



<b>Policy Name:</b>	<b>Corporate Compliance Program (Whistleblower Policy)</b>
<b>Policy Code:</b>	<b>001</b>
<b>Policy Purpose:</b>	Rise requires its employees and volunteers, including its Board and committee members, to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the organization, it is important to comply with all applicable laws and regulatory requirements. This policy establishes Rise’s policy regarding the corporate compliance program.

**1. Reporting Responsibility**

Rise is dedicated to the operation of programs and services that conform with the highest standards of accountability of administration, business, marketing, and financial management. Rise’s leadership is fully committed to the need to prevent and detect fraud, fiscal mismanagement, and misappropriation of funds. Rise has an “Open Door” policy and encourages everyone to share their concerns, and complaints regarding Rise and its operations with the appropriate leadership team member. A board member or board committee member should present his or her concerns to the Chair of the Board. A team member or volunteer should present his or her concerns to the Rise Corporate Compliance Officer, or Rise President/CEO. However, if a board member is not comfortable speaking with the Chair of the Board or is not comfortable with the Chair of the Board’s response, or if a team member or volunteer is not comfortable speaking with the Corporate Compliance Officer or President/CEO, or is not satisfied with their response, the Board member, employee, or volunteer is encouraged to speak with anyone on the Board whom the individual is comfortable in approaching.

**2. Requirement of Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of Rise’s policies, or any laws or regulation requirements, must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

**3. No Retaliation**

No individual who in good faith reports a violation shall suffer harassment, retaliation, or any adverse employment consequence. Any individual who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or volunteer status. This Corporate Compliance Policy is intended to encourage and enable all individuals to report violations and concerns within Rise to the organization’s leadership prior to seeking resolution outside the organization.

#### **4. Compliance Officer**

The Vice President of Human Resources, working with the President/CEO, will act as the organization's Compliance Officer. The Compliance Officer is responsible for investigating and resolving complaints and allegations concerning violations of all applicable laws and regulations, including Rise's bylaws and/or Code of Conduct. The Board Chair, or the Chair's designee, will take on the Compliance Officer role if the complaint involves any member of Senior Leadership. If the complaint involves both the President/CEO and Board Chair, the Vice Chair will carry out the functions of the Compliance Officer.

#### **5. Accounting and Auditing Matters**

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding the Organization's accounting practices, internal controls, or auditing. The Compliance Officer shall immediately notify the Finance Committee of any such complaint and work with the Committee until the matter is resolved.

#### **6. Confidentiality**

Violations or suspected violations may be submitted anonymously or on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

#### **7. Handling of Reported Violations**

The Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

#### **8. Federally Funded Healthcare List of Excluded Individuals**

Rise reviews all new hires and Board directors to assure they are not on the list of Excluded Individuals (LEIE) that is maintained by the Office of the Inspector General in order to assure none of our team members or directors are on the list. Any employee or director whose name is on the list would be excluded from serving on the board or being employed by the organization.