

OPHA Whistleblower Policy



Oak Park
Homes Association™
A Better Place to Live...

Purpose

The purpose of this whistleblower policy is to provide direction to all current and former directors, employees, contractors, subcontractors, agents, volunteers, landowners, vendors, donors, and partners of Oak Park Homes Association (OPHA) regarding the communication of concerns on questionable financial, ethical, or operational matters.

Defined Terms

For the purpose of this policy the OPHA is meant to be Oak Park Homes Association (OPHA) and includes all of its locations across the country.

The Whistleblower

For the purpose of this policy the "Whistleblower" is meant to be any director, employee, contractor, subcontractor, agent, volunteer, landowner, vendor, donor, reporter, members of the general public or partner of OPHA who has reported a whistleblower incident.

Whistleblower Incident

A "whistleblower incident" is defined as a concern or possible wrongdoing related to the OPHA's financial, ethical, or operational matters. For greater clarity, whistleblower incidents are intended to include, but are not limited to, the following:

- Changing work from one project to other projects to stay on budget;
- "Side deals" or "under the table" dealings with contractors for personal benefit;
- Receiving personal kickbacks or significant gifts (over \$50) from contractors or vendors which could create bias in the tendering process;
- Inappropriate recording or reporting of revenues, or lack thereof;
- Inappropriate classification of assets and/or liabilities;
- A deliberate disregard or circumvention of Association policies;
- Embezzlement of OPHA assets by an individual or group of individuals;
- Inappropriate occurrences at a OPHA event; and
- Inappropriate projects for the benefit of a landowner or business, and not necessarily in the OPHA's interest.

Policy Statements

It is the policy of OPHA that the Whistleblower must immediately communicate *whistleblower incidents* as soon as the Whistleblower becomes aware of such situations.

Whistleblower incidents shall be communicated using OPHA's prescribed procedures for the submission of *whistleblower incidents*. It is the policy of OPHA that the Whistleblower will not be discharged, removed, or in any other manner discriminated against as a result of communicating a *whistleblower incident*. In the event the whistleblower is a reporter, s/he will not be subjected to any Retaliatory Actions if s/he files, causes to be filed, testifies in, participates in, or otherwise assists in any proceeding

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which is filed or about to be filed relating to such possible wrongdoing or concern. Any OPHA volunteer or management firm staff member found to be in violation of this policy will face disciplinary action.

Continued violation of this policy by volunteers and/or management firm staff (i.e., continued harassment of the Whistleblower) may result in removal or contract termination. OPHA will not protect a whistleblower who intentionally makes false accusations in reporting of a *whistleblower incident*. It is the policy of OPHA to treat all *reported whistleblower incidents* in a confidential and sensitive manner. In addition, the Whistleblower shall be provided the opportunity to remain anonymous.

Applicability

This policy applies to all current and former directors, employees, contractors, subcontractors, agents, volunteers, landowners, vendors, donors, and partners of OPHA.

Available Resources

Procedures to enable the communication of *whistleblower incidents* can be accessed on the OPHA website at: <http://oakparkhomes.org/>

Questions relating to the whistleblower policy should be directed to:

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