



Governance: Whistleblower Policy

I. Purpose

Tabby's Place requires all employees to observe high standards of ethics in the conduct of their duties and responsibilities, to practice honesty and integrity in the fulfillment of their duties and responsibilities, and to always comply with applicable federal, state and local laws and regulations. Because of its commitment to ensuring ethical and lawful conduct in its workplace, Tabby's Place strives to provide for open discussion of its business practices and encourages its employees to immediately report to Tabby's Place any serious concerns they may have.

The [Conscientious Employee Protection Act](#) (CEPA) is a New Jersey law prohibiting employers from taking retaliatory actions against employees who report or refuse to engage in unlawful activities. It is New Jersey's employment law on "whistleblowing." The law is intended to encourage employees to come forward when they believe their employer is engaging in illegal activities.

Tabby's Place complies with, and expands upon, the protection afforded to an employee by the NJ Conscientious Employee Protection Act (see Additional Protections, below).

II. Persons Concerned

This statement applies to all employees.

III. Reporting Requirements

The CEPA prohibits an employer from taking retaliatory action against an employee for disclosing (or threatening to disclose) an activity, policy or practice of the employer that the employee reasonably believes is illegal, fraudulent, or criminal. The disclosure may be made to either a supervisor or a public body (legislative body, judicial officer, grand jury, administrative agency, law enforcement agency, department in the executive branch, or any subdivision; federal, state, or local).

However, there is an important caveat for employees who disclose information to a public body and seek protection under CEPA. An employee must first inform the organization of the alleged violation and allow the employer a reasonable opportunity to correct the violation.

An exception to this requirement is made in two instances: (1) where the employee is reasonably certain that a supervisor is aware of the violation, and (2) where the employee reasonably fears physical harm in retaliation for the disclosure and the situation is emergency in nature.

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Reporting

An employee who believes that Tabby's Place has engaged (or plans to engage) in illegal, fraudulent or illegal activity is encouraged to complete the appropriate form.

An employee may submit the form anonymously but must provide as much information and detail as possible to allow Tabby's Place to conduct a thorough investigation.

IV. Non-Retaliation

Tabby's Place will not tolerate and expressly prohibits disciplinary, retaliatory or other adverse employment actions taken against any employee who, in good faith:

- discloses or threatens to disclose to a supervisor or public body an activity, policy, or practice of Tabby's Place they reasonably believe is in violation of the law, or rule or regulation promulgated pursuant to law.
- provides information to, or testifies before, any public body conducting an investigation, hearing or inquiry into any violation of law, or rule or regulation promulgated pursuant to law, by Tabby's Place.
- provides information to any public body involving deception of, or misrepresentation to, any client, customer, employee, former employee, retiree or pensioner of Tabby's Place.
- provides information to any public body regarding any perceived criminal or fraudulent activity, policy or practice of deception or misrepresentation which the employee reasonably believes may defraud any client, customer, employee, former employee, retiree or pensioner of Tabby's Place.
- objects to or refuses to participate in any activity, policy, or practice that they reasonably believe to be in violation of law, or rule or regulation enacted by law, to be fraudulent or criminal in nature, or incompatible with a clear mandate of public policy concerning the public health, safety or welfare.

Any employee who retaliates against someone who has reported a suspected violation in good faith is subject to disciplinary action up to and including termination of employment.

V. Company Investigation of Complaints

Upon receipt of any reported concerns as described above, Tabby's Place will launch an investigation. Reports of violations or suspected violations will be kept confidential, to the extent possible under the circumstances, consistent with the need to conduct an adequate investigation.

Appropriate corrective action will be taken if warranted by the investigation, in Tabby's Place's sole discretion. Employees engaging in conduct which is in violation of law, or rule or regulation promulgated pursuant to law, is otherwise fraudulent or criminal in nature, or is incompatible with a clear mandate of public policy concerning the public health, safety or welfare shall be subject to disciplinary action, up to and including termination of employment.

The Executive Director will advise the Board of Trustees of all complaints and their resolution.

VI. Additional Protections

This Tabby's Place Whistleblower policy extends the same protections to employees who disclose any serious violation of Tabby's Place policies, which would not otherwise fall under the CEPA.

Serious violations include, but are not limited to, anything that creates a danger to the cats or humans at Tabby's Place, destruction of Tabby's Place property, a breach of confidentiality, medication misuse or abuse, or damages Tabby's Place reputation.