



Title: Delphi Rise Corporate Compliance Plan	
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Executive Summary

Delphi Rise maintains a comprehensive Corporate Compliance Program designed in accordance with applicable federal and New York State requirements, including 18 NYCRR §521.

The Purpose of Delphi Rise’s Compliance Program:

- Prevents fraud, waste, and abuse
- Protects patient privacy and confidentiality
- Promotes ethical conduct and accountability
- Ensures accurate billing and documentation
- Identifies and mitigates compliance risk areas
- Supports adherence to federal and state laws and regulations
- Promotes high-quality care and best practices in service delivery and governance
- Protects individuals through non-retaliation and whistleblower protections

Delphi Rise’s Compliance Program Applies to “Affected Individuals.” “Affected Individuals” include all persons and entities who provide services on behalf of Delphi Rise or are involved in its operations.

- Employees
- Governing Body and Corporate Officers
- Volunteers
- Interns
- Vendors
- Contractors
- Agents
- Subcontractors
- Independent Contractors
- Consultants

All Affected Individuals are expected to uphold the following standards of conduct as a condition of their role with Delphi Rise:

- Act fairly.
- Act ethically.
- Act honestly.
- Collaborate respectfully and professionally.
- Report conflicts of interest.
- Treat clients and one another with respect at all times.
- Continuously strive to improve quality and compliance



- Immediately report any known or suspected compliance concerns through established reporting channels. Take advantage of Delphi’s anonymous compliance boxes, located in Outpatient, the Kitchen, and Open Access, or leave a message on the anonymous compliance telephone hotline (585) 450-0241. *Note: from an internal Delphi extension, dial ext. 629. To leave an anonymous report use *67.* You can also contact the Compliance Officer, Nikia Dennis at ndennis@delphirise.org or 585-667-1767.

Code of Ethics and Philosophy

I. Compliance Policy Statement

Delphi Drug and & Alcohol Council, Inc. DBA Delphi Rise, is dedicated to maintaining quality and integrity in all aspects of our operations. Accordingly, Delphi Rise is committed to conformance with high ethical standards and compliance with all governing laws and regulations not only in the delivery of our services but in the business affairs and dealings with employees, administrative staff, contractors, agents, payers, and the communities we serve. Compliance is the personal responsibility of all who are associated with Delphi Rise’s Code of Ethics, related policies and procedures, and standards developed by Delphi Rise in connections with the Corporate Compliance Program. Failure to comply with these standards may result in disciplinary action, up to and including termination.

Delphi Rise acknowledges its responsibility to adhere to all applicable laws, regulations, and guidance that govern its operations and compliance obligations. Compliance is a shared responsibility across all levels of the organization, including leadership and the Board of Directors.

Effective 2026, Delphi Rise will conduct an annual risk assessment to ensure alignment between applicable legal requirements and identified organizational risk areas.

The following laws and regulations are particularly relevant to the risk areas specified in subdivision (d) of section 521-1.3:

1. Federal Laws

- **Social Security Act** (42 U.S.C. § 1320a-7b): Governing fraud and abuse, including the Anti-Kickback Statute and Civil Monetary Penalties Law.
- **False Claims Act** (31 U.S.C. §§ 3729-3733): Prohibiting submission of false or fraudulent claims for payment to the federal government.
- **Health Insurance Portability and Accountability Act (HIPAA)** (42 U.S.C. § 1320d): Addressing healthcare fraud and abuse, privacy, and security requirements.
- **Deficit Reduction Act of 2005** (Public Law No. 109-171): Requiring certain entities to implement compliance programs to detect and prevent fraud, waste, and abuse.

2. State Laws

- **New York State False Claims Act** (State Finance Law §§ 187-194): Similar to the federal False Claims Act, with additional protections for whistleblowers.
- **New York Social Services Law** (SSL) § 145-b: Prohibiting fraudulent practices related to Medicaid and public assistance.
- **New York Penal Law Articles 175 and 176**: Addressing falsification of business records and insurance fraud.



- **Public Health Law (PHL) § 2805-j through § 2805-k:** Mandating quality assurance and reporting obligations for healthcare providers.

3. Regulations

- **42 CFR Part 438:** Governing Medicaid managed care organizations, including program integrity provisions.
- **42 CFR Part 455:** Requiring Medicaid providers to screen and enroll, disclose ownership, and report fraud.
- **Title 18 NYCRR:** Pertinent regulations governing the New York Medicaid program, including billing and reporting requirements.
- **42 CFR Part 2:** Governing the confidentiality and disclosure of substance use disorder treatment records, including consent requirements and restrictions on redisclosure, and protections.
- **Health Insurance Portability and Accountability Act (HIPAA) (45 CFR Parts 160 and 164):** Establishing national standards for the protection of individually identifiable health information, including privacy, security, and breach notification requirements.

4. Guidance and Enforcement Policies

- **Office of Inspector General (OIG) Compliance Program Guidance:** Issued for various healthcare sectors, detailing elements of effective compliance programs.
- **OMIG Guidance:** Compliance resources and requirements issued by the New York State Office of Medicaid Inspector General (OMIG).
- **Medicaid Compliance Program Regulations:** As outlined in New York Codes, Rules, and Regulations (NYCRR), Section 521-1.3.
- **New York State Office of Addiction Services and Supports (OASAS):** Policy directives, clinical standards, and administrative guidance governing substance use treatment programs, including admission, patient rights, and service delivery expectations.
- **New York State Justice Center for the Protection of People with Special Needs Requirements (Justice Center):** Mandated reporting, incident management, and protections for vulnerable populations receiving services.

