



Purpose:

The Tucson Hospitals Medical Education Program (THMEP) requires directors, officers and employees (including all residents in its GME programs) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the THMEP, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility:

- It is the responsibility of all directors, officers and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation:

- No director, officer or employee who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment consequence.
- An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.
- This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within THMEP prior to seeking resolution outside THMEP.

Reporting Violations:

- THMEP has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern.
- If an employee is not comfortable speaking with a supervisor or is not satisfied with a supervisor's response, the employee is encouraged to speak with the THMEP Executive Director or anyone in administration whom that individual is comfortable in approaching.
- Supervisors and managers are required to report suspected ethics violations to the THMEP Executive Director and/or TMC Health's Compliance Officer, who have responsibility to investigate all reported violations and to address all substantiated or reasonably suspected allegations appropriately.
- For suspected fraud, or if and when an employee is dissatisfied or uncomfortable with following THMEP's open door policy, individuals should contact the TMC Healthcare Compliance Officer directly.

Investigation and Reporting:

- The THMEP Executive Director and/or TMC Healthcare's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the Executive Director and/or the Board of Directors.

Accounting and Auditing Matters:

- The Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Executive Director shall immediately notify the Board of any such complaint and work with the Board until the matter is resolved.

Acting in Good Faith:

- Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.



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THMEP Policy on Whistleblowing

- Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality:

- Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously.
- Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations:

- The Executive Director will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days.
- All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.