

THE CENTER FOR DISCOVERY

SUBJECT: Corporate Compliance Hotline

MANUAL: Corporate Compliance

SECTION: Section 4

Purpose:

A primary function of the Corporate Compliance Office is to ensure that employees and others working or acting on behalf of The Center for Discovery have a variety of outlets to report problems and concerns. The hotline provides an outlet and also allows employees and others to report anonymously or confidentially thereby avoiding fear of disclosure of their identity. The purpose of this hotline is to ensure the timely identification and resolution of all issues that may adversely affect employees, people served or The Center for Discovery. The Hotline is one of several communication channels to report problems and concerns. Employees and others working or acting on behalf of The Center for Discovery are expected to report problems or concerns through one of a variety of avenues, including the hotline, when they believe a potential violation has taken place.

Policy:

1. The Center for Discovery has established a **Corporate Compliance Hotline**, and has made the number **1-845-707-8811** readily available to all employees, independent contractors, volunteers, and other members of the Center for Discovery community by conspicuously posting the telephone number in common work areas. It is also available to vendors and contractors via the CFD website. Individuals may report matters on a confidential basis. Matters reported through the Hotline or other communication sources that suggest substantial violations of compliance policies, regulations, or statutes will be documented, reported to the CCO, and investigated promptly to determine their veracity. All employees and others working or acting on behalf of The Center for Discovery are responsible for reporting misconduct, including actual or potential violations of law, regulation, policy, procedure, or the Code of Conduct. Reports can be made anonymously and all will be held confidential to the extent permitted by law. If disclosure is required and turned over to law enforcement, confidentiality will be protected to the extent permitted by law.
2. The Center for Discovery maintains a formal non intimidation and non retaliation policy on which all affected individuals are trained. Employees and others working or acting on behalf of The Center for Discovery who report problems and concerns via the Hotline in good faith will be protected from any form of intimidation, retaliation or retribution. Any employee who commits or condones any form of intimidation or retaliation will be subject to discipline up to and including termination (see Non-Intimidation/ Non Retaliation Policy). Any indication of a violation of this policy will be investigated immediately by the Corporate Compliance office
3. All those who are employed in the Corporate Compliance Office are expected to act with utmost discretion and integrity in ensuring that information received is acted upon in

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accordance with adopted policies.

4. The Corporate Compliance Officer is responsible for the daily operation of the Corporate Compliance Hotline.

Procedures:

1. Anyone with knowledge of a potential violation of law, regulation, the Code of Conduct, policy, or procedure has a duty to report that information to the Corporate Compliance Officer. Failure to report a potential violation will result in disciplinary action.
2. Reporting confidentially to the Corporate Compliance Officer can be done directly by calling the Corporate Compliance **Hotline (1-845-707-8811)** 24 hours a day, 365 days a year.
3. The Corporate Compliance Officer or designee, will log all calls made to the Hotline to include the nature of the complaint or violation reported, the date and time reported, the source of the information (if provided), and the department or facility affected. Should a designee receive this information, it will be immediately reported to the CCO.
4. The Corporate Compliance Officer will determine what further investigation is required into the reported complaint or potential violation.
5. Disciplinary and/or corrective action for all substantiated allegations will be an integral part of the compliance program. Disciplinary action will be fairly and firmly enforced regardless of violator's position within the CFD Community
6. The Corporate Compliance Officer is responsible for the Hotline operation. This includes ensuring that all Hotline calls are addressed in an appropriate and timely manner, as well as in accordance with all other related policies and procedures
7. Anyone assigned to answer the Hotline or retrieve messages thereof will be properly trained by the Corporate Compliance Officer and will immediately report calls to the CCO.
8. Whenever callers disclose their identity, it will be held in confidence to the fullest extent practical or allowed by law.
9. The Corporate Compliance Officer will communicate any matter deemed potentially unlawful to legal counsel and all appropriate authorities .

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10. Calls will be documented on the confidential Corporate Compliance Hotline Log. All call records will be logged and sequentially numbered upon receipt on this form, and placed in the care and custody of the Corporate Compliance Officer.
11. The CCO or designee will contact the caller if contact information is left in the message, to acknowledge their call and to obtain additional information. When a Hotline call cannot be resolved while the caller is on the line, a follow-up review or investigative actions will be taken. The caller may be asked to call back at an agreed date and time in case additional information is needed.
12. The Hotline operation will at times, involve other departments, as appropriate, for advice or further investigation. In the event that the Corporate Compliance Officer is not satisfied that a matter brought before the aforesaid departments was appropriately addressed and resolved, the Corporate Compliance Officer will be responsible for and is authorized to take the matter to other persons in positions of authority.
13. The Corporate Compliance Officer will report quarterly to both the Governance and Corporate Compliance Committee of the Board of Directors regarding Hotline activity. This report will include the total number of calls received and acted upon and the general results from the Hotline operation. In addition, the report will include any recommendations for system-wide improvements or corrective actions arising from the results of the operation and related investigations.
14. Department Directors must take appropriate measures to ensure support for this policy and encourage the reporting of problems and concerns. All staff are reminded of the use of the Hotline while completing their annual Corporate Compliance Training. . Additionally, the number for the hotline is conspicuously posted throughout the agency as well as within the Corporate Compliance Program policies on the CFD website.

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