

Whistle Blower Policy (Non-Retaliation/Non-Intimidation)

Updates Approved by Compliance Committee: 9.6.2023; 9.4.2024

Reviewed w/ No Changes: 9.3.2025

Revised: 7.6.2024 (added webpage)

Purpose:

Cayuga Health System's (CHS) Code of Conduct requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of CHS, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Policy:

Reporting Responsibility

It is the responsibility of all directors, officers, and employees to comply with the Code of Conduct and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer, employee or affected individual who in good faith reports a violation of the Code of Conduct shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within CHS prior to seeking resolution outside of CHS.

Reporting Violations

The Code of Conduct addresses CHS's open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with someone in the Human Resources Department or anyone in management whom you are comfortable in approaching.

Supervisors and managers are required to report suspected violations of the Code of Conduct to CHS's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following CHS's open door policy, individuals should contact the Compliance Officer directly.

Compliance Officer

CHS's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violation of the Code of Conduct and, at his/her discretion, shall advise the Compliance Director and/or the Compliance Committee. The Compliance Officer has access to the Board of Directors and is required to report to the Board at least annually on compliance activity. CHS's Compliance Officer is the chair of the Compliance Committee.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code of Conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicated a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously via the compliance hotline (607-274-4170) or via an anonymous report on the

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cayugahealth.org/about/corporate-compliance webpage. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within 5 business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.