

Des Moines Area Medical Education Consortium Corporation Policy

Prohibition of Retaliation against Whistleblowers

I. Purposes.

- A. To prevent retaliation against employees who raise concerns to any corporate source.
- B. To encourage communication and reporting by employees of incidents of potential violation of law and/or of corporate policies and procedures.
- C. To support corporate efforts towards corporate compliance and ethical corporate conduct and accountability.

II. Policy.

- A. In General. Retaliation against employees of the corporation who raise concerns regarding potential violations of the law and/or of corporate standards of conduct is prohibited. Retaliation against any employee for proper use of corporate compliance reporting mechanisms is cause for discipline, up to and including dismissal.
- B. Specific Prohibitions. No officer, employee, contractor, subcontractor, or agent of the corporation may discharge, demote, suspend, threaten, harass, or in any other manner (knowingly and intentionally) discriminate against any employee of the corporation in the terms and conditions of employment because of any lawful act done by the employee to:
 - 1. Provide information, cause information to be provided, or otherwise assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of state or federal law applicable to the corporation, or corporate policies and procedures, when the information or assistance is provided to, or the investigation is conducted by:
 - a. any state or federal regulatory or law enforcement agency;
 - b. any member of Congress or state legislature or any committee thereof; or
 - c. a person with supervisory authority over the employee or such other person working for the corporation who has the authority to investigate discover, or terminate misconduct (e.g., a corporate compliance officer); or
 - 2. File, cause to be filed, testify, participate in, or otherwise assist in a proceeding filed or about to be filed (without the knowledge of the employer) relating to an alleged violation of state or federal law applicable to the corporation.

Approved by the Board of Directors of on: (insert date)