



Title: Whistleblower Policy	Created Date: February 9, 2025
Reviewed/Approved By: Jennifer Cathy, President and CEO; Mary LaDuca, COO	Approval Date: March 12, 2025

Policy Statement

Delphi Rise is committed to fostering an organizational culture that encourages ethical behavior, compliance with all applicable laws, and open communication regarding potential misconduct. Affected individuals should feel safe and supported when reporting concerns in good faith, without fear of retaliation or intimidation.

This policy ensures protections beyond the requirements of New York State Labor Laws 740 and 741 by explicitly prohibiting any form of intimidation or retaliation against individuals who participate in Delphi Rise's compliance program in good faith.

This policy is applicable to all affected individuals, which includes all persons who are affected by the risk areas of Delphi Rise, including its employees, the chief executive, other senior administrators, managers, contractors, agents, subcontractors, independent contractors, governing body, and corporate officers, collectively referred to herein as "affected individuals."

Scope & Covered Individuals

This policy applies to all affected individuals as defined above.

Provisions & Protections

1. Protections Against Retaliation & Intimidation

No affected individual shall be subject to retaliation, intimidation, harassment, or adverse action (such as termination, demotion, reduction in hours, threats, or discrimination) for:

- Reporting in good faith any suspected violations of laws, regulations, or company policies related to Delphi Rise's operations.
- Participating in investigations, audits, or compliance-related reviews, whether conducted internally or by external regulatory bodies.
- Refusing to participate in unlawful activities or those inconsistent with ethical standards.
- Raising concerns about patient safety, care standards, or workplace integrity.
- Assisting in any compliance program activity, including reporting concerns, attending compliance-related training, or reviewing policies.

Delphi Rise strictly prohibits any attempt to intimidate or silence whistleblowers. Any act of retaliation will result in disciplinary action, up to and including termination.

2. Compliance Program Participation & Protections

Affected individuals who engage with Delphi Rise's compliance program in good faith will be protected against:

- Adverse employment actions (e.g., termination, demotion, loss of benefits, negative performance reviews).
- Hostile work environments or ostracization due to reporting concerns.
- Any retaliatory behavior from colleagues, supervisors, or leadership.
- All affected individuals are encouraged to actively participate in compliance efforts and report concerns without fear.



3. Employer Posting Requirements

Delphi Rise will:

- Post notices in well-lit, accessible areas informing affected individuals of their rights under this policy and New York State Labor Laws 740 and 741.
- Distribute this policy to all affected individuals upon hiring and annually as part of compliance training.

4. Reporting and Investigation Process

Making a Report

Employees do not need to notify their supervisor in order to be protected under this policy. This policy of non-intimidation and non-retaliation applies regardless of whether the report is made to the supervisor, Compliance Officer, or the appropriate Federal or State authority. This includes protection against retaliation, as described in 18 NYCRR 521-1.4(1)(2)(vi), for any employee who participates in the compliance program, regardless of the individual or agency the employee reports to.

Employees (complainants) are encouraged to share their questions, concerns, suggestions, or complaints with their supervisor. If this is not practical or comfortable for the employee, or the employee is not satisfied with the response, several alternative courses of action are available. The employee may:

- Speak with or write to the person in the next highest authority.
- Speak with or write to the designated Compliance Officer.
- Speak or write to the HR Administrator.
- File a written grievance and deliver it to the Secretary of Delphi Rise's Board of Directors.

Anonymous allegations are accepted but discouraged because they may hamper an investigation due to insufficient information and may seriously limit any investigative potential. Concerns expressed anonymously will be researched appropriately, with consideration given to:

- The seriousness of the issue
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources.

Supervisors are required to immediately report suspected violations to the Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations.

Reports related to wrongful conduct may be submitted on a confidential basis by the complainant. Such reports, including the identity of the complainant, will be kept confidential to the extent possible, consistent with the need to conduct a fair and thorough investigation. All Delphi representatives who have access to such information are required to safeguard the confidentiality of the information on a need-to-know basis. Violators of confidentiality are subject to disciplinary action.

5. Employer Response & Investigation

- The Compliance Officer will acknowledge receipt of all reports within five business days, unless submitted anonymously.
- All reports will be thoroughly investigated in a confidential and timely manner.
- If a violation is confirmed, appropriate corrective actions will be taken.



- The complainant will be notified of the investigation outcome unless the report was made anonymously.

6. Disciplinary Actions for Retaliation or Non-Compliance

- Any affected individual found to have engaged in retaliation or intimidation will face disciplinary action, up to and including termination.
- Individuals who knowingly make false reports with malicious intent may also face disciplinary action.

Annual Review & Documentation

- This policy will be reviewed annually to ensure continued alignment with legal and compliance standards.
- Compliance-related concerns and reports will be documented and maintained securely.