



**Series** Compliance

**Policy Name** **Non-Retribution/Non Retaliation Policy**

**Policy Number** 1507

**Origination Date** 11/1/2013;

**Revised:** July 1, 2018

**Regulation** N/A

**Policy:**

It is Communities Connected for Kids position that positive employee relations and morale can be best achieved and maintained in a working environment that promotes ongoing open communication between supervisors and their employees. This includes open and candid discussions of employee problems and concerns. (For the purpose this policy "supervisor" is defined as any employee who has supervisory or managerial responsibilities for one or more employees: i.e., director, manager, supervisor, etc.)

Communities Connected for Kids encourages its employees to express their problems, concerns and opinions on any issue. Toward that end, it is Communities Connected for Kids policy to provide a procedure through which employees can express problems, concerns, and opinions without fear of retaliation or reprisal. Human Resources policies provide an existing procedure "Positive Approach to Sharing Concerns/Suggestions" that also allows employees to express problems, concerns or opinions about conduct (e.g., non-harassment) or performance issues.

**Procedure:**

1. In order to ensure consistence and uniformity, it is important to provide supervisors with appropriate guidelines for addressing problems and concerns raised by employees.
2. It is recognized that one of the requirements of the U.S. Sentencing Commission's "Guidelines for Organizations" is that a company's corporate compliance program include a policy of non-retaliation/non-retribution for employees who report violations of law, regulations, company policies, and the Standards of Conduct.
3. All employees, including supervisors and managers, and independent contractors, are responsible for promptly reporting actual or potential wrong-doing, including actual or potential violations of law, regulation, policy, procedures, or Communities Connected for Kids Standards of Conduct.
4. A "Talk to Us" policy shall be maintained at all levels of management for employees and independent contractors to report problems and concerns. Procedures have been established to ensure that such reports are acted upon in an appropriate manner. If the problem is not satisfactorily resolved, the employee/independent contractor may proceed up the normal



reporting chain of command to a higher level. In addition, the existing Human Resources policy/procedure provides a formal procedure for reporting and responding to employee problems and concerns. The *Employee Compliance Helpline* is designed to permit any employee/independent contractor to call anonymously and in confidence to report problems and concerns or to seek clarification of compliance related issues.

5. Employees/independent contractors who report a possible violation of law, regulation, policy, procedure, or Communities Connected for Kids Standards of Conduct will not be subjected to disciplinary action or other forms of retaliation, retribution or harassment. No supervisor or employee/independent contractor is permitted to engage in retaliation, retribution or any form of harassment against an employee/independent contractor for reporting a compliance related concern. Any supervisors or employees/independent contractors who conduct or condone retribution, retaliation or harassment in any way will be subject to disciplinary action, up to and including termination of employment.
6. Employees 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.

Approved: Carol Deloach

Carol Deloach, Chief Executive Officer

July 1, 2018