

SELFHELP COMMUNITY SERVICES, INC.		Policy #: 8
CORPORATE COMPLIANCE POLICY AND PROCEDURE MANUAL		Page 1 of 2
<b>Subject:</b> Directors and Managers Responsibility	<b>Effective Date</b> January 2006	<b>Revision Date</b> 03/2008 01/2014 8/2023
<b>Section:</b> Corporate Compliance Program Oversight		

**POLICY:**

Directors and Managers are responsible for ensuring adherence to the corporate compliance plan through the development of program policies and procedures that guide personnel (including contractors, subcontractors and consultants) in day-to-day operations and apply appropriate measures to ensure that personnel comply with those policies.

**PROCEDURE:**

1. The promotion of, and adherence to, the elements of the compliance program is a factor in evaluating the performance of all employees.
2. Directors and Managers serve as the first line of communication regarding compliance issues for employees. All employees are required and directed to report concerns, questions, and employee reports of suspected and/or prohibited activity immediately to their supervisor or directly to the Compliance Officer.
3. Directors and Managers are expected to:
  - A) Discuss with all employees under their supervision, as well as with relevant contractors and consultants, the compliance policies and requirements applicable to their function;
  - B) Inform all personnel that compliance with the organization's policies and procedures is a condition of employment;
  - C) Disclose to all personnel that failure to comply with, or to violate, organizational policies, procedures and the Code of Conduct may result in disciplinary action up to and including termination. Inform all personnel that Selfhelp Community Services, Inc. or any of its employees, will not retaliate

against any individual for good faith reporting of a suspected violation or questionable conduct or for cooperating in an investigation;

- D) Require that all personnel participate in all required training and in-services related to the organization's corporate compliance program at hire and thereafter, and validate that such required training has been completed;
  - E) Maintain policies and procedures that enable the Directors and Managers to confirm that functions under their supervision are implemented in compliance with law and that employees under their supervision perform their duties in compliance with these policies and procedures and applicable law.
4. Directors and Managers will be disciplined for failing to instruct their subordinates that a failure to detect noncompliance with applicable policies and legal requirements, where reasonable diligence would have led to the discovery of problems or violations, and afforded the organization the opportunity to resolve them earlier, and will subject the subordinate to disciplinary action, up to and including termination.
  5. Directors and Managers may be subject to discipline for failure to instruct employees they supervise that neglecting to report noncompliance that they become aware of will subject the subordinate to disciplinary action, up to and including termination.