

HUMAN RESOURCES DEPARTMENT POLICY AND PROCEDURE  
GOOD DAYS

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SUBJECT: Whistleblower Policy

EFFECTIVE DATE: 01/20/2020  
(Supersedes Policy 2.290 effective 02/20/2017)

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1) Purpose

Good Days requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. This policy is meant to encourage and enable employees and others to raise serious concerns internally so that Good Days may address and correct any inappropriate conduct or actions.

2) Policy

- a) All employees and representative of Good Days must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.
- b) It is the responsibility of all board members, officers, and employees to report concerns about any violation of Good Days' policies or other suspected violation of law or regulation that governs Good Days' operations.

3) Definitions

- a) *DTSA*: The United States Defend Trade Secrets Act of 2016.
- b) *Improper Activity*: Any illegal or dishonest activity, including but not limited to, activities which violate federal, state, or local laws; improper interactions with donors or patients; or fraudulent financial reporting.
- c) *Whistleblower*: An employee of Good Days who reports an Improper Activity to one or more of the parties specified in this Policy.

4) Procedures

- a) *Duty to Report*: If an employee has knowledge of, or a concern of, Improper Activity, the employee is to contact his/her immediate supervisor or Good Days' Compliance Officer.
  - i) The employee must exercise sound judgment to avoid baseless allegations.
  - ii) An employee who intentionally files a false report of Improper Activity will be subject to discipline up to and including termination.
- b) *Open-Door Policy*: Good Days has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or are not satisfied with your supervisor's response, you are encouraged to speak with the Compliance Officer, Chief Operating Officer, or Chief Executive Officer. Employees with concerns or complaints may also submit their concerns or complaints in writing directly to their supervisor, the CEO, or the Compliance Officer. If you are not comfortable speaking with any of the above-listed persons, you may submit your concern in writing to the compliance email box: [compliance@mygooddays.org](mailto:compliance@mygooddays.org). This email box is monitored by the Compliance Officer, but you may indicate in your report that you desire to remain anonymous and that the Compliance Officer not further disclose your identity in working to resolve the matter.
- c) *Management to Investigate*: The Whistleblower is not responsible for investigating the Improper Activity or for determining fault or corrective measures; appropriate management representatives

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are charged with these responsibilities. Supervisors and managers are required to report complaints or concerns about Improper Activity in writing to Good Days' Compliance Officer who has the responsibility to investigate all reported complaints and coordinating corrective action.

- d) *Compliance Officer's Role:* Good Days' Compliance Officer is responsible for ensuring that all complaints about Improper Activity are investigated and resolved. The Compliance Officer will advise the CEO and, if applicable, the Board of Directors of all complaints and their resolution and will report, at least quarterly, or more frequently if required by law or rules imposed on Good Days by a legal authority, to the CEO and/or the Board of Directors on compliance activities relating to reports of Improper Activity, especially as such may relate to alleged accounting or financial improprieties. The Good Days Compliance Officer shall immediately notify the CEO of any concern or complaint regarding corporate accounting practices, internal controls, or auditing, and shall work with them until the matter is resolved.
- e) *Protections for Whistleblowers:* Whistleblower protections are extended in relation to:
- i) *Confidentiality.* Insofar as possible, the confidentiality of the Whistleblower will be maintained. However, identity of the Whistleblower may have to be disclosed to conduct a thorough investigation, to comply with law, and/or to provide accused individuals their legal rights of defense.
  - ii) *No Retaliation.* Good Days will not retaliate against a Whistleblower. This includes protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, poor work assignments, or threats of physical harm. Any Whistleblower who believes s/he is being retaliated against must contact the Human Resources Director immediately. The right of a Whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.
- f) *Compliance with DTSA:* Good Days will comply with the DTSA which provides as follows:
- i) Immunity from Liability for Confidential Disclosure of a Trade Secret to the Government or in a Court Filing:
    - (1) Immunity—An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that—
      - (a) is made—
        - (i) in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney; and
        - (ii) solely for the purpose of reporting or investigating a suspected violation of law; or
      - (b) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.
    - (2) Use of Trade Secret Information in Anti-Retaliation Lawsuit—An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the individual's attorney and use the trade secret information in the court proceeding, if the individual—
      - (a) files any document containing the trade secret under seal; and
      - (b) does not disclose the trade secret, except pursuant to court order.
  - g) Employees with any questions regarding this policy should contact the Compliance Officer.

Good Days reserves the right to revise this policy at any time.