

Challenge Whistleblower Protection Policy

The Whistleblower Protection Policy is intended to encourage and enable employees and other to raise serious concerns internally so that Challenge can address and correct inappropriate conduct and actions. It is the responsibility of all Challenge Employee, Contractor, Board Member or Affiliate board members, employees, contractors and volunteers to report any activity if the individual has a reasonable good faith basis to believe that there has been a violation of applicable laws, rules, regulations, accreditation standards, standards of ethical practice, or the Corporate Compliance Plan.

Reporting Procedure

Each employee has a responsibility to report through our compliance processes. These reports may be made in person, in writing, or over the phone and can be made anonymously. It is best practice, when one is comfortable and thinks it appropriate under the circumstances, for concerns to be raised first with one's supervisor. All Challenge Employees, Contractors, Board Members and Affiliates are strongly encouraged to bring any and all concerns to the attention of the Compliance Officer, either immediately upon learning of the potential problem, or upon determining through meeting with their supervisor that their concerns have not been satisfactorily or completely addressed. Concerns can also be raised with other Senior Management or the Human Resources Associate. If the suspected violation is on an organization-wide level or by Senior Management, the report of wrong doing should be made to the Chair of the Board of Directors. Report of suspected fraud or other compliance problems can also be made anonymously to the Compliance Officer or Challenge President by mail or placing a sealed envelope in their respective mailboxes.

In cases of serious crimes against person or property such as assault or rape, this should immediately be reported to local law enforcement personnel directly as well as reporting to Challenge.

Acting in Good Faith

An employee need not be absolutely certain that a violation has occurred before making a report; reasonable belief that a violation has occurred is sufficient. Reporting enables Challenge to investigate potential problems quickly and to take prompt action to deal with them. Any allegations that prove to not be substantiated and have been maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

We are committed to making every effort to maintain, within the limits of the law, that the identity of any individual who reports a concern in good faith will be kept confidential, consistent with the need to conduct an adequate investigation.

No Retaliation

It is Challenge's policy to protect any Employee, Contractor, Board Member or Affiliate who in good faith reports to the appropriate person any suspected ethics, legal, regulatory or other compliance violation governing the operations of Challenge. Supervisors may not prevent reporting of wrong-doing nor influence their attempt to report by threat or harassment. Anyone who has been subjected to retaliation for reporting wrong-doing, or interference with an attempt to report it, should make a complaint to the Compliance Officer or Human Resources Associate. An employee who retaliates against someone who has reported a suspected violation in good faith is subject to discipline up to and including termination of employment. It is Challenge's policy to refer any criminal act of retaliation or interference to the proper law enforcement authority.