


Rescue Incorporated

<p>Policy: Anonymous Ethics Reporting Line</p> <p>Department: All Departments</p> <p>Approved by: Board of Directors</p> <p>Accountability: Chair of the Board of Directors, Chief Executive Officer, Chief Financial Officer, Chief Human Resources Officer, Chief Operating Officer, Clinical Director, Compliance Officer, Director of Nursing & Inpatient Services, and All Staff</p>	 <p>Effective Date: 2/18/19 Last Review Date:</p>
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PURPOSE:

To provide a communication channel for staff members or other stakeholders to report any activity or conduct that they suspect violates Rescue’s business ethics, laws and regulations, and Rescue policies and procedures. All concerns reported shall be investigated, and Rescue shall determine appropriate follow up action.

POLICY:

It shall be Rescue’s policy that when staff members or other stakeholders are concerned about possible compliance or ethical violations and have attempted to resolve and/or seek assistance in resolving the violations through normal channels, Rescue’s confidential reporting service, the Anonymous Ethics Reporting Line, may be used. Rescue shall be committed to investigating all credible and substantiated allegations of violations of business ethics, laws and regulations, and Rescue policies and procedures. While Rescue does not require that individuals (also known as “reporters”) disclose their identity when reporting such allegations, it is often necessary for Rescue to contact reporters to obtain additional information in support of their allegations in order to facilitate a full and complete investigation. When reporters use Rescue’s Anonymous Ethics Reporting Line, they are assigned a case number, which contains the details of their allegations and eliminates the need for the reporter to disclose their identity. As a result, in order to protect the identity of the reporter, anonymous allegations must be reported through the Anonymous Ethics Reporting Line in order to be investigated by Rescue. Unsubstantiated anonymous allegations reported through any other means cannot and will not be investigated by Rescue.

PROCEDURES:

What to report through the Anonymous Ethics Reporting Line:

1. Staff members or other stakeholders may report any situation or conduct believed to have violated an applicable law, regulation, contract, grant, or Rescue policy.
 - a. It shall not be necessary to be familiar with the exact law or requirement.
 - b. It shall not be necessary to be certain a violation has occurred or will occur.

What not to report through the Anonymous Ethics Reporting Line:

1. Emergencies shall not be reported through this line and shall be reported to 911.
2. This reporting service shall not be designed for employment concerns that are not legal or policy violations, are issues for which Rescue is not responsible, or that are initially viewed as likely to be resolved through normal agency channels (staff members shall see Appendix A of this policy and the Professional Behavior policy).

Confidentiality and good faith disclosures/reports:

1. Protected disclosures and reports shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and in accordance with applicable laws and regulations and Rescue policies and procedures.
2. Any individual making a protected disclosure concerning a suspected violation shall act in good faith and shall have reasonable grounds for believing the information disclosed indicates a violation. There shall be no retribution or discipline for anyone who reports a concern in good faith, even if the report is unsubstantiated.

How to use:

1. The Anonymous Ethics Reporting Line shall be available seven days a week, 24 hours a day, and 365 days a year.
2. Anyone may contact the Anonymous Ethics Reporting Line by calling the toll-free number or by filing a report through the reporting website (see Appendix B).
3. When calling to file a report, the reporter shall be greeted by a trained interviewer, employed by the reporting service company, who shall document concerns.
4. The more information provided, the more thorough the investigation shall be.
5. The reporter shall not be required to provide their name or any other personal information.
6. The call shall not be recorded.
7. A report number shall be assigned, which the reporter will need if they wish to call back or follow up through the reporting website.
8. The reporting service company shall then relay the information to Rescue's Compliance Officer, Chief Operating Officer, and the Chair of the Board of Directors, who shall consult with the appropriate Rescue department to investigate concerns.
 - a. Upon receiving a report, Rescue shall acknowledge receipt of the report and shall conduct an investigation, which shall be completed within 45 days of the receipt of the concern, unless more time is necessary to thoroughly investigate.
9. Using the toll-free number or reporting website, reporters may anonymously follow up or provide more information.
10. Upon completion of an investigation, Rescue shall take appropriate action, that may result in discipline, up to and including termination, as necessary.
11. The outcome of the investigation shall be communicated to the reporter via the Anonymous Ethics Reporting Line.

APPENDIX A

The following protocol for resolving staff member allegations of violations of business ethics, laws and regulations, and Rescue policies and procedures shall be followed by all staff members. The Anonymous Ethics Reporting Line can be used in lieu of, in addition to, or as an escalation of any step in the following protocol if the situation so warrants in the opinion of the staff member.

1. A staff member shall resolve concerns directly with the other staff member(s) in question.
2. If a resolution from step #1 cannot be made (i.e., the staff members cannot resolve the problem amongst themselves), the staff members shall jointly contact their direct supervisor(s) to intervene.
3. If a resolution from step #1 and/or step #2 is not feasible for any reason, the staff member making the allegation shall report the allegation to their supervisor without the other staff member(s) involved present.
4. A resolution by the supervisor shall be considered the final resolution.
5. If the complaint involves the staff member's supervisor, or if the supervisor does not respond to the allegation, the staff member shall contact one of the following leadership staff members listed below for direction and guidance. In the absence of a resolution from step #4, a resolution made by the appropriate leadership staff member listed below shall be considered the final resolution.
 - a. For employee relations matters: Chief Human Resources Officer;
 - b. For administrative/operational matters: Chief Operating Officer;
 - c. For financial matters: Chief Financial Officer;
 - d. For clinical matters: Clinical Director; and
 - e. For nursing matters: Director of Inpatient & Nursing Services.
6. If the Rescue leadership staff member(s) identified in step #5 is not responsive to the allegation, the staff member is invited to contact the Compliance Officer or the Chief Executive Officer for their intervention. In the absence of a resolution from step #5, a resolution made by the Compliance Officer or Chief Executive Officer shall be considered the final resolution.

Note: This protocol shall not be intended to limit the freedom of staff members to report concerns, but rather shall be intended to suggest a workable structure for resolving concerns in a professional office setting. Should following all steps in the above protocol fail for any reason, staff members still shall reserve the right to raise allegations consistent with collective bargaining agreements and applicable whistleblower laws. Any questions regarding this protocol shall be directed to the Compliance Officer.

APPENDIX B

How to file a report:

1. Call the toll-free phone number: 888-416-1308
2. Visit the reporting website: www.mycompliancereport.com
 - a. Use the following access code: UOFT