

KING'S DAUGHTERS MEDICAL CENTER

**AUDIT, COMPLIANCE &
ETHICS PROGRAM POLICY**

POLICY AND PROCEDURE

**EFFECTIVE DATE:
DECEMBER 17 , 2013**

**SUPERSEDES POLICY DATED:
7/1/12**

FILE: SECTION A (9)

**SUBJECT: NON RETALIATION
POLICY**

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- * **POLICY:** The Medical Center is committed to preventing, detecting and correcting fraud, waste and abuse and as such the Medical Center encourages team members to bring forward information of perceived or actual violations of the Code of Conduct or any compliance issue. All team members have a responsibility to create a work environment where concerns can be raised, openly discussed and reported without fear of retaliation.

The Medical Center shall take all necessary steps to refrain from intimidating, threatening, coercing, discriminating against, or taking any other retaliatory action against any employee for exercising any right under, or for participating in any process established by applicable law, regulation, or existing policies and procedures.

PROCEDURES:

- * 1. **Reporting.** All team members have an affirmative duty to promptly report actual or potential wrongdoing, including an actual or potential violation of law, the Code of Conduct, fraud, waste or abuse laws or any compliance issue. The confidentiality of team member concerns and problems will be respected and protected at all times, insofar as legal and practical, informing only those who have a need to know.
- * 2. **Non-Retaliation.** The Medical Center maintains an open-door policy for team members to report problems and concerns. Retaliation against any individual who, in good faith, reports or who participates in the investigation of alleged violations is strictly forbidden. This policy does not protect an individual who files a report or provides information as part of an investigation that he or she knows is false, files a bad faith retaliation claim or participates in illegal conduct.

- * 3. Retaliatory Conduct. A team member with a concern regarding retaliatory conduct should promptly report any claims of retaliation to his or her supervisor or through the appropriate management chain of command. If the supervisor or management in the chain of command is unavailable or the employee believes it would be inappropriate to conduct them, the team member should immediately contact Human Resources.

Vice President/Chief Legal and Regulatory Officer