



OREGON SOCIETY OF HEALTH-SYSTEM PHARMACISTS

Whistleblower Policy

Introduction

Oregon Society of Health-System Pharmacists' (OSHP) Code of Ethics and Conduct requires directors and officers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of OSHP, 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 officers and directors to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

Retaliation

No member of the Board of Directors who in good faith reports a violation of the Code shall suffer harassment or retaliation. A member of the Board of Directors who retaliates against someone who has reported a violation in good faith is subject to removal from their position in accordance with Article VI, Section 7 of the association's bylaws. This Whistleblower Policy is intended to encourage and enable volunteers and others to raise serious concerns within OSHP prior to seeking resolution outside OSHP.

Reporting Violations

The Code addresses OSHP's open door policy and suggests that volunteers share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the President is in the best position to address an area of concern. However, if you are not comfortable speaking with the President or you are not satisfied with the President's response, you are encouraged to speak with a representative of the management company. The President or management representative are required to report suspected violations of the Code of Conduct to OSHP's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following OSHP's open door policy, individuals should contact the Compliance Officer directly.

Compliance Officer

The Compliance Officer could be a committee of the board, a designated director, or third party such a representative of the management company. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicated a violation of the Code. 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 Compliance Officer will notify 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.