



## Code of Conduct/Work Ethics Policy

### Article I Introduction and Definitions

#### Section 1.0.1 Statement of Purpose

The Monroe Livingston Regional EMS Council is committed to ensuring that its business is conducted, in all respects and at all times, in accordance with rigorous ethical, professional and legal standards, which prevail from time to time, in the same industrial sector in which the Council conducts its normal business.

#### Section 1.0.2 Applicability

For the purposes of this Policy, all persons elected or appointed to Council seats, and any person who serves on any sub-committee or standing committee of the Regional Council (including, but not limited to, the Regional Emergency Medical Advisory Committee, Executive Committee, Nominations, Elections, and Governance Committee, Training and Education Committee, P.I.E.R. Committee, or any working group established by those or any other sub-committee of the Council), shall be bound by this Policy.

#### Section 1.0.3 Penalties

Any breach of this Policy may result in disciplinary action against the member concerned, including potential dismissal of the member from the Council or any subcommittee thereof. The failure to agree to adhere to such policy and comply with its mandates shall require dismissal from one's position.

#### Section 1.1.1 Definitions

- A. **MLREMS** and **Council** shall refer to the Monroe-Livingston Regional EMS Council and its sub-committees, unless otherwise identified.
- B. **Member** refers to all persons elected or appointed to Council or any of its subcommittees, technical advisory groups, working groups, and standing committees, and all persons who may serve within any such subdivisions.
- C. **Chair** refers to the chairperson of the Council.
- D. **NEG** refers to the standing committee on Nominations, Elections, and Governance.
- E. **Executive Committee** or **Council Exec** refers to the standing committee of officers and committee chairs consisting of the Council Chair, Vice Chair, Secretary, Treasurer, and other officials as outlined in the Council By-Laws.



## **Article II Code of Conduct**

### **Section 2.0.1 Intent**

This Code of Conduct has been formulated in order to foster and maintain the Council's trust and confidence in the professionalism and the integrity of the members of the Council. This will be accomplished by ensuring that all members of the Council are aware of the ethical standards required of them, adhere to the standards of conduct as set forth in this Policy, and conduct themselves accordingly while holding such position.

This Policy instructs members of the Council on the appropriate conduct and business practices required of individuals holding these positions. The circumstances of conduct as set forth in this Policy, although not exhaustive, are intended to cover those situations which are most likely perceived to be encountered by Council members. If by chance any Council member encounters any circumstances which are not covered hereunder or in cases of doubt, Council members are encouraged to seek guidance from the Council Chair or other Council Officer.

### **Section 2.0.2 General Conduct**

The Council is committed to creating a collaborative environment, regardless of location, that is free from harassment and discrimination, where Council members are respected and encouraged toward good performance and conduct.

To achieve this goal all members are instructed to:

- A. Adhere to this Policy in their professional as well as personal conduct with respect to any and all Council business or any matters that could reasonably be construed as pertaining to Council business;
- B. Treat Council members and members of various Council committees with respect, courtesy, honesty, and fairness;
- C. Respect different values, beliefs, cultures, and religions;
- D. Value the contributions of the people with whom they work;
- E. Work co-operatively, and not bully, intimidate, harass or discriminate against other members of the Council or those closely associated with the Council.

### **Section 2.0.3 Ethical Conduct**

MLREMS and its Council members must, at all times, comply with all applicable laws and regulations governing these organizations and boards as well as this and any related Policy. Council members shall not engage in unethical business dealings as it relates in any way to their service with this Council. This prohibited conduct includes making, offering or receiving any direct or indirect payments in order to assist in obtaining or receiving a desired outcome from this Council, engaging in any illegal acts, intimidating any person in order to receive an outcome, representing clients before the Council, and in any way conducting themselves in an unethical manner in order to gain a benefit for themselves or others.

Council members must at all times conduct themselves in accordance with this Policy. Council members uncertain about the application or interpretation of any requirements should refer the matter to the Council Chair, who, if necessary, may opt to seek appropriate legal advice.



