

	Document Owner: MARLA BERKOW	Last Approved Date: 04/27/2017
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I. Policy

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 (“misconduct”). Each Gateway employee has a responsibility to report suspected or known instances of misconduct, as it may relate to the Gateway organization, our clients, payers, vendors and workers.

II. Scope

All Gateway Programs and Departments

III. Process

1. Gateway’s Corporate Compliance Program investigates issues of misconduct related to regulatory compliance, privacy, discrimination in the treatment program, and ethical conduct.
2. Under no circumstances is misconduct by any employee considered within the scope of his or her employment or authority. Gateway has implemented a Corporate Compliance Program, which is an integral part of the Code of Conduct (see Employee Guide).
 - 2.1. All employees have a duty to promptly report any actual, apparent or planned work-related activity that is committed by another employee, contractor, subcontractor or agent, which may be considered misconduct. This includes any solicitation to participate in any potentially illegal or unethical activity.
 - 2.2. If an employee knows, or reasonably believes, that an employee, contractor or agent has committed or is about to engage in misconduct, he/she must report it to his/her supervisor and the

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Gateway Compliance Officer within 24 hours. The employee shall provide some evidence, preferably in writing, of the activity or potential activity, if available.

- 2.3.** If an employee believes it would be inappropriate to discuss the matter with his or her supervisor, then the matter should be reported directly to the next higher level of supervision or the Compliance Officer.
- 2.4.** If an employee perceives the Compliance Officer as having a conflict of interest, the employee should contact the President. The President shall determine whether a conflict of interest exists, and if so, appoint another person to respond to and investigate the report.
- 2.5.** Any employee who fails to report actual or potential violations as described above will face appropriate corrective action.
- 2.6.** The Compliance Officer may be contacted by:
 - 2.6.1.** Telephone direct at (800) 777-1833 x2313 or the Compliance Hotline at (800) 457-2598; or
 - 2.6.2.** In writing at 55 E. Jackson, Suite 1500, Chicago, IL 60604; or
 - 2.6.3.** In person at 55 E. Jackson, Suite 1500; or
 - 2.6.4.** Email, to compliance@gatewayfoundation.org "Compliance Officer" in the company email address book; or
 - 2.6.5.** <http://gatewayfoundation.ethicspoint.com>
- 2.7.** Anonymous reporting shall be treated as seriously and fully as those filed or communicated by individuals who identify themselves.
- 2.8.** An investigation of all alleged misconduct will be conducted in accordance with policy ADM 04 Corporate Investigation and Response Policy.
- 2.9.** To the extent allowed by law, efforts shall be made to preserve the confidentiality of the reporting employee's identity. The Compliance Officer will have authority to release identifying information to:
 - 2.9.1.** Gateway Managers and Officers who are not the subject of the report and may be involved in the investigatory process;
 - 2.9.2.** Legal counsel;
 - 2.9.3.** The appropriate Board Committee, if applicable;
 - 2.9.4.** Law enforcement officials, if criminal charges are being filed by Gateway against an employee.
 - 2.9.5.** The Compliance Officer may disclose contents of a report to such individuals who, in the opinion of the Compliance Officer, need the information to assist in the investigation, response, or corrective action.
 - 2.9.6.** No retaliation will be tolerated against any employee who has filed a report based on good faith belief that another

employee or agent has engaged in misconduct or any employee who has cooperated in the investigation of a report.

- 2.9.7.** Any employee who attempts to take or takes retaliatory action against an employee reporting in good faith an actual or suspected misconduct will face corrective action.
- 2.9.8.** Any employee who deliberately makes a false accusation with the purpose of harming another employee will face appropriate disciplinary action.
- 2.9.9.** Any employee who refuses to cooperate in the investigation of suspected or known misconduct will face appropriate corrective action as set forth in policy HR 244 Corrective Action.

IV. Related Documents

- 1. [ADM 04 CORPORATE COMPLIANCE INVESTIGATION AND RESPONSE](#)
- 2. [Corporate Compliance Plan Overview](#)
- 3. **Employee Guide (Attached)**
- 4. [HR 244 CORRECTIVE ACTION](#)
- 5. [Compliance SOP 01 EthicsPoint Entry and Review](#)

