The CRUDEM Foundation
Whistleblower Protection Policy

BACKGROUND

The CRUDEM Foundation (“CRUDEM” or “Foundation”) requires its Directors, Officers, Staff Members and Volunteers to conduct their work for the Foundation with integrity and decency, subject to healthy accountability. Such accountability means that any Director, Officer, Staff Member or Volunteer who becomes aware of fraud, corruption, child abuse or other unethical behavior at the Foundation or Hôpital Sacré Cœur (“HSC” or “Hospital”) report such misconduct to the Executive Committee of the Foundation’s Board of Directors or the Foundation’s Legal Adviser.

APPLICABILITY

This policy is applicable to all CRUDEM Directors, Officers, Staff Members and Volunteers.

DUTY TO REPORT

It is the non-delegable duty and obligation of every CRUDEM Director, Officer, Staff Member and Volunteer to report good faith suspicions or actual knowledge of fraud, corruption, child abuse or other unethical behavior at the Foundation or the Hospital. If reporting such concerns to the Hospital’s Chief Executive Officer, the responsible team leader, the Foundation’s Office in Ludlow, MA or a member of the Foundation’s Board of Directors does not resolve the matter, it is incumbent on the individual Director, Officer, Staff Member or Volunteer (i.e., the Whistleblower) to make a report to the Executive Committee or the Foundation’s Legal Adviser.

RETALIATION PROHIBITED

The Foundation has zero tolerance for retaliation against anyone who, in good faith, reports actual or suspected misconduct. Accordingly, it is the Foundation’s policy to protect these individuals—Whistleblowers—from retaliation. This includes protection from retaliation in the form of adverse employment actions such as terminations, demotions, adverse compensation decisions, inappropriate work assignments, or threats of physical harm. Any attempt to deter a Director, Officer, Staff Member or Volunteer from reporting misconduct or any attempt to intimidate such person with the objective of preventing a report is a serious offense and will result in disciplinary action.

A Whistleblower who believes s/he is the victim of retaliation or intimidation should immediately contact a member of the Executive Committee or the Foundation’s Legal Adviser.
The right to protection against retaliation related to a report of misconduct does not include immunity from investigations of personal wrongdoing or legitimate measures taken to address any unrelated performance issues.

REPORTING PROCEDURE

Directors, Officers, Staff Members and Volunteers who have a good faith suspicion or actual knowledge of misconduct should report such allegation as appropriate to the Chief Executive Officer of the Hospital, a member of the Board of Directors, the CRUDEM Office in Ludlow or to the responsible volunteer team leader. If this approach does not resolve the matter to the Whistleblower’s satisfaction, it is incumbent on her/him to elevate the report to a member of the Executive Committee or the Foundation’s Legal Adviser. Such reports may be lodged by email or telephone. A list of email addresses and telephone numbers for each member of the Executive Committee as well as the Foundation’s Legal Adviser is attached to this policy.

A copy of this policy along with reporting contact information shall be posted at the CRUDEM compound in Milot and such other places deemed appropriate by the Executive Committee or the Foundation’s Legal Adviser.

EXECUTIVE COMMITTEE

Since misconduct of any kind is a serious matter and inconsistent with CRUDEM’s core values, all allegations of misconduct will be investigated. Where such allegations are substantiated, the Executive Committee will take appropriate and thorough corrective action. Responsibility for developing and coordinating a response to an allegation of misconduct will rest with the Executive Committee, but may involve others associated with the Foundation, including the Foundation’s Legal Adviser.

DUTY TO ACT IN GOOD FAITH

While actual knowledge or proof of misconduct is not required by this policy, allegations of misconduct reported by a CRUDEM Director, Officer, Staff Member or Volunteer must be made in Good Faith and based on articulable grounds. Accordingly, a Whistleblower is obligated to provide a full statement of the facts of which s/he is aware and of any assumptions or circumstances s/he believes are relevant to the allegation. Once a Whistleblower has made a report of misconduct, s/he is obligated to inform the Executive Committee or the Foundation’s Legal Adviser of any developments or changes in circumstance relevant to the investigation. A Whistleblower who makes a knowingly false, reckless or otherwise bad faith allegation of misconduct may be subject to discipline, including termination. Discipline for a knowingly false, reckless or otherwise bad faith allegation is not prohibited retaliation.

ANONYMOUS ALLEGATIONS AND CONFIDENTIALITY
Since appropriate follow-up questions and investigation may not be possible unless the source of the information is identified in the report, Whistleblowers are strongly encouraged to make their report with attribution. Allegations reported anonymously may not be considered in the same manner—with the same gravity—as those made with attribution due to the inherent difficulty of substantiating facts where anonymous sources are concerned as well the potential for abuse. But consideration of anonymous allegations will be evaluated according to the following criteria:

- The seriousness of the subject matter of the allegation;
- The credibility of the grounds and circumstances articulated in the allegation; and
- The likelihood of confirming the allegation from attributable (i.e., non-anonymous) sources.

All allegations of misconduct reported through the Executive Committee or the Foundation’s Legal Adviser will be treated as confidential to the maximum extent consistent with a thorough investigation and as permitted by applicable law. Every effort will be made to protect the Whistleblower’s identity.
The CRUDEM Foundation
Reporting Contact Information

Hôpital Sacré Coeur Chief Executive Officer

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