

HOTLINE POLICY

- Purpose:** To provide a mechanism for anonymous reporting of financial matters for the Tribal government and its enterprises.
- Scope:** The Tribal Government and all of its enterprise activities and financial matters related thereto.
- Policy:** All reports received on the hotline will be processed through the following hierarchy:

To preserve the integrity of the investigation and to ensure due process, The Appropriations and Finance Committee (AFCM) will receive via email all Ethics Point detail reports that have been filed. Once a month the Tribal Council will receive a report summarizing each report filed and the status of each report by division. Additionally, the following individuals shall receive the Ethics Point detail reports for the listed branch or department:

Tribal Government -Executive: Ethics Point detail reports will be sent to Tribal Administrator, CFO and Director of Human Resource Department (Tribal Governmental) the Tribal Chairman and Vice Chairman.

Tribal Government – Judicial: Ethics point detail reports will be sent to the Chief Judge, Associate Judge and Tribal Court Administrator.

Tribal Government –Legislative: Ethics point detail reports will be sent to the Legislative Leader and members of the Appropriations and Finance Committee.

Non-Gaming Enterprises: detail reports will be sent to Tribal Administrator, CFO, Enterprise Manager, Tribal Chairman and Vice Chairman.

Odawa Casino Resort: detail reports will be sent to the General Manager, Regulatory Director , and the Chief Financial Officer Valerie Tweedie.

Law Enforcement will be notified whenever there is a suspicion of criminal activity.

If any report recipient is named in a report he/she will not receive or have access to the report.

Recognizing the unique responsibilities of the Regulatory Commission, the Regulatory Director will notify the Gaming Regulatory Commission Chairperson only when a licensing issue may be present following an investigation.

All reports will be handled appropriately in a timely manner and in accordance with procedures.

Reports generated by the hotline shall be kept confidential and shall not be disseminated. Individual names mentioned in the report shall not be disclosed. Detail reports provided to the Appropriations and Finance Committee (AFCM) will be kept confidential. If a member of the AFCM is mentioned in the report or if the incident involves the department in which an AFCM member is employed that member shall not receive the details of that report.

Procedure:

1.0 REPORTS

- .1 All reports generated through the hotline will remain confidential. Reports will only be shared with those persons deemed necessary to provide proper documentation of the investigation.
- .2 The person doing the investigation shall retain the appropriate notes and records on file for one year. The web based system reports will be retained for a period of three years.
- .3 All designated report recipients in the executive branch will receive training on the system and be provided with a password for access to the appropriate level of reports based on the hierarchy outlined in the policy. The Appropriation and Finance Committee members shall receive all Ethic point detail reports by e-mail. Reports for the Legislative Branch and the Judicial Branch will be printed and forwarded by email to the respective branch for their follow up.
- .4 The CFO will generate the monthly report to the Chair/Vice Chair for the monthly report to the Tribal Council.
- .5 Cases deemed without merit will be noted and closed.

2.0 INVESTIGATIONS TRIBAL GOVERNMENT EXECUTIVE

- .1 Tribal Government detail reports will be received by the Chair, Vice Chair, Tribal Administrator, Tribal Human Resources Director, and the Chief Financial Officer. (Status will reflect reviewed)
- .2 The Tribal Administrator and the CFO; unless one of them is named in a report; will coordinate the various aspects of the investigation and determine the validity of the report and necessary steps for follow-up. If one is named the other will coordinate with the Tribal Chairman. (Status will be changed to in process)
- .3 Based on the initial information and investigation if the report is deemed without merit the status of the case will be changed to closed and the synopsis tab will note the outcome.

- .4 Based on the information obtained in the initial investigation corrective actions will be taken as deemed appropriate in cooperation with human resources and \ or Tribal Law Enforcement. (Status will be changed to closed) If a report is referred to Law Enforcement the status will remain in process until either the Tribal Administrator or the CFO is notified that law enforcement will pursue the investigation and refer to the Tribal Prosecutor if deemed appropriate. Once notified they will pursue the investigation the case will be marked closed in ethics point and the outcome will note referred to law enforcement.
- .5 An updated report shall be provided to the Appropriation and Finance Committee upon the change of status of the case.

3.0 INVESTIGATIONS TRIBAL GOVERNMENT JUDICIAL

- .1 Tribal Government Judicial detail reports will be received by the Chief Judge, Associate Judge and Tribal Court Administrator. CFO will access only to administrate the system, run reports, and reflect status changes and outcomes communicated from the court. (Status will reflect reviewed)
- .2 The Tribal Court Administrator and one of the Justices; unless one of them is named in a report; will coordinate the various aspects of the investigation and determine the validity of the report and necessary steps for follow-up. If one is named the other will coordinate with the other or a member of the Appellate Court. (Status will be changed to in process) If the report does not concern an employee or process of the judiciary it will be forwarded to the appropriate division without further investigation, and the referral shall be noted under the synopsis and outcome.
- .3 Based on the initial information and investigation if the report is deemed without merit the status of the case will be changed to closed and the synopsis tab will note the outcome.
- .4 Based on the information obtained in the initial investigation corrective actions will be taken as deemed appropriate in cooperation with human resources and \ or Tribal Law Enforcement. (Status will be changed to closed) If a report is referred to Law Enforcement the status will remain in process until either the Tribal Court Administrator or Chief Judge or Associate Judge is notified that law enforcement will pursue the investigation and refer to the Tribal Prosecutor if deemed appropriate. Once notified that law enforcement will pursue the investigation, the case will be marked closed in ethics point and the outcome will note referred to law enforcement.
- .5 An updated report shall be provided to the Appropriation and Finance Committee upon the change of status of the case.

