

**CAPITAL OF TEXAS PUBLIC TELECOMMUNICATIONS COUNCIL (AUSTIN PBS)  
WHISTLEBLOWER PROTECTION POLICY  
2019-2020**

Austin PBS requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the station, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

**Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Austin PBS can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Austin PBS's policies or suspected violations of law or regulations that govern Austin PBS's operations.

**No Retaliation**

It is contrary to the values of Austin PBS for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the station. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

**Reporting Procedure and Handling of Reported Violations**

Austin PBS has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Vice President of Human Resources or the General Manager. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Austin PBS's Vice President of Human Resources, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the General Manager.

Austin PBS has also engaged Lighthouse Services to provide a secure hotline for making anonymous reports. Austin PBS's General Manager, Vice President of Human Resources, and Board Chair receive monthly reports on all hotline activity.

Austin PBS's Vice President of Human Resources is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Vice President of Human Resources will advise the General Manager and/or the Board of Directors Chair of all complaints and their resolution and will report at least annually to the Board Chair.

Initial Inquiries

The Vice President of Human Resources will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed action without the need for investigation.

### Report to Complainant

Whether reported to Austin PBS personnel or through the hotline, the complainant will be given the opportunity to receive follow-up on their concern:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling them whether initial inquiries have been made;
- Telling them whether further investigations will follow, and if not, why not.

### Further Information

The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the complainant remains accessible for follow-up. Further information may be sought from the complainant.

Subject to legal constraints the complainant will receive information about the outcome of any investigations.

### **Accounting and Auditing Matters**

Austin PBS's Vice President of Human Resources shall immediately notify the CFO, as deemed appropriate, and the Audit Committee/Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### **Confidentiality**

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.

FORMAL APPROVAL: The Austin PBS Whistleblower Protection Policy was approved by Austin PBS Board of Directors on November 21, 2019.

Laura Beckworth  
Laura Beckworth (Nov 22, 2019)

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Laura Beckworth  
Chair, Board of Directors

Nov 22, 2019

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Date