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EMPLOYEE ISSUES AND GRIEVANCES

A. POLICY

It is the policy of SURA to provide a means for employees to: (1) seek information and discuss matters of concern and to obtain fair and objective answers to their questions, issues, and complaints; (2) report concerns regarding safety, health, or environment; and, (3) to report fraud, waste, abuse, or suspected illegal, unethical, or inappropriate activities in SURA's financial management.

This policy and its procedures do not apply to complaints of harassment or discrimination, which should be addressed in accordance with SURA's policy on harassment (Section 208.04).

SURA shall make an affirmative effort to post in the workplace notices of the Office of the Inspector General hot lines for agencies and other organizations with which SURA does business (e.g., Notice 208.14-1).

The President, Vice President(s), Executive Director, and Chief Financial Officer, as corporate officers, are responsible for discussing with any employee the purpose of this policy and the procedures below.

B. THE IMPORTANCE OF REPORTING

1. Employees who have issues or complaints about work-related matters are strongly encouraged to seek resolution through this issues and grievance process, which includes informal discussion.
2. It is the responsibility of SURA employees to report any suspected adverse environmental, health, or safety condition or violation of SURA's policy on environment, health and safety (Section 103.01).
3. It is the responsibility of SURA employees to eliminate waste, fraud and abuse in its operations and to assure that SURA's accounting and record keeping adhere to the highest ethical standards (Section 208.14). All SURA employees are responsible for reporting suspected waste, fraud, theft, misappropriation of funds and other financial irregularities.
4. Employees who believe that a fellow employee is violating the SURA ethical standards or otherwise acting in an illegal or unethical manner must report it. Doing so will not be considered an act of disloyalty, but an action which shows the employee's sense of responsibility and fairness to SURA, its customers, and fellow employees. Doing so will also help safeguard SURA's reputation and assets.
5. Reporting violations of the SURA ethical standards is also necessary because in some cases failure to report an illegal act by another person is itself a criminal act.

C. PROCEDURE FOR WORKPLACE ISSUES

1. Most workplace issues can be resolved informally at the immediate supervisor level. When an employee has a question or concern about working conditions, job safety, rate of pay, payroll classification, or other matters pertaining to his/her employment at SURA, he/she should first consult with his/her immediate supervisor.
2. When an employee raises such an issue, the supervisor shall address the inquiry promptly, and provide the appropriate requested information or attempt to solve the problem in a professional, reasonable, and timely manner. In addressing employee issues, supervisors and employees may seek the assistance of the Executive Director whenever necessary.

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3. Such issues that are not resolved by the supervisor may be addressed to the Executive Director for final resolution.
4. If an employee believes that such an issue cannot be resolved with the employee's immediate supervisor, the employee may address the issue first with the Executive Director. If the issue involves the Executive Director, the employee may address the issue first with the President.

D. PROCEDURE FOR EH&S ISSUES

1. If an employee or individual associated with SURA has a complaint about an environmental, health or safety condition, he/she should inform her/his supervisor (a non-employee should inform a member of SURA management) immediately. Supervisors are responsible for addressing and resolving EH&S concerns to ensure SURA adheres to its policy on Environment, Health and Safety (Section 103.01).
2. Employees and other persons can anonymously make a report of violations of environmental, health or safety standards to the President or any other corporate officer.

E. PROCEDURE FOR REPORTS OF ETHICAL, FRAUD AND FINANCIAL ISSUES

1. If an employee believes that there has been a violation of the SURA ethical standards, suspected theft, misappropriation of funds or other financial irregularities, the employee must report the violation.
2. Reports of such violations should be made to the Executive Director, to the President or to any other corporate officer.
3. Individuals who are not employees of SURA, but associated with its programs, should report suspected theft, misappropriation of funds, and other fiscal irregularities, to the Executive Director, to the President or to any other corporate officer.
4. Employees and other persons can anonymously make a report of violations of SURA ethical standards, suspected theft, misappropriation of funds, and other fiscal irregularities to the President or any other corporate officer.

F. CONFIDENTIALITY AND RETALIATION

1. All issues and grievances will be kept confidential to the extent practicable, with information disclosed only on a need to know basis.
2. As noted above, issues and reports of violations of environmental, health, or safety standards, SURA ethical standards, suspected theft, misappropriation of funds, and other fiscal irregularities may be made anonymously to the President or any other corporate officer.
3. No employee or other person raising an issue or grievance in good faith regarding adverse environmental, health or safety conditions, violations of SURA ethical standards, suspected theft, misappropriation of funds, or other fiscal irregularities will be subject to retaliation.
4. It is unacceptable to raise an issue or grievance knowing it to be false.

G. HANDLING OF ISSUES AND REPORTS

Issues and grievances will be resolved by SURA on a case by case basis. SURA, and its counsel, will investigate allegations as appropriate.