

**The Arc Madison Cortland
Corporate Compliance Plan**

**Reporting Compliance Concerns/Whistleblower/
Anti-Retaliation & Non-Intimidation Policy**

Date of First Issue: January 2015

**Revision Date(s): January 2017,
March 2025**

I. POLICY

Strict adherence to The Arc Madison Cortland's Corporate Compliance Plan and Standards of Conduct is vital. The Arc requires all employees, directors, officers and volunteers to promptly report any known or suspected violations of the Corporate Compliance Plan, Standards of Conduct, policies and procedures or any of the laws, rules or regulations by which the Arc is governed. This Policy governs the procedure to be used by employees, directors, officers and volunteers to report compliance concerns and seeks to ensure that the Arc provides an environment that encourages individuals to report any suspected violations without fear of retaliation or retribution.

II. RESPONSIBLE PARTY

This Policy applies to all employees, directors, officers, vendors, and volunteers of The Arc Madison Cortland. This policy must be distributed to all directors, officers, employees and volunteers who provide substantial services to The Arc. Distribution may be satisfied through posting of this policy to The Arc's website or at the corporate offices in a conspicuous location available to employees and volunteers. The Board oversees implementation of and compliance with this policy.

III. PROCEDURE

Duty to Report

Employees, directors, officers, vendors, and volunteers are required to report any known or suspected violations of the Corporate Compliance Plan, Standards of Conduct, policies and procedures or any of the laws, rules or regulations by which The Arc Madison Cortland is governed to their supervisor, manager, the Corporate Compliance Officer or through The Arc Madison Cortland's Compliance Hotline.

Reporting through The Arc Madison Cortland's Compliance Hotline

Employees, directors, officers, vendors, and volunteers may report their compliance concerns confidentially to The Arc Madison Cortland's Compliance Hotline. The Compliance Hotline telephone number is 1-800-401-8004. Hotline reports can also be submitted via website: <http://www.lighthouse-services.com/madisoncortlandarc>. Callers to the Compliance Hotline may make reports anonymously. No caller will be required to disclose his or her identity and no attempt

will be made to trace the source of the call or identity of the caller when the caller requests anonymity.

If a caller has revealed his or her identity, confidentiality will be maintained to the extent practicable and allowed by law. Callers should be aware, however, that it may not be possible to preserve anonymity if they identify themselves, provide other information which identifies them, the investigation reveals their identity or they inform people that they have called the Compliance Hotline. Callers should also be aware that The Arc Madison Cortland is legally required to report certain types of crimes or potential crimes and infractions to external governmental agencies.

The Compliance Hotline telephone number and website shall be visibly posted in a manner consistent with employee notification in locations frequented by The Arc employees, directors, officers, and volunteers.

Confidentiality of Reports

The Arc Madison Cortland will attempt to treat all reports made under this policy confidentially and to protect the identity of the individual who has made a report to the maximum extent possible consistent with fair

Tracking/Investigations of Reports

The web-based secure Case Management system associated with The Arc Madison Cortland's hotline will be the mechanism used to track all reports, including those that were submitted from sources other than the Hotline.

The Compliance Officer or designee shall conduct an investigation in accordance with our compliance plan.

The Compliance Officer shall prepare a report to the Compliance Committee at least annually summarizing incidents reported, investigatory findings and any corrective actions taken.

The person who is subject of the whistleblower complaint may not be present or participate in board or committee deliberations or vote on the matter relating to the complaint (except that nothing prohibits the person from providing background information or answering questions before deliberations/voting begin).

Non-Retaliation/Non-Retribution

General Principles

The Arc Madison Cortland will not impose any disciplinary or other action in retaliation, including intimidation, harassment, and discrimination, against individuals who make a report or complaint in good faith regarding any action or suspended action taken that the individual believes may violate The Arc Madison Cortland's Corporate Compliance Plan, Standards of Conduct, its Compliance Policies, or any of the laws, rules or regulations by which we are governed. "Good

faith” means the individual believes the potential violation actually occurred as he or she is reporting it.

All employees, directors, officers, vendors, and volunteers of The Arc Madison Cortland are strictly prohibited from engaging in any act, conduct or behavior which results in, or is intended to result in, retaliation or retribution against any individual for reporting his or her concerns relating to a possible violation of The Arc’s Corporate Compliance Plan, Standards of Conduct, its Compliance Policies or any of the laws, rules or regulations by which The Arc Madison Cortland is governed.

The non-retribution/non-retaliation provisions of this Policy do not permit employees, directors, officers, or volunteers to avoid the consequences of their own wrongdoing by reporting such wrongdoing. Disciplinary actions taken against an employee, director, officer, or volunteer who reports his or her own wrongdoing will be a result of the wrongdoing itself, not the reporting of such wrongdoing and, therefore, are not to be considered retaliation or retribution. Self-reporting may, however, be taken into account in determining the appropriate disciplinary action to be taken.

Reporting Complaints

If an employee, director, officer, or volunteer believes in good faith that he or she has been retaliated against for initiating a report or complaint or for participating in any investigation related to such report or complaint, then The Arc employee, director, officer, or volunteer should report the retaliation to his or her supervisor, manager, the Corporate Compliance Officer or the Compliance Hotline as soon as possible. The report should provide a thorough account of the incident(s) and should include names, dates of specific events (if available), the names of any witnesses and the location or name of any document in support of the alleged retaliation.

The compliance officer or appropriate designee will conduct a thorough and objective investigation of the incident(s).

Adverse actions in retaliation for an employee’s report or complaint may result in discipline, up to and including termination.

Discipline

Any disciplinary action for violation of the Corporate Compliance Plan, Standards of Conduct, policies and procedures or any of the laws, rules or regulations by which The Arc Madison Cortland is governed shall be imposed in accordance with The Arc’s Discipline and Incentive Program Policy.

In the event an employee makes a frivolous, malicious or knowingly false report or complaint under this Policy, the employee will be subject to appropriate discipline, up to and including termination.