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| <b>Title:</b> Policy on Organizational Policies                                  | <b>Created Date:</b> February 12, 2025 |
| <b>Reviewed/Approved By:</b> Jennifer Cathy, President and CEO; Mary LaDuca, COO | <b>Approval Date:</b> March 12, 2025   |

### **Purpose**

The purpose of this policy is to establish clear guidelines for the development, review, approval, implementation, and maintenance of organizational policies within Delphi Rise. By ensuring transparency, consistency, and effectiveness, this policy supports informed decision-making and streamlined organizational operations.

### **Scope**

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

### **Policy Development**

- Policies shall be developed as needed to address key areas of organizational operations, governance, and conduct, as determined by senior leadership or the Compliance Committee.
- All policies must be created using the agency's policy boilerplate template.
- Each policy shall reference the applicable governing laws, regulations, or industry standards relevant to the policy's purpose and scope.

### **Policy Review and Approval**

- All policies shall be reviewed annually to ensure accuracy, relevance, and compliance with legal and regulatory requirements.
- Organizational policies will be reviewed by the Compliance Officer, the CEO, and key members of the Senior Leadership Team annually.
- Each policy's review and approval process must be documented in its header.
- Archived versions of past policies must be properly maintained.

### **Policy Implementation**

- Once approved, policies shall be communicated to all affected individuals, including employees, vendors, and board members, using the appropriate distribution methods:
  - Employees: Policies are stored in the internal shared drive.
  - Vendors: The Corporate Compliance Plan and other relevant documents are emailed based on their roles.
  - Board Members: Policies are distributed through Board packets (email) and the Board portal.
- Appropriate SOP and training shall accompany the implementation of new policies to ensure understanding and compliance.

### **Policy Monitoring and Enforcement**

- Compliance with policies shall be monitored on an ongoing basis.
- Instances of non-compliance shall be addressed in accordance with the organization's disciplinary policy.
- Feedback and suggestions for policy improvements shall be encouraged and considered for future revisions.

**Policy Compliance**

Organizational Senior Leadership are expected to familiarize themselves with this Policy on Policies and comply with its provisions. Non-compliance may result in disciplinary action, up to and including termination of employment, termination of contracts, or dismissal from volunteer position.

**Policy Review**

This Policy on Policies shall be reviewed annually or as deemed necessary by the Senior Leadership or the Compliance Committee to ensure its continued relevance and effectiveness.