

DBSA Whistleblower Protection Policy 12/08

Intent: To protect the DBSA from violation of federal, state, or local law and to be in compliance through protecting its employees from reporting illegal and unethical activities.

Any employee who becomes aware of any violation of federal, state, or local law or regulation, including any financial wrongdoing, should immediately report the violation to the President/CEO to allow the organization to investigate and, if applicable, correct the situation or condition.

If the President/CEO is involved, or is believed to be involved, in the matter being reported, employees may, in the alternative, make a report to the DBSA's legal counsel and the DBSA Board of Directors. DBSA's employees, in conjunction with the Board, will conduct an investigation and take appropriate action within a reasonable period of time. Such complaints will be held in confidence to the extent the needs of the investigation permit.

"Financial wrongdoing" may include but is not limited to:

- questionable accounting practices;
- fraud or deliberate error in financial statements or recordkeeping;
- deficiencies of internal accounting controls;
- misrepresentations to company officers or the accounting department (including deviation from full reporting of financial conditions).

If any employee reports in good faith what the employee believes to be a violation of the law and/or financial wrongdoing to DBSA's Board of Directors, DBSA's legal counsel, or to a federal, state, or local agency, or assists in an investigation concerning financial wrongdoing, it is DBSA's policy that there will be no retaliation taken against that employee.

Employees are reminded of the importance of keeping financial matters confidential. Employees with questions concerning the confidentiality or appropriateness of disclosure of particular information should contact the President/CEO, DBSA's legal counsel, or DBSA's Board of Directors.