4.0 INVESTIGATIONS TRIBAL GOVERNMENT LEGISLATIVE

- .1 Tribal Government Legislative Reports will be received by the Legislative Leader and the Appropriations and Finance Committee CFO will access only to administrate the system, run reports and reflect status changes and outcomes communicated by the legislative leader or AFCM. (Status will reflect reviewed)
- .2 The AFCM will coordinate the various aspects of the investigation and determine the validity of the report and necessary steps for follow-up. (Status will be changed to in process) If the report does not concern an employee or process of the legislative branch it will be forwarded to the appropriate division without further investigation, and the referral shall be noted under the synopsis and outcome.
- .3 Based on the initial information and investigation if the report is deemed without merit the status of the case will be changed to closed and the synopsis tab will note the outcome.
- .4 Based on the information obtained in the initial investigation corrective actions will be taken as deemed appropriate in cooperation with human resources and \ or Tribal Law Enforcement. (Status will be changed to closed) If a report is referred to Law Enforcement the status will remain in process until either the AFCM or the Legislative Leader is notified that law enforcement will pursue the investigation and refer to the Tribal Prosecutor if deemed appropriate. Once notified that law enforcement will pursue the investigation, the case will be marked closed in ethics point and the outcome will note referred to law enforcement.
- .5 An update will be provided to the Appropriation and Finance Committee upon the change of status of the case whether closed or referred

5.0 INVESTIGATIONS NON-GAMING ENTERPRISES

- .1 Non Gaming Enterprise Reports will be received by the Chair, Vice Chair, Tribal Administrator, and/or General Manager or manager of the enterprise and/or the Chief Financial Officer. (Status will reflect reviewed)
- .2 The Tribal Administrator, and/or general manager or manager and/or the CFO, excluding anyone of them if named in the report, will coordinate the various aspects of the investigation and determine the validity of the report and necessary steps for follow-up. (Status will be changed to in process)
- .3 Based on the initial information and investigation if the report is deemed without merit the status of the case will be changed to closed and the outcome under the synopsis will be noted.
- .4 Based on the information obtained in the initial investigation corrective actions will be taken as deemed appropriate. (Status will be changed to closed) If a report is referred to Law Enforcement the status will remain in process until either the Tribal Administrator or the CFO is notified that law enforcement will pursue the

investigation and refer to the Tribal Prosecutor if deemed appropriate. Once notified they will pursue the investigation the case will be marked closed in ethics point and the outcome will note referred to law enforcement

- .5 An updated report shall be provided to the Appropriation and Finance Committee upon the change of status of the case.

6.0 INVESTIGATIONS ODAWA CASINO RESORT

- .1 Odawa Casino Resort Reports will be received by the Gaming Regulatory Director, General Manager and the Chief Financial Officer. (Status will reflect reviewed)
- .2 The Regulatory Director will direct the investigation and coordinate with the General Manager as deemed appropriate. If either is named in the report the unnamed and the CFO will coordinate the investigation and refer to the appropriate regulatory body. (Status will be changed to in process)
- .3 Based on the initial information and investigation the Regulatory Director and the General Manager will collectively determine if the report is deemed without merit and the status of the case will be changed to closed and the outcome under the synopsis will be noted.
- .4 Based on the information obtained in the initial investigation corrective actions will be taken as deemed appropriate in cooperation with human resources, gaming regulatory and \ or Tribal Law Enforcement. (Status will be changed to closed) If a report is referred to Law Enforcement the status will remain in process until either the Gaming Regulatory Director, General Manager or the CFO is notified that law enforcement will pursue the investigation and refer to the Tribal Prosecutor if deemed appropriate. Once notified they will pursue the investigation the case will be marked closed in ethics point and the outcome will note referred to law enforcement.
- .5 An updated report shall be provided to the Appropriation and Finance Committee upon the change of status of the case.

7.0 DEFINITIONS

- 7.1 Status of reports are defined as follows:

Un-reviewed means a report has been filed through the Ethics Point Reporting System, the report has not yet been reviewed for the next step in follow up of the report.

Reviewed means a report has been filed through the Ethics Point Reporting System and initial discussion and follow up is underway to determine if the report has merit and if it requires more intense investigation and follow up.

In Process means the report filed through the Ethics Point Reporting System is still in the process of investigation. All cases referred to law enforcement will be listed as “in process” pending the Tribal Law Enforcement’s determination for follow up.

Resolved means the report filed through the Ethics Point Reporting System has been determined to be frivolous, without merit, or inadequate information was available to reach a conclusion about the report. Used for old reports only, all cases will be closed and outcomes noted moving forward.

Closed means the report filed through the Ethics Point Reporting System was investigated and appropriate action has been taken. For example; referred to prosecutor, change in internal controls to prevent future activity, or disciplinary action was taken with respect to the employee, report was without merit or unsubstantiated. Under the synopsis tab the outcome will be noted.

7.2 For all divisions the following violation categories are:

Account, Auditing and Financial Controls: Concerns regarding questionable practices relating to accounting, auditing or internal financial controls.

Accurate Books and Records: The unethical systematic recording and analysis of the business and financial transactions associated with generally accepted accounting practices.

Misappropriation: Misappropriation refers to the unauthorized or improper use of Little Traverse Bay Bands or any of its enterprises, intellectual property rights, including patents, trademarks, copyrights and trade secrets.

Improper Supplier or Contractor Activity: Supplier or contractor activity in violation of Tribal policies and procedures; improper supplier or contractor selection based on personal gain, improper negotiation or diversion of contract awards.

Embezzlement: To appropriate (as property entrusted to one’s care) fraudulently to one’s own use.

Theft: The act of stealing; specifically: the taking and removing of personal property with intent to deprive the rightful owner of it.

Misuse of Assets or Services: Use of Tribal resources or equipment without permission for non-business reasons.