



PURPOSE:

To promote conducting business honestly and in compliance with applicable laws and regulations and to detail available methods for reporting Wrongful Conduct.

POLICY STATEMENT(S):

The Workforce is required to report actual or suspected Wrongful Conduct. Anyone who makes a Good Faith report of suspected Wrongful Conduct will not be subjected to Retaliation for the act of reporting. Reports should be made to a supervisor, a member of the Bristol Health Compliance Office, a member of the Bristol Health Human Resources Department or other appropriate personnel. Reports can also be made to the Bristol Health Compliance Hotline (Hotline). Anyone who makes a report may request to be anonymous. In such cases, the reporter's identity will not be revealed unless disclosure is required by law, subpoena, or other legal process.

The Workforce cannot exempt themselves from the consequences of personal wrongdoing by reporting their own misconduct.

Any communication that proves to have been both unsubstantiated and made with malice or with knowledge that it was false is not protected by this policy. This policy also protects individuals from false allegations of Wrongful Conduct.

Anyone who conducts or condones Retaliation in response to a Good Faith report of suspected Wrongful Conduct will be subject to disciplinary action, up to and including termination.

DEFINITIONS:

For the purposes of this Policy, the following definitions shall apply:

Bristol Health: Includes Bristol Hospital, the Bristol Hospital Development Foundation, Bristol Health Medical Group, Bristol Health Emergency Medical Services (EMS), Bristol Health Home Care & Hospice and Bristol Health Ingraham Manor.

Good Faith Report: Reporting with the reasonable belief that it is true.

Retaliation: An adverse action taken because an individual has acted in Good Faith to make a report or participated in or with an institutional investigation, proceeding, or inquiry regarding a report and includes actions which would dissuade a reasonable person from making a report such as discharge, discipline, penalty, demotion, suspension, harassment, or any manner of discrimination against an individual, or any threat of the above. Retaliation negatively impacts significant terms of employment (e.g. salary, demotion, termination, unjustified negative evaluations or other adverse employment or personnel actions, and non- reappointment) and conditions (e.g. harassment and hostile working environments).

Workforce: Refers to all persons actively involved in accomplishing the work of Bristol Health including, but not limited to: employees, contracted individuals and volunteers.

Wrongful Conduct: A violation of Bristol Health policy or Code of Conduct; a violation of applicable

state and/or federal laws; the inappropriate use of Bristol Health property, resources, or authority for personal gain or other non-Bristol Health related purpose except as provided under Bristol Health policy; or Retaliation against someone for making a Good Faith Report of suspected Wrongful Conduct.

SCOPE:

Organization-wide

PROCEDURE:

Anyone making a report of Wrongful Conduct must be acting in Good Faith and have reasonable grounds for believing the information reported indicates potential Wrongful Conduct.

Anyone who knowingly or with reckless disregard for the truth gives false information or knowingly makes a false report of Wrongful Conduct or a subsequent false report of Retaliation will be subject to disciplinary action, up to and including termination. Allegations that are not substantiated and are made in Good Faith are not subject to corrective action.

Retaliation against an individual who makes a Good Faith report will not be tolerated. Any person who retaliates against any individual who makes such a report is subject to discipline up to and including termination. This policy is intended to enable the Workforce to raise serious concerns within Bristol Health without fear of Retaliation.

Reports may be made on a confidential basis by reporting anonymously through the Hotline at 1-844-361-0775 or <https://bristolhealth.ethicspoint.com>. Reports and investigation records will be kept confidential to the extent possible.

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the results of the investigation in accordance with the Corrective Action – Rules of Conduct policy.

Compliance with policy requirements is subject to regulatory flexibility when applicable.

MISCELLANEOUS:

This policy may be revised, supplemented, or rescinded at any time as Bristol Health deems appropriate in its sole and absolute discretion, without prior notice. This policy (and any other policy) does not constitute a contract of employment and does not in any way limit or modify employees' at-will employment status.

RELATED POLICIES:

Code of Conduct

Corrective Action – Rules of Conduct

C-02 Compliance Program

C-03 Compliance Hotline Response

C-07 Preventing Fraud, Waste and Abuse

C-11 Internal Investigations