



Title: Compliance Auditing and Monitoring Policy	Update By: Jennifer Cathy, President and CEO; Mary LaDuca, COO
Review Date: March 18, 2025	Reviewed By: Jennifer Cathy, President and CEO; Mary LaDuca, COO

Policy Statement:

This Compliance Auditing and Monitoring Policy applies to all departments, functions, and processes within Delphi Rise. Internal audits of our operations, processes, and internal controls are essential for evaluating the effectiveness of Delphi Rise's Corporate Compliance Program. These audits promote accountability, transparency, and continuous improvement within the organization. Compliance auditing and monitoring are ongoing processes, with regular reporting to the Board of Directors (BOD) and Senior Leadership.

The Delphi Rise Corporate Compliance Committee is responsible for ensuring the existence of procedures for internal auditing and monitoring of Delphi Rise's Corporate Compliance Program.

Responsibilities

- **Delphi Rise Corporate Compliance Committee:** Oversees internal audit functions and assures compliance with this policy.
- **Program Team and Process Leads:** Provide access to relevant documentation and implement corrective actions based on audit findings.

Procedure:

Annual Audit Workplan

- The annual Audit Workplan specifies the routine internal audits necessary for monitoring the effectiveness of the Delphi Rise Corporate Compliance Program.
- The frequency of internal audits varies based on the assessed level of risk and other key programmatic requirements.
- The Workplan communicates the scope, objectives, and schedule of routine internal audits to the BOD, Senior Leadership, and responsible parties.
- The Corporate Compliance Committee reviews the Audit Workplan quarterly to monitor adherence to internal auditing frequency, responsibilities, procedures, and reporting requirements.

Training and Education

- All affected individuals receive training and education to understand their roles and responsibilities related to auditing and monitoring the Corporate Compliance Program.
- Training ensures comprehension of the internal auditing process and the importance of compliance.

Conducting Audits

- Program team and process leads conduct audits in accordance with the approved Annual Compliance Audit



Workplan.

- Audits may include document reviews, interviews, observations, and testing of controls.

Implementation and Follow-Up

- Program leadership is responsible for implementing corrective actions in response to audit findings within the specified timeframe.

Confidentiality and Reporting

- All information obtained during routine internal audits, including audit findings and documentation, is treated as confidential and used solely for the purpose of improving organizational processes and controls.
- Regular reports on the results of internal audits and the status of corrective actions are provided to the BOD and Senior Leadership.

Disciplinary Actions

Non-compliance with this policy may result in disciplinary action, up to and including termination of employment.

Review

This policy shall be reviewed at a minimum annually.

Conclusion

This policy ensures that Delphi Rise maintains a robust Corporate Compliance Program through continuous monitoring and auditing. It promotes a culture of accountability and continuous improvement, ensuring compliance with regulatory requirements and organizational standards.