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| <h1>Agency Policy Manual</h1> | | Section Policy |
|  | <input type="checkbox"/> Administration <input type="checkbox"/> Children's <input type="checkbox"/> Clinic <input type="checkbox"/> IFSS <input type="checkbox"/> Residential <input type="checkbox"/> SEMP <input checked="" type="checkbox"/> All | <u>Subject:</u> Corporate Compliance Policy: Employee Reporting Protection |
| | Prepared by: <u>Maryjoan L. Case</u> Title: <u>Corporate Compliance Director</u> CP Board Approval: _____ CP Chair Signature: _____ Date: _____ | Date Effective: <u>September 2007</u> Date Revised: |

General

CP Rochester's Code of Conduct ("Code") requires Board Members, Directors, employees and any other agent of CP Rochester to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of CP Rochester, we must practice honesty and integrity in fulfilling our responsibilities and in complying with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all Board Members, Directors, and employees to comply with the Code and to report violations or suspected violations in accordance with this Employee Reporting Protection Policy.

No Retaliation

No Board Member, Director, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. A Board Member who retaliates against someone who has reported a violation in good faith is subject to appropriate action up to and including removal from the Board. This Policy is intended to encourage and enable employees and others to raise serious concerns within CP Rochester prior to seeking resolution outside of CP Rochester.

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Reporting Violations

The Code addresses CP Rochester's "**Open Door**" practice and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with someone in the Human Resources Department or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to CP Rochester's Corporate Compliance Director, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or are uncomfortable with following CP Rochester's open door practice, individuals should contact the CP Rochester Corporate Compliance Director at 402-7440 ext. 848 or through the anonymous help line at 334-6000 ext. 353.

Compliance Director

CP Rochester's Corporate Compliance Director is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at her discretion, shall advise the Agency President and/or the compliance committee. The Corporate Compliance Director has direct access to the Board of Directors and is required to report to them at least annually on compliance activity. CP Rochester's Corporate Compliance Director is the chair of the Corporate Compliance/Quality Assurance Committee.

Corporate Compliance/Quality Assurance Committee

A representative of the board of directors shall participate as a member of CP Rochester's Corporate Compliance/Quality Assurance Committee and shall report all corporate compliance activity back to the full Board of Directors at the next scheduled Board meeting. The Corporate Compliance Director shall notify the Corporate Compliance/Quality Assurance Committee of all reported compliance issues and provide continuous updates at each Committee meeting until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by any agent of CP Rochester or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

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Handling of Reported Violations

The Corporate Compliance Director will notify the sender (if known) and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.