#### Section 2.0.4 Expectations

Members shall conduct themselves in a professional and ethical manner. The following actions are considered not to be professional or ethical conduct and are prohibited while participating in Council events, representing oneself as a Council member or engaging in business on behalf of the Council:

- A. Becoming intoxicated by alcohol or impaired by legal or illegal drugs;
- B. Engaging in violence, civil disorder or similar conduct.
- C. Sexually harassing any guest, member, attendee or participant;
- D. Harassing, bullying, intimidating, threatening use of physical force, using inappropriate language, coercing another in order to achieve a desired result.

### **Article III Harassment**

#### Section 3.0.1 Harassment Defined

- A. The most productive and satisfying work environment is one in which work is accomplished in a spirit of mutual trust and respect. Harassment is a form of discrimination that is offensive, impairs morale, undermines the integrity of Council relationships and causes serious harm to the productivity, efficiency and stability of the organization.
- B. In general, harassment means persistent and unwelcome conduct or actions on any of the bases highlighted below, and includes behavior that is not welcome and is personally offensive. Sexual harassment is one type of harassment and includes unwelcome sexual advances, unwelcome physical contact of a sexual nature or unwelcome verbal or physical conduct of a sexual nature. Bullying, intimidation, threats, coercion and use of force are other examples of prohibited harassment.

#### Section 3.0.2 Prohibited Conduct

All Council members have a right to work in an environment free from discrimination and harassing conduct, including but not limited to sexual harassment. Harassment on the basis of a member's race, color, creed, ancestry, national origin, age, disability, sex, arrest or conviction record, marital status, or sexual orientation is strictly prohibited. Harassment on any of these bases is also unlawful under New York State and federal laws.

#### Section 3.0.3 Specific Examples

Unwelcome verbal or physical conduct of a sexual nature includes, but is not limited to:

- A. The repeated making of unsolicited, inappropriate gestures or comments;
- B. The display of offensive sexually graphic materials not necessary for our work;

Harassment on any basis (race, sex, age, disability, etc.) exists whenever:

- A. Submission to harassing conduct is made, either explicitly or implicitly, a term or condition of an individual's membership.



- B. Submission to or rejection of such conduct is used as the basis for an appointment decision affecting an individual.
- C. The conduct interferes with a member's work or creates an intimidating, hostile or offensive work environment.

Harassment includes any conduct towards another, whether verbal or otherwise, which is intended to or should be reasonably expected to cause another:

- A. Fear of physical harm;
- B. Actual physical harm;
- C. Fear of significant emotional harm;
- D. Actual and significant emotional harm;
- E. Undue and unjust embarrassment on more than one occasion with the intent to emotionally harm the recipient;
- F. Extreme and outrageous embarrassment of an individual on one occasion with the intent to emotionally harm the recipient;
- G. Extreme and outrageous demoralization of another.

#### Section 3.0.4 Grievance Procedure

- A. Any Council member who believes he or she is being harassed, or any Council member who becomes aware of harassment, should promptly notify the Council Chair. If the Council member believes the Council Chair is the harasser, the Council's Vice Chair should be notified.
- B. Upon notification of a harassment complaint, a confidential and impartial investigation will be promptly conducted. The Council Chair may lead this investigation and appoint a "special committee" to investigate the harassment allegations. Once the investigation is complete, the parties of the complaint will be notified of the findings and their options.

#### Section 3.0.5 Non-Retaliation

This policy also expressly prohibits retaliation of any kind against any Council member bringing a complaint or assisting in the investigation of a harassment complaint. Such retaliation is also unlawful under New York State Law.

#### Section 3.06 Anti-Bullying

##### DEFINITION

"Bullying" is unwanted, aggressive behavior among individuals that involves a real or perceived power imbalance. The behavior is repeated, or has the potential to be repeated, over time. Bullying includes actions such as making threats, spreading rumors, attacking someone physically or verbally, and excluding someone from a group on purpose with the only intent to be to harm them emotionally.



“Bullying” or “harassment” is any gesture or written, verbal, graphic, or physical act that is reasonably perceived as being dehumanizing, intimidating, hostile, humiliating, threatening, or otherwise likely to evoke fear of physical harm or emotional distress and may be motivated either by bias or prejudice based upon any actual or perceived characteristic, such as race, color, religion, ancestry, national origin, gender, sexual orientation, gender identity or expression; or a mental, physical, or sensory disability or impairment; or by any other distinguishing characteristic, or is based upon association with another person who has or is perceived to have any distinguishing characteristic. Bullying and harassment also include forms of retaliation against individuals who report or cooperate in an investigation under this policy.

