**Whistleblower Policy**

Date Established: **February 2010**

Amended:

This whistleblowing policy is intended to cover protections for individuals who raise concerns regarding HTA, such as concerns regarding:

* Incorrect financial reporting;
* unlawful activity;
* activities that are not in line with HTA 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 volunteers or staff 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.

**Procedure: 1. Process for Raising a Concern**

*Reporting-* The whistleblowing 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 general counsel.

**Procedure: 2. How the Report of Concern Will be Handled**

The action taken by HTA in response to a report of concern under this policy will depend on the nature of the concern. The Audit Committee of the HTA Board of Directors shall receive information on each report of concern and follow-up information on actions taken.