**Compliance Program Policy & Procedure Template**

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| **SUBJECT**:  Non-Retaliation | **EFFECTIVE DATE**: | **REVISION DATE**: |
| **APPROVAL**: | **DATE**: |  |

**PURPOSE:**  (“the Company”) believes that it is essential for the Company to conduct business operations in full compliance with applicable laws and regulations and to comply with and enforce established policies and the Code of Business Ethics and Conduct. Any failure to comply with these laws, regulations, policies, and Code seriously threatens the business and reputation of the Company, shakes the confidence of the Company’s customers, employees, and other stakeholders, and is contrary to the Company’s purpose and obligations to the communities in which it does business.

Accordingly, the Company prohibits retaliation or retribution against an employee or other individual who, in good faith, reports a possible violation.

**POLICY**: All employees of the Company are responsible for promptly reporting, through proper channels, any activity which the employee believes, in good faith, may be a violation of a law, regulation, policy or the Standards of Conduct. This includes activities conducted by the employee.

In addition, each employee must cooperate with any investigation in connection with any alleged violation of policy, law, regulation, or Code. Further, the Company will not retaliate or bring retribution against any employee or other individual for reporting, in good faith, a possible violation or for participating in the investigation of an alleged violation. The term “other individual” refers to consultants, contractors, agency temporary employees, members, providers, vendors and producers and other entities with whom the Company does business.

It is the responsibility of employees to report any violation of which they may be aware and cooperate fully with any related investigation. To the extent possible, these actions will be considered mitigating circumstances in connection with corrective action taken against an employee based on his or her participation or involvement in the alleged violation.

Employees who fail to report known violations of applicable laws, regulations, policies or the Code, or who fail to cooperate with officials engaged in an investigation of possible violations, are subject to corrective action up to and including termination of employment or contract.

Any supervisor, manager, officer or other employee who retaliates against or brings retribution against an employee or other individual who reports a possible violation or cooperates in an investigation is also subject to corrective action up to and including termination of employment or contract.