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Title: Compliance Reporting Policy and Procedure	Date Created: February 12, 2025
Review Date: March 12, 2025	Reviewed by: Jennifer Cathy, President and CEO; Mary LaDuca, COO

Purpose

The purpose of this policy is to establish a clear and confidential process for reporting compliance concerns, ensuring that all affected individuals can report suspected violations without fear of retaliation. This policy also outlines measured to verify the effectiveness of compliance reporting mechanisms, including periodic testing of the compliance hotline.

Scope

This policy applied to all affected individuals, including employees, volunteers, board members, contractors, vendors, and other stakeholders engaged with Delphi Rise.

Policy Statement

Delphi Rise is committed to maintaining the highest ethical and legal standards. All affected individuals are encouraged to report concerns about potential violations of laws, regulations, policies, or ethical standards. Reports can be made confidentially and without fear of retaliation.

Reporting Mechanism

Affected individuals may report compliance concerns through the following channels:

1. Compliance Hotline: A confidential, anonymous hotline is available for reporting concerns.
2. Direct Supervisor: Reports may be made to an immediate supervisor or department head.
3. Compliance Officer: Concerns can be reported directly to the Compliance Officer via email, phone, or in person.
4. Board of Directors: Reports may be escalated to the Board Compliance Committee when necessary.

Confidentiality and Non-Retaliation

- All reports will be treated as confidential to the extent permitted by law.
- Delphi Rise strictly prohibits retaliation against individuals who report concerns in good faith.
- Retaliation may result in disciplinary action, up to and including termination of employment or termination of contracts.

Compliance Hotline Testing Procedure

To ensure the compliance hotline is functioning as intended, Delphi Rise will implement a quarterly testing process, including:

1. Test Calls: Designated compliance personnel will conduct test calls to the hotline to assess availability, response time, and functionality.
2. System Review: Hotline logs and response records will be reviewed periodically to identify technical issues or gaps in response protocols.
3. Feedback and Adjustments: Any issued identified during testing will be addressed, and necessary improvements will be implemented to ensure effectiveness.

Investigation Process

1. Reports will be reviewed by the Compliance Officer and assessed for credibility and urgency.
2. If warranted, an internal investigation will be initiated.
3. Finding will be documented, and appropriate corrective action will be taken.
4. The Compliance Officer will provide periodic reports to the Compliance Committee and executive leadership.

Policy Review and Updates

This policy shall be reviewed annually to ensure effectiveness and compliance with applicable laws and regulations. Updates will be made necessary to reflect best practices and regulatory changes.