

SELFHELP COMMUNITY SERVICES, INC.		Policy #: 16
CORPORATE COMPLIANCE POLICY AND PROCEDURE MANUAL		Page 1 of 3
Subject: Compliance as an Element of Performance and Disciplinary Guidelines	Effective Date January 2006	Revision Date 03/2008, 10/2013 12/2015, 3/2018
Section: Corporate Compliance Education		

POLICY:

Selfhelp takes its compliance obligations very seriously. All personnel are informed that they have a responsibility to be knowledgeable about compliance with laws, regulations, and policies related to their job responsibilities and the following:

- 1) Reporting violations or questionable conduct.
- 2) Reporting fraud and abuse.
- 3) Compliance as a condition of employment, inclusion in the job description, and as a function of job performance.
- 4) Legal consequences of non-compliance.

Selfhelp is committed to enforcing this Program in a prompt manner, giving due consideration to issues of fairness and consistency. In cases of intentional or reckless noncompliance, sanctions could range from oral warnings to suspension, terminations, and/or financial penalties, and/or criminal prosecution as deemed appropriate.

PROCEDURE:

1. Employee compliance with the *Corporate Compliance Program* is an element in evaluating personnel job performance.
2. All personnel are given the *Corporate Compliance Plan and Code of Conduct & Ethical Behavior* within 30 days of hire.
3. Department directors are responsible for orienting employees to their job responsibilities and the related procedures to accomplish each task.
 - A) Managers are required to ensure and verify that personnel complete all mandatory in-service training assigned to the employee including compliance training at Selfhelp.

- B) Managers shall inform personnel that Selfhelp will take disciplinary action for violation of policies, procedures, and regulatory requirements, or for failure to complete mandatory training requirements.
 - C) Managers are responsible for informing personnel of compliance policies and procedures specifically related to their job function and appropriately monitoring personnel to help ensure adherence to those policies and procedures.
 - D) All personnel are informed that adherence to the laws, regulations, and policies are a condition of employment. Non-compliance may result in verbal warnings to suspension or termination.
4. Employee performance is evaluated on an ongoing basis and no less than annually, to ensure an employee's compliance with programmatic and corporate compliance policies and procedures as they relate to his/her specific job duties and responsibilities
5. Employees have an awareness of the organization's requirement that they comply with laws, regulations, and policies related to their job responsibilities and including:
- A) Reporting violations or questionable conduct.
 - B) Reporting fraud and abuse.
 - C) Compliance as a condition of employment, inclusion in the job description, and as a function of job performance.
 - D) Legal consequences of non-compliance.
6. In accordance with the *Code of Conduct & Ethical Behavior*, instances of non-adherence or misconduct can include, but not be limited to,:
- A) Violating any part of the *Code of Conduct*;
 - B) Violation of any policy within the corporate compliance program;
 - C) Violating programmatic policies;
 - D) Negligent, intentional, and/or malicious noncompliance;
 - E) Making of a bad faith report of non-compliance against another;
 - F) Participating in or authorizing an action that violates the compliance program;
 - G) Failing to report a known violation of the compliance program;

- H) Refusing to cooperate in the investigation of a suspected violation when requested;
 - I) Failing to detect or report a violation if such failure indicates inadequate supervision or lack of oversight by the violator's manager;
 - J) Failure of a responsible employee to detect (or report) a violation attributed to their negligence or reckless conduct.
7. For personnel who report their own illegal acts or improper conduct, such self-reporting will be taken into account in determining the appropriate disciplinary action. Complete disclosure will be considered a mitigating factor in determining discipline or sanction.
 8. In accordance with *Policy #11, Reporting Guidelines*, no employee who reports a suspected violation of the Code of Conduct, compliance policies, or who cooperates in an investigation of an alleged violation, who does not do so anonymously, will suffer any retaliation or reprisal for making the report or cooperating in an investigation.
 9. Each situation is considered on a case-by case basis to determine the most appropriate sanctions. This policy will be enforced across the organization, and consequences of non-compliance will be consistently applied and enforced, regardless of the position of the wrongdoer.
 10. Legal sanctions will be utilized as warranted by the severity of the non-compliance.