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Administrative Manual
Section: Corporate Compliance
Policy Number: 1230

NON-RETALIATION FOR REPORTING

Objective: It is Covenant’s position that developing open lines of communication for its colleagues regarding compliance issues is key to maintaining an effective compliance program and increasing employee relations and morale. As a result, Covenant has developed this policy to encourage colleagues to report suspected violations, problems, concerns and opinions, including suspected violations of law, regulations, company policies and the Code of Conduct, on such issues without fear of retaliation or reprisal. This policy is intended to meet the requirement of the Office of Inspector General’s “Compliance Program Guidance for Hospitals”.

Scope: This policy applies to all colleagues working in any Covenant facilities and entities.

Policy: All colleagues, including supervisors and managers, are responsible for promptly reporting suspected wrongdoing, including a suspected violation of a law, regulation, policy, procedure, or of the Code of Conduct.

Colleagues who, in good faith, report a possible violation of law, regulation, policy, procedure or the Code of Conduct will not be subjected to retaliation, retribution or harassment. No colleague is permitted to engage in retaliation, retribution or any form of harassment against a colleague who reports compliance-related concerns. Any employee who conducts or condones retribution, retaliation or harassment in any way will be subject to discipline, up to and including termination of employment.

Colleagues cannot exempt themselves from the consequences of wrongdoing by reporting their own wrongdoing, although self-reporting may be taken into account in determining the appropriate course of action.

All colleagues, including supervisors and managers, are responsible for promptly reporting suspected retaliation, retribution or harassment to the Corporate Compliance Office.

Definitions:

1. Colleagues- Directors, Officers, Employees, Medical Staff, Volunteers, Suppliers, Vendors, Contractors, Consultants and Agents.
 2. Retaliation- Discipline, demotion, termination of employment or any other form of retribution or harassment because a colleague reported in good faith a suspected wrongdoing or other compliance concern.
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Provisions:

1. Colleagues should report all suspected wrongdoing or any other compliance concerns to their immediate supervisor. If for any reason, an employee is uncomfortable reporting suspected wrongdoing or any other compliance concerns to their supervisor, the employee should report the suspected wrongdoing or compliance concern to the Chief Compliance Officer, a staff member of the Corporate Compliance Office, or by phone or internet submission to the Compliance Hotline at 844.570.SAFE with code 010585, or www.SafeWhistle.com with code acL3Z6.
2. If any Manager, Director or Vice President has received a report of retaliation, retribution or harassment, the supervisor should immediately report the allegation to the Corporate Compliance Office.
3. Managers are instructed to take aggressive measures to assure their staff that Covenant truly encourages the reporting of compliance issues and that colleagues will not "get into trouble" for doing so.
4. It is critical that every colleague at Covenant understands that any incident where retaliation or reprisal can be related to an employee raising/reporting a compliance issue, either at the organization level or through the Compliance Program, will not be tolerated. Reports of this nature must be investigated thoroughly and expeditiously, with appropriate disciplinary actions taken, up to and including termination of employment.
5. Every report of a compliance concern will remain confidential at all times, insofar as legal and practical, will be shared only with those personnel who have a need to know.

EMPLOYEES WHO FEEL THEY ARE BEING RETALIATED AGAINST

1. Employee concerns regarding any issue of perceived retaliation should be reported to their immediate supervisor.
2. If for any reason, the employee is uncomfortable reporting perceived retaliation or any other compliance concerns to their supervisor, the employee should contact the Chief Compliance Officer, a staff member of the Corporate Compliance Office, or report by phone or internet

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SUPERVISORS WHO RECEIVE A COMPLAINT OF RETALIATION

1. Receive all colleague concerns, problems, and opinions and explore with the colleague suggestions for resolving the issue.
2. Inform the Chief Compliance Officer, the Corporate Compliance Office or report all compliance concerns and problems raised by colleagues (including any alleged retaliation) by phone or internet submission to the Compliance Hotline at 844.570.SAFE with code 010585, or www.SafeWhistle.com with code acL3Z6. .

HUMAN RESOURCE DEPARTMENT HANDLING OF RETALIATION COMPLAINTS

1. Keep the Corporate Compliance Office and Administration informed of all suspected compliance concerns and problems raised by colleagues including but not limited to retaliation, retribution or harassment for reporting.

References:

- Code of Conduct
- Deficit Reduction Act
- Whistleblower Policy

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Approved by:

Beth Charlton, Executive Vice President/COO

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