**Compliance Program Policy & Procedure Template**

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| **SUBJECT**:  Compliance Hotline | **EFFECTIVE DATE**:  January 1st, 2014 | **REVISION DATE**: |
| **APPROVAL**: | **DATE**: |  |

**PURPOSE**: To provide employees and other individuals with a confidential avenue to report problems or concerns involving ethical or compliance violations.

**POLICY**: (“The Company”) shall maintain a Compliance Hotline that allows employees, or other individuals, to seek guidance or report a matter of concern.

**PROCEDURE**:

**1.** Employees and other individuals are provided the Compliance Hotline number at time of hire or contracting and are reminded a minimum of annually that it is their responsibility to report concerns involving ethical or compliance violations.

**2.** The hotline shall be made easily available for employees, contractors, agents and directors to access. Hotline numbers are prominently posted and available to all employees and contractors throughout the organization.

**3.** All calls to this Hotline can be made anonymously and without fear of intimidation or retaliation.

**4.** Employees and other individuals are encouraged to provide adequate information in order to assist with further investigation

**5.** The calls are not traced and the information is treated in a confidential manner, subject to the limits imposed by law.

**6.** All investigations will be handled confidentially.