investigating Information:

1. The Compliance Officer receiving a report of a potential violation shall promptly investigate that report and prepare a written report to the Board of Trustees.
2. During the investigation of an alleged violation, all persons entitled to protection shall provide the Compliance Officer with credible information.
3. The Compliance Officer must, in receiving and investigating a report and additional information, endeavor to protect the confidentiality of all persons entitled to protection.

E. Confidentiality:

1. The Ranches encourage anyone reporting a violation to identify himself or herself when making a report in order to facilitate the investigation.
2. Reports of potential violations may be submitted anonymously only by drafting a document entitled "Whistleblower Report" and mailing it to the Ranches' CEO or, as appropriate, the Chairman of the Board of Trustees or the Ranches' attorney.
3. Reports of violations or suspected violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the Ranches or law enforcement to conduct an adequate investigation.

E. Protection from Retaliation:

1. No person entitled to protection under this Policy shall be subjected to retaliation, intimidation, harassment, or other adverse action for reporting information in accordance with this Policy.
2. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation in accordance with this Policy.
3. Any individual within the Organization who retaliates against another individual who has reported a violation in good faith or who, in good faith, has cooperated in the investigation of a violation is subject to discipline, including termination of employment or volunteer status.

F. Dissemination of this Policy:

This Policy shall be disseminated in writing to all employees, officers and Trustees, and shall be available to the public for access and review on the Ranches' website.

G. Implementation of this Policy:

The Ranches will implement this Policy by:

1. Documenting all reported violations;
2. Working with legal counsel to decide whether a reported violation has merit, and if so, the proper corrective action to be taken;
3. Keeping the Trustees informed of the progress of any investigations;
4. Allowing the identity of the reporting person to, insofar as possible, remain confidential.
5. Interviewing employees, volunteer, officers and Trustees;
6. Requesting and reviewing relevant documents, and/or requesting that an auditor or counsel investigate a complaint and obtain potential evidentiary materials;
7. Preparing written records of any reported violations and their dispositions, and retaining such records in the office of the Ranches' CEO for at least seven years after the Report was first received; and
8. Reporting to any claimant, the outcome of any investigation, and any action taken by the Ranches as a result of obtaining such information.