

THE CENTER FOR DISCOVERY

SUBJECT: Compliance Office Confidentiality

MANUAL: Corporate Compliance

SECTION: Section 2

Purpose:

To ensure that anyone working in or on behalf of the Corporate Compliance office at the Center for Discovery will protect confidential information received during the course of employment in that capacity. Protecting the confidentiality of individuals reporting potential violations of law, regulation, policies, standards of conduct or other wrongdoing, to the extent permitted by law, is a critical responsibility of the Corporate Compliance Office.

Policy:

1. Confidential information is defined as all information obtained by an individual working on behalf of The Center for Discovery which is unknown to the general public and/or the employee population. This includes, but is not limited to, financial information, technical information, information relating to the contents of contracts, or any other proprietary or valuable information of the Center for Discovery and its related entities.

Procedure:

1. All new employees of the Corporate Compliance office will be trained in maintaining confidentiality of records that come into their possession or to which they have access. All job descriptions in the Compliance Office will include provisions related to protection of confidential information.
2. It is the expectation of all Center for Discovery employees that confidential information is protected.. This is covered in the Corporate Compliance training that is provided to all staff during orientation and annually thereafter
3. Records relating to information provided confidentially cannot be disclosed or released unless it is required pursuant to a legal subpoena, court order, or by the direction of legal counsel.
4. If a situation arises where there is doubt about releasing confidential information, the Corporate Compliance Officer will consult with legal counsel.
5. All records of the Corporate Compliance Office will be securely maintained. The Corporate Compliance Officer and all those working in or on behalf of the compliance office will not engage in any casual conversations about individuals who have provided information to the office, or related to matters under review by the compliance office.
6. Failing to abide by this policy is grounds for immediate termination.

ORIGINAL DATE: 2/2012

SUPERSEDES: N/A

REVISION: 2 DATE: 6/1/1810/
2014 FILE NUM: CC-2.3

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7. Upon termination of employment, employees working in the Corporate Compliance Office or having access to confidential Compliance Office information must return any original or copy of any file, document, record, or memorandum relating in any manner whatsoever to their employment with the Center for Discovery.

ORIGINAL DATE: 2/2012

SUPERSEDES: N/A

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