

# Vista Policies and Procedures

Policy Name: Whistleblower  
Policy Number: HR 132  
Policy Holder: Director of Human Resources  
Original Effective Date: July 1, 2017  
Revision Date: January 1, 2018

A whistleblower, as defined by this policy, is a Vista employee who reports an activity that he or she considers to be dishonest, unethical, or illegal. The whistleblower is not responsible for investigating the activity, or for determining fault or corrective measures. A non-exhaustive list of examples of illegal or unethical activities include the following:

- Violations of Federal, State, or Local laws
- Fraud or theft
- Billing for services not performed
- Fraudulent financial reporting

Vista employees are expected to report to Vista any possibly dishonest, unethical, or illegal conduct. If an employee has knowledge or concern of such conduct, the employee must contact his or her immediate supervisor or the Director of Human Resources immediately. The employee must exercise sound judgment to avoid baseless allegations. Malicious or bad faith reporting will not be tolerated and may lead to disciplinary actions, including termination. Whistleblower protections are provided in two important areas: confidentiality and non-retaliation.

Non-anonymous reporting is strongly encouraged, and the reporter's identity will be kept confidential through all stages of the process. The reporter's identity may be disclosed to the people involved in conducting the investigation, who shall keep the reporter's identity confidential, and may also be disclosed where required pursuant to applicable law, such as in the case of subsequent judicial proceedings.

Employees who, in good faith, report a complaint or concern, or participate or assist in an investigation or proceeding, under this policy will not face any retaliation or sanctions as a result of their report, even if the reported concern is subsequently found to be unsubstantiated. This non-retaliation protection includes, but is not limited to, protection from retaliation in the form of an adverse employment action, such as termination, compensation decrease, poor work assignments, or threats of harm.

Vista also respects the fundamental rights and freedoms of reported persons and will undertake all reasonable measures to protect the data and reputation of the accused in order to avoid stigmatization or victimization. Any whistleblower who believes he or she is being retaliated against must contact their immediate supervisor or the Director of Human Resources

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as soon as possible. The protection does not include immunity for any personal wrongdoing that is alleged and investigated. Vista takes all complaints of retaliation very seriously. All such complaints will be reviewed promptly and, where appropriate, investigated. Any employee who violates this prohibition against retaliation is subject to disciplinary action, up to and including termination of employment.

Director of Human Resources Signature: \_\_\_\_\_ Date of Approval: \_\_\_\_\_