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# DENVER PET PARTNERS – POLICY STATEMENT

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## **WHISTLEBLOWER POLICY**

### **PURPOSE**

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The purpose of this Whistleblower Policy is to facilitate compliance by Denver Pet Partners and its representatives with applicable laws, corporate policy and generally accepted accounting practices by establishing a system for the reporting and handling of violations and concerns.

### **SCOPE OF POLICY**

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This Policy applies to all directors, officers, volunteers, employees and agents (including but not limited to consultants and contractors) of Denver Pet Partners.

### **REPORTING RESPONSIBILITY**

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Each person covered by this Policy is responsible for reporting what he or she believes to be a material violation of law or corporate policy or a questionable accounting or auditing matter by either Denver Pet Partners or a representative of Denver Pet Partners performing services relative to Denver Pet Partners. This responsibility includes notifying Denver Pet Partners if an action needs to be taken for Denver Pet Partners to be in compliance with the law or corporate policy or with generally accepted accounting practices.

The types of concerns that should be reported include, for example and without limitation, the following:

- Supplying false or misleading information on Denver Pet Partners' financial documents, reports to grantors and supported organizations, tax returns or other public documents;
- Providing false information to or withholding material information from Denver Pet Partners' auditors, accountants, lawyers, directors or other representatives responsible for Denver Pet Partners' compliance with fiscal and legal responsibilities;
- Deficiencies in or non-compliance with Denver Pet Partners' internal accounting controls, policies or procedures;
- Embezzlement, misappropriation of funds or private benefit (i.e., use of Denver Pet Partners' assets for personal gain or benefit);
- Violation of national Pet Partners® or Denver Pet Partners' corporate policies;
- Discrimination by reason of race, color, religion, national origin, gender, age, sexual orientation, gender variance, marital status, military status or physical or mental disability;
- Payment for services or goods that are not rendered or delivered; and
- Planning, facilitating or concealing any of the above or similar actions.

## **NO RETALIATION**

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Denver Pet Partners will use its best efforts to protect against retaliation any person covered by this Policy who in good faith reports a suspected violation or concern. Anyone who retaliates against someone who has submitted a report in good faith is subject to discipline up to and including termination or removal from his or her position. Any perceived retaliation should also be reported as described below. This Policy is intended to encourage and enable individuals to raise serious concerns within Denver Pet Partners for internal investigation and appropriate action.

## **REPORTING VIOLATIONS AND CONCERNS**

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Violations or concerns are to be submitted to the Executive Director or any Board member. All reports must be in writing and provide as many relevant details as possible, including a description of the questionable practice or behavior, the names of any persons involved, the names of possible witnesses, dates, times and places. Although Denver Pet Partners will accept anonymous reports, it is important to understand that anonymity can hinder investigation, since it is impossible to seek additional information from an anonymous source. For that reason, it is essential that anonymous reports contain as much specific information as possible. Anyone reporting a suspected violation is therefore strongly encouraged to provide their name and contact information which will be kept in the strictest confidence.

## **HANDLING OF REPORTED VIOLATIONS AND CONCERNS**

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Denver Pet Partners will investigate all reports submitted in accordance with this Policy with due care and promptness. Anyone who receives a report must promptly acknowledge its receipt (if possible), and conduct an investigation to determine if the allegations are true, whether the issue is material and what actions, if any, are necessary to correct the problem. Upon the conclusion of this investigation, such person will promptly report his or her findings to the Board.

## **ACTING IN GOOD FAITH**

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Anyone submitting a report under this Policy must do so in good faith and have reasonable grounds for believing the matter reported involves a material violation of law or corporate policy or a questionable accounting or auditing matter. Anyone who submits a report under this Policy that is *both* (i) not confirmed *and* (ii) made maliciously, recklessly, with gross negligence or with the knowledge that the allegations are false, is subject to discipline up to and including termination or removal from their position.

## **CONFIDENTIALITY**

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Reports of suspected violations or concerns, and investigations pertaining thereto, will be kept confidential to the extent possible. However, consistent with the need to conduct an adequate investigation and take corrective action, Denver Pet Partners cannot guarantee complete confidentiality. Disclosure by Denver Pet Partners' staff or other representatives of information relating to an investigation to individuals not involved in the investigation may result in disciplinary action up to and including termination or removal from their position.

## AUTHORITY

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The Board or any committee designated by the Board has full authority to investigate suspected violations and concerns reported under this Policy and may retain outside legal counsel, accountants, private investigators or any other resource that the Board or committee reasonably believes is necessary to conduct a full and complete investigation of the allegations.

Denver Pet Partners reserves the right to amend and/or supplement this Policy at any time.

Adopted by DPP Board of Directors: 2013-March-12



Printed Name: Ken McQuarrie  
Title: Secretary