Cyberbullying is bullying that takes place using electronic technology. Examples of cyberbullying include mean text messages or emails, rumors sent by email or posted on social networking sites, and embarrassing pictures, videos, websites, or fake profiles.

#### POLICY

The Council hereby prohibits bullying of any type, as defined above, or as otherwise may be reasonably defined. Bullying shall not be permitted between any members of the Council. Cyberbullying is similarly prohibited.

Any member found to be engaging in bullying shall be subject to dismissal from the Council or subcommittee on which he or she serves.

Additionally, persons who stand-by and watch bullying, without attempting to cease the conduct, may also be subject to dismissal, as the “ganging up” perception is part of bullying. Participating in or watching bullying is also prohibited.

#### REPORTING

Any person aware of bullying, whether to themselves or to others, shall immediately report the conduct or perceived conduct to the Chair and if the Chair is involved, to the Vice Chair. No person may be retaliated against for reporting bullying. Reports may be made confidentially if desired, but these reports are not preferred as they prohibit thorough investigations.



## Article IV Conflicts of Interest

### Section 4.0.1 Intent

MLREMS instructs members to perform their duties conscientiously, honestly, and in accordance with the best interests of the Council. Council members shall not use their positions or the knowledge gained as a result of their position for private or personal gain/advantage.

### Section 4.0.2 Expected Actions

- A. If a Council member knows or should know that they may have a conflict of interest in given subject, the individual must immediately communicate those facts to the Council Chair, and take those actions appropriate to ensure the integrity of that course of action, such as recusal from discussion or abstention from votes relative to that topic, if appropriate and requested by the Council body. Recusal requires that the conflicted individual may not vote on the matter and may not be present during any discussion on the matter.
- B. Council members shall disclose to, or ask for deliberation by, the Council any conflict of interest or concern that one exists, prior to engaging in discussion or vote on any issue before the Council where such potential or actual conflict may be pertinent. The Council will make a recommendation, and determine by voice vote after appropriate discussion, if there is a question regarding the member's conflict, and what action that member should take – including whether to abstain from discussion and/or abstain from voting on the matter.

### Section 4.0.3 Grounds for Conflict Determination

The following situations represent conflicts of interest for which recusal is mandatory. Failure to disclose the following could be considered a breach of responsibility and result in action by the Council, however the listed items should not, in and of themselves, be considered conflicts of interest *a priori*.

*If the Member,*

- A. Has, is expected to have or was promised or offered a financial interest in any sale of services/goods when such financial interest was received or offered with prior knowledge that the Council intended to purchase those services/goods.
- B. Solicits, accepts or seeks a gift, gratuity, or favor from any person, firm, or corporation involved in a contract or transaction which is or may be subject of official action by the Council.
- C. Is offered and accepts courtesies or promises of the same, such as gifts, gratuity or favors given or received which have monetary value and is offered, accepted or contingent in expectation of preferential treatment in matters brought before the Council.
  1. Examples of acceptable courtesies include: a meal at a social event, exchange of floral offerings or gifts of food as a result of illness, death, birth, holidays and promotions. A nominal value of not more than \$50.00 is suggested for such courtesies.
  2. Members should report to a Council Officer any circumstances where an offer of courtesy or gift has been made in circumstances that suggest attempt to gain influence or preferential treatment.



- D. Participates in the decision making process which in turn leads to the issuing of a purchase order or contract where the Council member or a family member has a private interest/personal gain, whether direct or indirect.
- E. Engages in, accepts employment/directorships from, or renders services for private interests for any compensation or consideration having monetary value when such employment or services are incompatible with the proper discharge of the Council member's duties or would impair their independence of judgment or action in the performance of their official duties, or give the appearance of the above.
- F. Directly or indirectly, gives or receives or agrees to receive compensation, gift, reward, commission, or gratuity from any source except the Council for any matter directly connected with or related to the Council member's duties on the Council.

