

 St. Mary's Healthcare ST. MARY'S Organizational Policy Manual	Policy # AD 107	
	<u>Title:</u>	Non-Retaliation/Non-Retribution
	<u>Replaces Policy:</u>	
	<u>Policy Originator:</u>	<u>Corporate Responsibility Officer</u>
	<u>Concurrence:</u>	Corporate Responsibility Committee Audit and Compliance Committee of the Board Administrative Executive Committee
Chapter Title	<u>Effective Date:</u>	December 17, 2009
	<u>Reviewed/ Revised Date:</u>	July 1, 2014; February 24, 2021, 9/23/2024
	<u>Approval:</u>	<i>Lorelei Barrett, RHIA, CRC, CHRC</i>
	<u>Date:</u>	September 24, 2024

I. Policy Statement:

St. Mary's Healthcare (SMH) has implemented a compliance program that promotes the highest standard of ethical and legal conduct. Positive employee, as well as business relations and morale can be best achieved and maintained in a working environment that promotes ongoing open communication and transparency throughout the organization.

II. Purpose:

St. Mary's Healthcare (SMH) has implemented a compliance program that promotes the highest standard of ethical and legal conduct. Positive employee, as well as business relations and morale can be best achieved and maintained in a working environment that promotes ongoing open communication and transparency throughout the organization.

III. Policy

All associates, agents, officers, directors and volunteers are responsible for promptly reporting actual or potential violations of our Standards of Conduct; including an actual or potential violation of law, regulation, policy or procedure. The Corporate Responsibility Dept. will maintain an "open door policy" to allow individuals to report

problems and concerns. The means to do so are outlined in Corporate Responsibility Policy AD-59, Methods of Reporting Concerns. The Corporate Responsibility Dept. will act upon the concern promptly and in an appropriate manner to obtain the greatest level of resolution and response. Additionally, the Compliance Hotline is designed to permit individuals to call, anonymously or in confidence, to report problems and concerns or to seek clarification of compliance related issues. Associates, agents, officers, directors and volunteers, who report concerns in good faith, will not be subjected to retaliation, retribution, or harassment. No such party is permitted to engage in retaliation, retribution or any form of harassment against another party for reporting compliance-related concerns. Any retaliation that is deemed to have occurred, through investigation, shall constitute a critical violation of the organization's Standards of Conduct and shall be addressed accordingly. Associates, agents, officers, directors and volunteers cannot exempt themselves from the consequences of wrongdoing, misconduct or violations of the Standards of Conduct by self-reporting, although self-reporting may be taken into account in determining the appropriate course of action.

IV. Procedure

1. Knowledge of actual or potential wrongdoing, misconduct, or violations of the Standards of Conduct must be immediately reported to the Compliance Officer, or to the Compliance Hot Line (OIG and OMIG discourage any attempts to direct or redirect compliance concerns directly to supervisors, managers, etc.).
2. SMH Management level associates must maintain an open-door policy and take aggressive measures to assure their staff that the system truly encourages the reporting of problems/concerns and that there will be no retaliation, no retribution, or no harassment for reporting problems or concerns in good faith.
3. A copy of this policy must be provided to all SMH Associates, agents, officers, directors and volunteers and must additionally be available at all times to SMH associates via an electronic Policy Manager platform or directly from the Compliance Officer.
4. Confidentiality regarding associates, agents, officers, directors and volunteers voiced concerns or problems will be maintained at all times insofar as legal and practical to enable adequate investigation and appropriate course of action, informing only those personnel who have a need to know.

V. Definitions

Values Line 1-844-916-2768 or at

<https://secure.ethicspoint.com/domain/media/en/gui/74454/index.html>

VI. Appendix

VII. References

Part 521, Title 18 NYCRR

NYS Non-Profit Revitalization Act of 2013 Policy AD-#59

Policy AD-#91