



<b>Title:</b> Non-Retaliation Policy	
<b>Review date(s):</b> 4/16/2025; 11.14.2025	<b>Approved by:</b> Jennifer Cathy, President and CEO; Mary LaDuca, COO/Compliance Officer
<b>Revised date(s):</b> 11.14.2025	<b>Policy Owner:</b> Jennifer Cathy, President and CEO
<b>Approved Date:</b> November 14, 2025	<b>Original Effective Date:</b> April 10, 2025

### **Policy Statement**

This policy is consistent with OMIG's Compliance Program Requirements under 18 NYCRR Part 521 and reflects federal and state protections for whistleblowers.

Delphi Rise is committed to maintaining a safe, ethical, and legally compliant workplace in which all individuals can raise concerns, report suspected misconduct, and participate in compliance activities without fear of retaliation. Retaliation, intimidation, or any adverse action against individuals who report concerns in good faith is strictly prohibited and will result in disciplinary action, up to and including termination.

This policy expands upon protections provided under New York State Labor Laws 740 and 741 and applies to all individuals engaged with Delphi Rise's operations.

### **Scope**

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."

### **Prohibited Retaliation**

No affected individual may be subject to retaliation for:

- Reporting suspected violations of laws, regulations, or Delphi Rise's internal policies in good faith.
- Participating in investigations, audits, compliance reviews, or enforcement actions—internal or external.
- Refusing to participate in illegal activities or those inconsistent with ethical and professional standards.
- Raising concerns related to patient safety, quality of care, workplace conduct, or organizational integrity.
- Participating in any part of the compliance program (e.g., training, policy review, reporting mechanisms).

Forms of retaliation prohibited under this policy include:

- Termination or demotion
- Reduction in hours or pay
- Denial of benefits or job opportunities
- Negative performance reviews based on reporting behavior
- Threats, harassment, or verbal abuse
- Exclusion from meetings or projects
- Creating a hostile or isolating work environment



## **Reporting Retaliation**

Employees and affected individuals may report suspected retaliation through the following channels:

- Directly to a supervisor (if appropriate)
- To the Compliance Officer
- To the Human Resources Administrator
- Via a written grievance to the Secretary of the Board
- Through the anonymous Compliance Hotline

The anonymous Compliance Hotline is monitored daily and includes a voicemail box, as well as paper-based forms placed in secure lock boxes at two locations within the organization. Both are checked daily by the Compliance Officer.

Reports can be made confidentially, and anonymity will be respected to the fullest extent possible. Supervisors are required to report any allegations of retaliation immediately to the Compliance Officer.

## **Investigation and Response**

- All reports of retaliation will be promptly and confidentially investigated by the Compliance Officer.
- Receipt of the report will be acknowledged within five business days, unless submitted anonymously.
- Investigations will be thorough and objective, with efforts to protect the complainant's identity and rights.
- Appropriate corrective or disciplinary actions will be taken if retaliation is substantiated.
- The outcome of the investigation will be shared with the complainant when appropriate.

## **Accountability and Disciplinary Actions**

- Any affected individual found to have engaged in retaliatory conduct will face disciplinary measures, including termination.
- Knowingly submitting false reports with malicious intent may also result in disciplinary action.
- Violations of confidentiality relating to retaliation investigations will be treated as a serious infraction.

## **Commitment to Compliance Culture**

Delphi Rise encourages active participation in its compliance program. This policy ensures that:

- Staff and stakeholders can report concerns without fear.
- Compliance efforts are supported at all levels of the organization.
- Ethical behavior and legal compliance are foundational expectations for all affected individuals.

## **Training and Communication**

This policy will be distributed during onboarding and reviewed annually during mandatory compliance training. Refresher sessions will include case examples and scenario-based learning to ensure staff understand their rights and responsibilities.

- This policy will be distributed at onboarding and reviewed annually with all affected individuals as part of compliance training.
- Notice of non-retaliation protections will be posted in visible, accessible areas across the organization.



#### **Annual Review**

This policy will be reviewed annually and updated to reflect changes in legal requirements or organizational practices. Documentation related to retaliation reports and investigations will be maintained securely by the Compliance Officer.