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| RESPONSIBLE DEPARTMENT: Corporate Compliance | |
| POLICY DESCRIPTION: Non-Retaliation | |
| SUPERSEDES: | PAGE: 1 of 3 |
| EFFECTIVE DATE: 2016 11 16 | POLICY NUMBER: |

PURPOSE: The purpose of this policy is to encourage members to the Shriners Hospitals for Children® (“SHC”) community to report compliance and ethics concerns or to seek guidance on compliance and ethics concerns. This policy reinforces that SHC prohibits retaliation against those individuals who report or seek guidance on possible ethical or compliance issues in good faith.

DEFINITIONS:

Good faith: An individual has an honest belief that the information provided in support of a compliance or ethics concern is truthful based on the existing information.

Retaliation: Any action, statement, or behavior that is designed to punish a workforce member for filing a compliance report, cooperating with an investigation, seeking guidance regarding a compliance concern or to deter another workforce member from taking such action. Retaliation includes, but is not limited to, intimidation, harassment, mistreatment, or adverse actions against a workforce member regarding the terms of their employment or participation with SHC, as well as related threats of such actions.

Workforce member: A member of the Boards of Directors and Trustees and Board of Governors, employees, volunteers, contractors, subcontractors, consultants, medical staff members, medical and other students, affiliate scientific and research staff, interns, residents, fellows, and allied health providers who provide services to patients.

POLICY:

(a) SHC is committed to operating with integrity in compliance with applicable laws, regulations and policies. SHC expects the highest standards of ethical conduct from its workforce members and is committed to protecting both its mission and reputation.

(b) SHC expects its workforce members to report compliance concerns. Those who have concerns of any kind stemming from possible noncompliance with federal, state, or local laws or regulations, SHC policies, errors or irregularities in SHC’s financial accounting practices or policies are expected to report these concerns promptly.



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| SUPERSEDES: | PAGE: 2 of 3 |
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(c) Workforce members are prohibited from retaliation against anyone who files a compliance report, cooperates with an investigation, or seeks guidance on a compliance concern in good faith, even if SHC ultimately concludes there was no violation.

(d) This policy also protects participants in an internal SHC investigation when the participants act in good faith. A person is not acting in good faith under this policy if the person reports a compliance concern or makes statements during an investigation that are knowingly false or that involve willful disregard or purposeful ignorance of the facts surrounding an allegation of a compliance violation.

(e) Individuals who believe that they have been subject to retaliation prohibited by this policy should promptly contact the Corporate Compliance Department or the Compliance Hotline. The Compliance Hotline may be contacted at (866) 290-7637 or www.shriners.ethicspoint.com.

(f) Allegations of retaliation will be promptly investigated. A workforce member who is found to have retaliated against another individual or entity in violation of this policy shall be subject to disciplinary action up to and including termination of employment or affiliation with SHC. The workforce member may also be subject to criminal and civil liability under federal and state laws and the laws of other countries.

(g) A workforce member who fails to act in good faith in connection with reporting a compliance concern or in cooperating with an investigation regarding a compliance concern shall be subject to disciplinary action up to and including termination of employment or affiliation with SHC.

(h) An adverse personnel or other disciplinary action against a workforce member whose conduct or performance warrants such action for reasons unrelated to the reporting of a compliance concern does not constitute a violation of this policy.

(i) The Corporate Compliance Department has general responsibility for the enforcement of this policy.



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| SUPERSEDES: | PAGE: 3 of 3 |
| EFFECTIVE DATE: 2016 11 16 | POLICY NUMBER: |

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| <p>REFERENCES:</p> <ul style="list-style-type: none">- Section 503.9(a) and (b) of the SHC Articles of Incorporation and Bylaws- Section 101.2(a) and (b) of the SHC Code of Ethics- Sections 3.1, 3.2, 6.1, 6.17 of the SHC Employee Handbook- Federal Sentencing Guidelines for Organizations, Guidelines Manual, Section 8B2.1(b)(5)(C)- HIPAA Administrative Simplification Final Rule, 45 CFR 160.316- Federal False Claims Act, 31 USC 3730(h)(1) |
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HELP: For questions regarding this policy, contact the Policy and Procedures Coordinator at Shriners Hospitals for Children International Headquarters in Tampa, Florida (813-281-8671).

Approved by Joint Boards: 2016 11 16