	Policy + Procedure Title	Document Number	CC.P+P.001.06
	Internal Reporting Obligations and Investigations Policy	Revision Level	6
	Policy + Procedure Owner	Revision / Effective Date	11/2022
	Chief Compliance Officer	Policy + Procedure Approver	Chief Executive Officer

Purpose/Scope

As part of Centria’s Compliance Program, every employee is required and has the affirmative duty to internally report any observed or potential violations of the law, regulations, or Centria’s Code of Conduct through the designated internal Compliance Program channels. As an employee of Centria you are expected and required as a condition of your employment to follow these reporting protocols. Centria has a policy that prohibits any retaliation against an individual who makes an internal report to the Compliance Program in good faith. Failure to internally report potential violations can lead to disciplinary action, including but not limited to, termination of employment.

Responsibility

All Centria employees and business associates.

Policy


The following are examples (not an exhaustive list) of situations that you would be required to internally report to the Compliance Program if you had specific knowledge or awareness of a potential violation:

- An employee billing for services when they did not provide them;
- An employee misrepresenting the services that were provided;
- Any suspected physical, verbal, or emotional abuse or exploitation of a client by an employee;
- Falsification of service or payroll documentation;
- Theft of company property or materials, including anything that is considered confidential information;
- Harassment or discrimination of an employee or client by another Centria employee;
- Inappropriate conduct in the workplace that violates Centria’s Code of Conduct;
- Recipient Right’s issue or violation (Michigan Medicaid clients);
- Notice of a government or outside agency investigation or inquiry;
- Threat of a lawsuit against Centria or one of its employees;
- Any event likely to cause significant reputational or financial harm to Centria;
- Any other violation of a legal, regulatory or contractual requirement by an employee while on duty.

It is imperative that you immediately make an internal report when required so that Centria can undertake a comprehensive internal review of the matter and take appropriate corrective action depending on the results of any investigation. This is a job requirement for **all Centria Employees**. Employees should not attempt to handle any suspected compliance issues on their own, including conducting their own investigation surrounding the issue or discussing an allegation with anyone other than the Compliance Team. Centria will treat all internal reports to the Compliance Program confidentially to the extent reasonably possible.

Outside Agencies

Employees may exercise their rights to directly contact any regulatory authority, government agency, accrediting body, law enforcement, or other enforcement entity to report potential violations under applicable law(s). This policy is not intended or should not be construed to restrict, discourage, or interfere with communications or actions that are

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protected or required by state or federal laws or regulations. However, employees are required to report these matters through the internal escalation procedure as well.

Procedure

1. Internal Report is initiated.

There are several available options to make an internal report:

- Directly and confidentially email the Corporate Compliance Team:
corporatecompliance@centriahealthcare.com
- Submit a report form through Centria’s website:
<https://www.centriahealthcare.com/submit-a-complaint-or-violation>
- Call the toll-free, third party Centria Compliance Hotline: **(866) 842-7126**
You can choose to give your name or remain anonymous if you prefer.
- Send a written complaint via mail addressed as follows:
Centria Health Care, LLC. - Attention: Corporate Compliance Department
27777 Inkster Rd., Suite 100
Farmington Hills, MI 48334

2. Report is reviewed/investigated.

All potential compliance issues will be reviewed by the Chief Compliance Officer unless the issue specifically names and involves the Chief Compliance Officer. Issues that involve the Chief Compliance Officer will be handled by the Chief Executive Officer and/or outside counsel.

- 2.1.** The Compliance Team gathers and reviews all relevant information. The Compliance Team will speak with individuals who may have knowledge of the reported matter. Any information requested as part of the review must be submitted in a timely manner.
- 2.2.** During the review process, employees are not to discuss any information under review with anyone other than the Compliance Team unless directed to do so by the Compliance Team.
- 2.3.** When conducting an internal investigation, the Compliance Team may seek the assistance and guidance of experienced legal counsel.

3. Review and investigation (as applicable) are completed.

Once the review is complete, the Compliance Team will notify the necessary individuals of the outcome and take appropriate follow-up action. Due to confidentiality laws and regulations that protect certain types of information, the Corporate Compliance Department may not be at liberty to discuss details with individuals who made the report or were involved in the investigation of the report. However, the Compliance Team can communicate whether the issue is under investigation, open, or closed.