


Title: ADM 04 CORPORATE COMPLIANCE INVESTIGATION AND RESPONSE

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I. Policy Objective

Gateway Foundation, Inc. (Gateway) has a Corporate Compliance Program that is designed to promote an ethical organizational culture through oversight, prevention and early detection of wrongdoing. Gateway's Corporate Compliance Program encourages the reporting of potential or actual violations, in order to ensure early detection and prompt correction of any behavior or activity considered to be unethical, illegal or contrary to established policy, procedure or standard of conduct. The Gateway Corporate Compliance Officer, either directly or through his or her designee, leads investigations into concerns, allegations or inquiries received, and shall include issues related to laws, regulatory compliance, privacy, discrimination in the treatment program, the Code of Conduct, accounting, internal controls or auditing matters, and ethical conduct.

II. Scope

All Gateway and affiliate programs.

III. Process

1. Gateway's Corporate Compliance Program provides a mechanism of reporting to ensure swift and proper response when the Compliance Officer or third party hotline mechanism receives a reported concern, allegation or inquiry.
2. Investigations

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- 2.1.** Upon receipt of a report from any source, including an employee, client or other party alleging an incident of non-compliance or suspected incident of noncompliance, the Compliance Officer, or his or her designee, will either initiate an internal investigation or triage the issue to the appropriate business area for further review and response.
- 2.1.1.** If a reporter believes the Compliance Officer has a conflict of interest or would not be objective in a specific investigation, the reporter should contact Gateway's President and CEO. The President and CEO will determine whether a conflict of interest exists, and if so, will appoint another person to investigate and respond to the allegations.
- 2.1.2.** If the conduct in question involves the President and CEO or an allegation of collusion between the President and Compliance Officer, and has criminal implications, the matter shall be referred to Gateway's General Counsel and the Audit Committee of the Board of Directors for involvement in the investigation. Contact information for the Audit Committee Board Chairperson can be requested from Gateway's Administrative Office Manager.
- 2.2.** The purpose of the compliance investigation will be to determine if the alleged incident occurred, to assess the impact of an actual violation, to identify individuals who may have knowingly or inadvertently caused violations, to recommend changes to any practices, to recommend implementation of procedures necessary to ensure future compliance, and to protect Gateway in the event of civil or criminal enforcement actions.
- 2.3.** The Compliance Officer or person leading the investigation will only share information about the investigation with those persons he/she believes "need to know" or who may assist in the investigation or the corrective action, or as directed by Gateway's General Counsel. The Compliance Officer or person leading the

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investigation will acknowledge receipt and communicate with the reporter as necessary.

2.4. The Compliance Officer will determine the extent and breadth of the investigation required, depending upon the nature and impact of any potential violations.

2.5. The Compliance Officer will engage Gateway's General Counsel and Human Resources Director to consult on the direction of an investigation. The applicable business area executives will be engaged in the investigative process.

2.6 If the internal investigation finds the alleged conduct is not considered to be a violation, or that the conduct did not occur as alleged, or that it does not otherwise appear to be a problem, the Compliance Officer will designate the case as unsubstantiated.

2.7. The Compliance Officer will coordinate with Human Resources to engage the appropriate manager to initiate any action in response to a substantiated compliance violation. The precise corrective or disciplinary action employed will be determined by Human Resources and Gateway management, and may result in any one or more of the actions set forth in [HR 244 CORRECTIVE ACTION](#) or [ADM 21 Confidential and Protected Health Information Sanctions Guidelines](#). Additional training or education may be provided to reduce the potential for similar issues in the future. A compliance action plan or revision to a policy or procedure may be recommended before a compliance investigation is considered closed.

2.8 The Compliance Officer will provide input regarding communication or reporting to appropriate regulatory and licensing bodies as case findings require and in coordination with Gateway's General Counsel.

2.9 The Compliance Officer will submit periodic reports to the Audit Committee of the Board of Directors of all concerns, allegations and inquiries in accordance with the guidelines set forth in the Charter of the Audit Committee of the Board of Directors

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(the "Charter") received and investigated by the Corporate Compliance Program. Reports will be provided on a quarterly bases or such other timeframe as stipulated by the Charter.

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