#### Section 4.0.4 Additional Guidelines

- A. Council members who have financial interest (including their family members) in an organization that conducts business with or solicits services from the Council, MUST fully disclose any and all interests to the Council.
- B. Council members and their families are not permitted to accept or solicit gifts, services, special accommodation or other favors from any current or potential customers/vendors with whom the Council does business, if it might be inferred that such action could affect the Council member's decision. The policy does not include normal ethical business practices such as luncheons, token gifts and advertising items such as pens, pencils, calendars, or other gifts of nominal value.
- C. No Council member shall, directly or indirectly give, offer, or promise anything of value to any representative doing business with the Council.
- D. Because it is nearly impossible to describe every situation which could arise involving potential conflicts of interest, members of the Council are asked to carefully evaluate any activity which could be construed as a conflict of interest which affects the business of the Council.



## **Article V      Fraud**

### **Section 5.0.1    Expectation and Definitions**

Members of the Council shall abstain from supporting or engaging in any act of fraud, deceit, dishonestly, unfair business dealings, financial abuse, and to make sure that all such acts are reported upon forming a good faith belief of the presence or planning of the same.

The following acts are considered fraudulent activities:

- A. Forgery or alteration of any document or account belonging to the Council.
- B. Forgery or alteration of check, bank draft or any other financial instrument
- C. Misappropriation of funds, securities, supplies or others assets by fraudulent means etc.
- D. Falsifying records such as pay-rolls, removing the documents from files and /or replacing it by a fraudulent note etc.
- E. Willful suppression of facts/deception in matters of appointment, placements, submission of reports, tender committee recommendations etc. as a result of which a wrongful gain(s) is made to one and wrongful loss(s) is caused to the others.
- F. Utilizing Council funds for personal purposes.
- G. Authorizing or receiving payments for goods not supplied or services not rendered.
- H. Destruction, disposition, removal of records or any other assets of the Council with an ulterior motive to manipulate and misrepresent the facts so as to create suspicion, suppression, or cheating as a result of which objective assessment/decision would not be arrived at.
- I. Any other act that falls under the gamut of fraudulent activity.

### **Section 5.0.2    Reporting Fraud**

- A. Any Council officer, Council member, vendor, supplier, contractor, consultant, service provider or any other agency doing any type of business with the Council must report any fraud or suspected fraud as soon as they become aware of such activity.
- B. Such reporting shall be made to the Council Chair or the Chair of the Nominations, Elections, and Governance (NEG) Committee.
- C. All reports of fraud or suspected fraud shall be handled with utmost speed and shall be coordinated by the Council Chair and NEG Chair.
- D. In the event the alleged fraud involves the Council Chair, the Vice Chair will be notified and serve in the Chair's stead.

### **Section 5.0.3    Investigating Reports of Fraud**

- A. The Council Chair shall refer the details of the fraud/suspected fraud to the Council Executive Committee for further appropriate investigation and needful action.



- B. The Council Chair may opt to appoint a “special committee” to investigate the reported fraud/suspected fraud.
  - 1. After completion of the investigation, appropriate action shall be taken by the members of the Council Executive Committee. That action may include administrative reforms, disciplinary action including potential dismissal of the member from the Council or any subcommittee thereof, civil or criminal action, or closure of the matter if it is proven that fraud has not been committed. No action to discipline a member of Council or any of its subcommittees shall take place without majority vote of the Council.
  - 2. The NEG Chair or “special committee” shall keep the MLREMS Council Chair apprised of the ongoing investigation. The same shall be done once the investigation has been completed.
- C. After an initial review by the Council Chair and Executive Committee, all instances of suspected fraud will be referred to the New York State Attorney General’s Office, Charities Bureau and Public Integrity Bureau, or another acceptable law enforcement agency for consideration and investigation.



## Article VI Social Media Policy

### Section 6.0.1 Intent

- A. The purpose of this policy is to establish standards and responsibilities for the acceptable use of social media by members of the Council. The policy governs the use, administration, management, monitoring, and retention of social/digital media and social/digital media content, consistent with state, and federal laws and related regulations.
- B. This policy applies to all uses of social/digital media by MLREMS Council officers, Council members and those assigned or employed by the Program Agency consistent with their duties applicable to the Council.

