



SUBJECT:	Whistleblower
POLICY NO:	VIII:18
APPLICABLE TO:	All Employees
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EFFECTIVE DATE:	September 15, 1993
REVISION DATE:	August 1, 2018 (due to name change)

I. POLICY:

The Hennepin Healthcare Research Institute (HHRI) is committed to complying with all applicable federal, state, and local laws and regulations, and strictly prohibits any fraudulent activity. For purposes of this policy, fraudulent activity refers to corporate financial or operational misconduct such as misuse of corporate funds, fraudulent accounting practices, violation of internal controls, or non-compliance with applicable federal, state, and local laws and regulations. For employment related concerns, see HHRI Human Resources Policy IX:10 Grievance Procedure. For concerns regarding scientific misconduct, see HHRI Administrative Policies and Procedures for Dealing with Misconduct in Science.

All employees are expected to report in good faith any concerns about possible violations of this policy without fear of retaliation of any kind. Any employee who feels that they have been retaliated against for making a good faith report should notify Human Resources.

All reports will be dealt with in a confidential manner. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation.

The HHRI will take appropriate disciplinary action, including discharge against an employee found to be in violation of this policy.

Knowledge of fraudulent activity without reporting it may be grounds for disciplinary action, including discharge, even if the party was not involved in the fraudulent activity.

II. REPORTING:

- A. Any allegation of fraudulent activity should be reported to the HHRI President, the HHRI Vice President-Operations/COO or the HHRI Secretary/Treasurer.
- B. Although the HHRI encourages its employees to report allegations directly and openly, it is possible to file a report anonymously. It should be noted, however, that anonymity could hinder or complicate investigations and possibly prevent appropriate action from being taken.

III. RELATED POLICIES:

- A. HHRI HR Policy IX:10 Grievance Procedure
- B. HHRI Administrative Policies and Procedures for Dealing with Misconduct in Science