

Compliance Policy, Guidelines & Procedures



Division: All HealthCare Partners Entities	Department Policy Owner: Compliance Department
Title: Non-Retaliation for Reporting Compliance Violations Policy	
Effective Date: February 2014	Issue Date: February 2014
	Revision Date: August 2014
Policy Number: HCP-TQ-03	Page: 1 of 3

Purpose	To comply with applicable federal and local laws prohibiting Retaliation, and to promote fair treatment to teammates who make good faith reports of potential violations of HealthCare Partners Code of Conduct, Compliance Policies and Procedures, or applicable laws and regulations.
Definitions	<ul style="list-style-type: none"> • Good Faith: Truthful, and without malice or ill intent. A teammate who files a good faith complaint believes that a violation has occurred based on a reasonable inquiry or facts. • Retaliation: Adverse action such as intimidation, threats, coercion, or discrimination against an individual.
Policy	<ol style="list-style-type: none"> 1. HealthCare Partners will not retaliate against any teammate who: <ol style="list-style-type: none"> a. Discloses, or threatens to disclose, information about a situation they feel is in violation of HealthCare Partners' Compliance Policies and Procedures or federal, state, or local law; b. Provides information to HealthCare Partners or an external agency or testifies against the alleged offending individual or HealthCare Partners; c. Objects to, or refuses to participate in, an activity they feel is in violation of federal and/or state law, HealthCare Partners' policy, or accreditation requirements; or d. Is involved in any compliance review or peer review process. 2. HealthCare Partners does not tolerate any form of Retaliation against anyone who makes a report in Good Faith. 3. All teammates, as a condition of employment, are responsible for promptly reporting misconduct, including actual or potential violations of law, regulation, policy and procedures, or the Code of Conduct, and may do so without fear of Retaliation or disciplinary action for reporting. 4. Any disclosures will remain confidential to the extent practical, and to the extent that the law allows. All reports of noncompliance are taken seriously and will be investigated. 5. Teammates found to have retaliated against another teammate will be disciplined up to and including termination of employment.

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Responsible Party	Procedures
All Teammates	<p>1. Teammates who believe they are the subject of Retaliation, for reporting an actual or suspected violation of law or HealthCare Partners' policy, should immediately report the suspected Retaliation to:</p> <ul style="list-style-type: none"> a. Your supervisor b. Human Resources (People Services) c. Vice President of Compliance or the Compliance Department (Team Quest) at CorporateCompliance@healthcarepartners.com d. HCP's Compliance Hotline at 1.855.236.1448, or www.healthcarepartners.ethicspoint.com e. Corporate Legal Department
All Supervisors	<p>2. Supervisors must act to ensure support of this policy and encourage the reporting of problems and concerns. At a minimum, the following actions should be taken by managers:</p> <ul style="list-style-type: none"> a. Review the policy with teammates; b. Maintain an environment that encourages teammates to communicate their concerns directly.
Team Quest and People Services Personnel	<p>3. Team Quest, will coordinate with the People Services, to investigate and follow-up of any reported Retaliation against a teammate.</p>

Teammates are expected to report possible violations of this policy and procedure. You may make your report to your supervisor, to the Compliance Hotline (1-855-236-1448 or www.healthcarepartners.ethicspoint.com) or to Team Quest. HealthCare Partners has a Non-Retaliation policy and will not tolerate any form of retaliation against anyone who files a Compliance report in good faith. Reports can be made anonymously or you may request confidentiality. Questions regarding this policy should be directed to Team Quest at CorporateCompliance@healthcarepartners.com.

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