	Policy + Procedure Title	Document Number	CC.P+P.001.04
	Internal Reporting Obligations, Investigations, General Communications	Revision Level	4
	Policy + Procedure Owner Chief Compliance Officer	Revision / Effective Date	01/2021
		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 potential violations of the law, regulations, or other compliance related concerns that they are aware of through the appropriate internal Compliance Program channels. As an employee of Centria you are expected and required as a condition of your employment to follow these protocols. Failure to internally report potential violations can lead to disciplinary action, including but not limited to, termination. Centria has a policy of non-retaliation for making internal reports. Specifically, retaliation against an employee for making a good faith internal compliance report is strictly prohibited.

Responsibility


All Centria Healthcare employees.

Policy

The following are examples of situations (not an exhaustive list) that you would be required to internally report if you had specific knowledge of:

- An employee billing for services when they did not provide them
- An employee misrepresenting services provided
- Any suspected physical, verbal, or mental abuse of a client or another employee by an employee
- Falsification of documentation
- Theft of company property and material, including anything that is considered confidential information
- Inappropriate conduct in the workplace
- Notice of a government or outside agency investigation or inquiry
- Any violation of a law, regulatory or contractual requirement by an employee while on duty
- Any event likely to cause significant reputational or financial harm to Centria
- Threat of a lawsuit
- Harassment or discrimination of an employee or client
- Recipient Rights issue or violation
- Any person threatening or making claims of being subject to or a party to any of the above

It is imperative that you make an internal report when required so that Centria can undertake a comprehensive internal investigation of the matter and take appropriate corrective action depending on the results of the investigation. This is a job requirement for all Centria Employees. Failure to report a potential compliance violation could result in disciplinary action. Employees should not attempt to handle any suspected compliance issues on their own, including conducting their own investigation surrounding the allegation or discussing the allegation with anyone other than the Compliance Staff, as detailed in the procedure below. In conducting an internal investigation, Centria may also seek the assistance and guidance of experienced legal counsel. Centria will treat all internal reports confidentially to the extent reasonably possible.

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Outside Agencies

Employees may exercise their rights to directly contact any regulatory authority, government agency or entity, report possible violations of law, or make other disclosures under applicable laws. This policy is not intended or should not be construed to restrict, discourage, or interfere with communications or actions protected or required by state or federal laws or regulations. However, it is 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:

- Email the Corporate Compliance Department, checked by the Compliance Team:
corporatecompliance@centriahealthcare.com
- Contact Centria’s Chief Compliance Officer - Jeff Felty:
(855) 772-8847; or
jeff.felty@centriahealthcare.com
- 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: Compliance Officer
27777 Inkster Rd., Suite 100
Farmington Hills, MI 48334

2. Report is reviewed.


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. Employee safeguards information.

During the review process, employees are not to discuss information with anyone other than the Compliance Team.

2.2. Compliance gathers and reviews all relevant information.

Compliance will speak with all individuals as needed. Notification to impacted departments will be made, as determined by the Chief Compliance Officer. Any information requested as part of the review must be submitted in a timely manner.

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3. Review is complete.

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