



<b>Title:</b> Compliance Violation Discipline Policy	<b>Created by:</b> Human Resources
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### **Policy:**

This Policy outlines the disciplinary procedures to be followed in the event of compliance violations within Delphi Rise. This policy applies to all employees, contractors, vendors, and other relevant stakeholders.

Compliance with laws, regulations, and company policies is paramount at Delphi Rise. Any violation will be subject to disciplinary action.

A compliance violation will have been considered to have occurred when any act or omission that contravenes applicable laws, regulations, company policies, or ethical standards has been verified. Measures taken by the company in response to compliance violations may include verbal warning, written warnings, suspension, demotion, termination, or legal action.

During the disciplinary proceedings, all personnel, irrespective of their position, title, or role, are subject to equal treatment in matters of discipline.

### **Procedure:**

Employees are expected to report potential compliance violations promptly through designated channels without fear of retaliation.

All reported compliance violations will be thoroughly investigated by the Compliance Officer.

Disciplinary action will be taken based on the severity and frequency of the violation, following a fair consistent process:

- **Verbal Warning:** - A verbal warning may be issued for minor or first-time compliance violation. – The warning will be documented and kept on record for future reference.
- **Written Warning:** - If the violation persists or is more serious, a written warning will be issued. – The written warning will clearly state the violation, potential consequences of further violations, and any required corrective actions. – A copy of the written warning will be placed in the employee's file.
- **Suspension:** - In cases of repeated or significant violations, the employee may be suspended from work with or without pay. – The duration of the suspension will be determined based on the severity of the violation and previous disciplinary actions.
- **Demotion:** - For serious or repeated violations, demotion to a lower position may be considered as a disciplinary measure. – Demotion will be accompanied by a reduction in salary and or/benefits commensurate with the new position.
- **Termination:** - Termination of employment may result from severe or repeated compliance violations, especially those that pose legal or financial risks to the company. – Termination decisions will be made in consultation with HR, Legal, and senior management.

Employees have the right to appeal disciplinary actions taken against them. Appeals must be submitted in writing to the CEO/President within 7 days.



The appeal will be reviewed by in an impartial manner by the CEO/President and a decision will be communicated to the employee within a reasonable timeframe. The appeal decision is the final say in the process.

All disciplinary proceedings and related documentation will be treated with confidentiality to the extent possible, respecting privacy rights and legal requirements.

**Documentation and Review**

1. This Policy will be documented and made available to all relevant employees.
2. It will be reviewed annually to ensure that it remains effective and relevant to the needs of the business.