### Section 6.0.2 Definitions

- A. Social Media:** Includes Internet and cellular telephone technologies that facilitate and promote interactive communication, participation, and collaboration, including transmission of words, pictures, or gestures. Examples of social media include, but are not limited to, web sites and applications such as Blogger, Facebook, LinkedIn, Twitter, Tumblr, Foursquare, Meetup.com, Flickr, YouTube, Yelp, Second Life, and Wikipedia, and all the interactive tools and functions they provide to users, and also includes texting, group texting, or other means of electronic distribution of social broadcast (SnapChat, InstaGram, etc.).
- B. Authorized User:** The MLREMS Program Agency Administrator and a backup administrator appointed by the Administrator shall be the individuals assigned to administer, manage and monitor the activity and retention of the MLREMS Web Site or other established social media network(s).
- C. Social Media Content:** Includes any materials, documents, photographs, graphics, and other information that is created, posted, distributed, or transmitted using social media internet sites or social media tools.

### Section 6.0.3 Accountability

- A. Only authorized representatives of the Council are permitted to speak on behalf of the Council.
- B. Council members, Council committee members, and contractors are required to report all unauthorized uses of Council social media. Unauthorized uses shall be directed to the Program Agency Administrator's attention as soon as possible.
- C. No Council member, Council committee member, contractor or Program Agency employee may establish any social media account in the name of or on behalf of MLREMS or the Program Agency unless the Council Executive Committee and Program Agency Administrator has given the authority to do so. Any such action must receive the approval of the Council prior to implementation.

### Section 6.0.4 Unacceptable Uses

The activities and uses of social media or email addresses or computer systems belonging to the council in a method listed below are prohibited. Council members are prohibited from engaging in any of the following conduct, when it can reasonably be construed that such use or conduct is in the course of Council business or reflects the member's activities on behalf of the Council:

- A. Using social media in a manner that does not comply with federal, state, and local laws and regulations.



- B. Using social/digital media belonging to or in the name of the council, in a manner that:
1. Violates the copyright, trademark, or other intellectual property rights of any person or entity, or otherwise violates their legal ownership interests;
  2. Includes ethnic slurs, profanity, personal insults; material that is harassing, defamatory, fraudulent or discriminatory; or other content or communications that would not be acceptable in the workplace;
  3. Violates the terms of contracts governing the use of any social media content, including but not limited to, software and other intellectual property licenses;
  4. Displays sexually explicit images, cartoons, jokes, messages, or other material in violation of the Harassment policy;
  5. Displays images (pictures or video) that have not been approved by the Council, Council Exec, or the Program Agency Administrator on Council web sites or accounts, or while purporting to represent Council business.
  6. Contains confidential or "For Official Use Only" information or information that compromises the security of the Program Agency's network or information systems. Such "For Official Use Only" (FOUO) or confidential information includes, but is not limited to, information that is protected under the Health Insurance Portability and Accountability Act of 1996 (HIPAA) or other federal, state, or local laws and regulations (except as permitted under such laws and regulations), as well as social security numbers and other personally identifiable information.



## **Article VII      Records Retention Policy**

### **Section 7.0.1    Intent**

- A. Council and subcommittee members shall, from time to time as part of their duties and responsibilities to the Council, have access to and generate records related to Council business, in paper or electronic form, including but not limited to electronic mail, portable digital format documents (PDF), text documents, spreadsheets, presentations, database files, and the like. Similarly, such members may have access to privileged information and information systems, such as the Council web site, calendar or electronic mail services, patient care information in the course of approved Quality Assurance/Patient Safety review, and state Health Department actions.
- B. This policy aims to establish expectations for handling of electronic and paper records by members of Council.

### **Section 7.0.2    Policy**

Records, either paper or electronic, developed by Council members or subcommittee members related to Council business and distributed on behalf of the Council, or stored on electronic media/information systems/information technology maintained by or for the Council, including but not limited to Google Drive, Google Gmail, and MLREMS.org web site, shall be maintained in accordance with this records retention policy, and New York state law or federal law where applicable. Such records as pertain to the conduct of business of the Council (business records) will be considered property of the Council.

Members are cautioned that as the Council is a quasi-public entity, even personal electronic mail accounts containing Council business may be subject to Freedom Of Information Law requests.

