

THE CENTER FOR DISCOVERY

SUBJECT: Protecting Reporter Confidentiality

MANUAL: Corporate Compliance

SECTION: Section 4

Purpose:

The Center for Discovery has established a procedure whereby employees and others working on behalf of the Center for Discovery who desire not to have it known that they have reported a matter to the Corporate Compliance Office can confidentially report problems, concerns, and potential violations of federal, state and local laws, regulations, the code of conduct, and policies and procedures by contacting the compliance office directly or through the hotline.

Policy:

1. All members of the CFD Community are responsible for reporting misconduct, including actual or potential violations of law, regulation, policy, procedure, or the Code of Conduct, therefore, a telephone hotline has been established to enable individuals to report problems and concerns in confidence.
2. Employees who report problems and concerns via the Corporate Compliance Hotline in good faith will be protected from any form of retaliation or retribution.
3. Everyone who receives or is assigned responsibility for Hotline calls from employees shall agree to the terms of confidentiality.
4. Employees cannot exempt themselves from the consequences of their own misconduct by reporting the issue, although self-reporting may be taken into account in determining the appropriate course of action.
5. Callers who identify themselves will have their identity protected to the limit of the law.

Procedures:

1. Anyone with knowledge of a potential violation of law, regulation, the Code of Conduct, policy or procedure, has an affirmative duty to report that information to the Corporate Compliance Officers. Failure to report a potential violation will result in appropriate disciplinary action.
2. Reporting to the Corporate Compliance Officers can be done directly to the Compliance Office by telephone ((845) 707-8453) or by interoffice mail or regular mail, or by calling the Corporate Compliance Hotline (1-845-707-8811) 24 hours a day, 365 days a year.
3. No attempt will be made to identify callers who request anonymity. When they disclose their identity, it will be held in confidence to the fullest extent practical or allowed by law. If disclosure is required and turned over to law enforcement, confidentiality will be protected. Determinations as to the limit of confidentiality under the law will be made in consultation with legal counsel.

ORIGINAL DATE: 2/2012

SUPERSEDES: N/A

REVISION: 3

DATE: 7/23/19

FILE NUM: CC-4.5

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4. All Hotline calls will be logged in by the Corporate Compliance Officer, investigated or referred as necessary, and reviewed with the Governance and Corporate Compliance Committee of the Board of Directors on a quarterly basis via a summary report containing information on the nature of the call and the resolution.
5. Any violation of this policy may result in sanctions and penalties.

ORIGINAL DATE: 2/2012	SUPERSEDES: N/A	
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