### **Section 7.0.3    Conduct upon Separation from Council**

- A. Upon separation from the Council for any reason, such member shall surrender to the current Chair or Vice Chair of the Council any such business records, including document files, spreadsheets, portable digital documents, etc., and where deemed appropriate by the Council executive committee, copies of any electronic mail or correspondence that impacts Council business.
- B. Members are prohibited from sharing or redistributing any such business records following separation from the Council without express permission of the Council Chair or Vice Chair, and in keeping with all tenets of Article 30 of the Public Health Law with regard to patient or provider sensitive information.



<b>Record Type(s)</b>	<b>Manner of Record Keeping</b>	<b>Retention Period</b>
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Organizational Records:

- |   |   |           |
|---|---|-----------|
| ■ By-Laws and related documents.  | Store in Council record file at Program Agency and electronic retention*. | Permanent |
| ■ Meeting documents, including agendas, Minutes, and related Documents. | Store in Council record file at Program Agency and electronic retention.  | Permanent |

Financial Records:

- |   |  |             |
|---|--|-------------|
| ■ Year-end Treasurer's report/statement.  | Store in Council record file at Program Agency and electronic retention. | Permanent   |
| ■ Periodic Treasurer's reports.   | Store in Treasurer's files, at Program Agency, and electronic retention. | Three Years |
| ■ Bank statements, cancelled checks (when retained on paper), investment statements, related documents. | Store in Treasurer's files and electronic retention.                     | Seven Years |

Training and Education Records:

- |   |  |             |
|---|--|-------------|
| ■ Continuing education records including announcements, attendance instructor qualifications, and outlines. | Store in Council record file at Program Agency and electronic retention. | Five Years  |
| ■ NYS Specialty Course Sponsor records.   | Store in Council record file at Program Agency and electronic retention. | Seven Years |

*\*For the purposes of this policy, "electronic retention" refers to files maintained electronically in whatever form, e.g.: portable digital document, document, spreadsheet, etc., either by members of Council or the Program Agency, for the conduct of Council business, including web-based information (Council web site) or web-based "Cloud" storage media.*



## **Article VIII Non-Retaliation “Whistleblower” Policy**

### **Section 8.0.1 Intent**

The Monroe – Livingston Regional EMS Council Code of Conduct/Work Ethics Policy (“Code”) requires members and officers to observe high standards of public and personal ethics in the conduct of their duties and responsibilities. As members and representatives of the Council, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Section 8.0.2 Reporting Responsibility**

It is the responsibility of all Council members, officers, and committee and subcommittee members to comply with the Code and to report violations or suspected violations in accordance with this Policy.

### **Section 8.0.3 No Retaliation**

No Council member, officer or committee or subcommittee member who in good faith reports a violation of the Code shall suffer harassment, retaliation or other adverse consequence. A member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of membership. This Whistleblower Policy is intended to encourage and enable members and others to raise serious concerns within the Council prior to seeking outside resolution.

### **Section 8.0.4 Reporting Violations**

Violations of the Code shall be reported to the Chair of the Council, or in the absence of the Chair, the Vice Chair. In the event that the reporting member is not comfortable reporting the violation through normal channels to the Chair or Vice-chair, a report can also be made directly to the Council Compliance Officer.

### **Section 8.0.5 Compliance Officer**

- A. The Council’s Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his or her discretion, should advise the Chair and/or the Executive Committee.
- B. The Compliance Officer is required to report to the Executive Committee at least annually on compliance activity.
- C. The Council’s Compliance Officer is the Chair of the Nominations, Elections and Governance Committee.

### **Section 8.0.6 Accounting and Auditing Matters**

The Finance Committee of the Council shall address all reported concerns or complaints regarding accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Finance Committee of any such complaint and work with the committee until the matter is resolved.

### **Section 8.0.7 Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Code must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any



person making allegations that both prove not to be substantiated and to have been made maliciously or known to be false will be subject to disciplinary action.

#### Section 8.0.8 Confidentiality

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and allowing the accused to face the accuser.

#### Section 8.0.9 Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the suspected violation within five business days. All reports will be investigated and appropriate corrective action will be taken if warranted by the investigation. The Compliance Officer will give a report, as appropriate, at each Executive Committee meeting regarding all open whistleblower allegations. Timelines for investigations will vary based on complexity but will be completed whenever practical within thirty (30) business days of the report of a suspected violation.