5. Other Relevant Laws and Policies

- **Employment Law Compliance:** Including nondiscrimination, wage, and hour laws.
- **Data Privacy and Cybersecurity Regulations:** Including the New York SHIELD Act for data protection.
- **Corporate Integrity Agreements (if applicable):** Binding agreements with enforcement agencies.

The organization's compliance program incorporates these laws and regulations to address the following risk areas:

- Billing and payments.
- Medical necessity and quality of care.
- Governance and mandatory reporting.
- Credentialing and provider eligibility.
- Recordkeeping and document retention.
- Conflicts of interest.
- Privacy and confidentiality.

This framework ensures proactive compliance with governing laws and mitigates risks identified under subdivision (d) of section 521-1.3. These laws and regulations form the foundation of Delphi Rise's compliance risk assessment and annual Compliance Work Plan.



II. Mission

Delphi Rise has an open door and an open heart. We build relationships to support the complete well-being of individuals, families and communities facing health and social issues. We put the person at the center of everything we do to encourage growth and foster healing. There is hope for a better tomorrow. Together we Rise.

III. Expectations

We ensure all aspects of consumer care and business conduct are performed in compliance with our mission/vision statement, policies and procedures, professional standards, applicable government laws, rules and regulations, and other payer standards. Delphi Rise expects every person who provides services to our consumers to adhere to the highest ethical standards and to promote ethical behavior. Any person whose behavior is found to violate ethical standards will be disciplined appropriately.

Affected Individuals, described above, may not engage in any conduct that conflicts- or is perceived to conflict- with the best interest of Delphi Rise. Affected Individuals must disclose any circumstances where the employee or their immediate family member is an employee, consultant, owner, contractor, or investor in any entity that (i) engages in any business or maintains any relationship with Delphi Rise; (ii) provides to or receives from Delphi Rise any consumer referrals; or (iii) competes with Delphi Rise.

Affected Individuals are expected to maintain complete, accurate, and contemporaneous records as required by Delphi Rise. The term “records” includes all documents, both written and electronic, that relate to the provision of Delphi Rise services or provide support for the billing of Delphi Rise services. Records must reflect the actual services provided. Any records to be appropriately altered must reflect the date of the alteration, the name, signature, and title of the person altering the document, and the reason for the alteration, if not apparent. No person shall ever sign the name of another person to any document. Signature stamps shall not be used. Backdating and predating documents is unacceptable and will lead to discipline up to and including termination.

When any person knows or reasonably suspects that the expectations above have not been met, this must be reported to immediate supervisors, the Compliance Officer, or the President/CEO, so each situation may be appropriately dealt with. The Compliance Officer, Nikia Dennis, may be reached at (585) 667-1767.

Compliance Program Oversight

I. Compliance Officer

- The Board of Directors of Delphi Rise designates Nikia Dennis as the Compliance Officer. The Compliance Officer has direct line of communication to the President/CEO, the Board of Directors, and Delphi Rise Counsel. **The Compliance Officer operates with sufficient independence and authority to carry out the responsibilities of the Compliance Program.**



II. Job Duties

The Compliance Officer is directly obligated to serve the best interests of our Delphi Rise consumers and employees. Responsibilities of the Compliance Officer include but are not limited to:

- Developing and implementing compliance policies and procedures.
- Overseeing and monitoring the implementation of the Compliance Program.
- Directing Delphi Rise internal audits established to monitor effectiveness of compliance standards.
- Providing guidance to management, medical/clinical program personnel, and individual departments regarding policies and procedures, governmental and third-party payers.
- Overseeing efforts to communicate awareness of the existence and contents of the Compliance Plan.
- Coordinating, developing, and participating in educational and training programs.
- Guaranteeing independent contractors (consumer care, vendors, billing services, etc.) are aware of the requirements of Delphi's Corporate Compliance Plan.
- Actively seeking up-to-date material and releases regarding regulatory compliance.
- Maintaining the reporting system (hotline) and responding to concerns, complaints, and questions related to the corporate compliance Plan.
- "Serving as a subject matter expert on regulatory compliance and ethical standards." Investigating and acting on issues related to compliance.
- Coordinating internal investigations and implementing corrective action.
- Developing, drafting and updating the Compliance Workplan

Structures, Duties and Roles of the Compliance officer

I. Reporting Structure and Purpose

Compliance Committee members are appointed by the President/CEO. Compliance issues are reported by the Compliance Committee to the President/CEO and Board, where appropriate. The Compliance Committee's purpose is to advise and assist the Compliance Officer with the implementation of the Corporate Compliance Plan. The Compliance Committee meets at least quarterly and more frequently as needed based on risk or identified issues. The Compliance Committee chairperson is the Compliance Officer, Nikia Dennis. The Compliance Committee provides regular reports to the Board of Directors regarding compliance activities, risks, and corrective actions.

II. Function

The roles of the Compliance Committee include:

- Analyzing the environment where Delphi Rise does business, including legal requirements, with which it must comply.
- Reviewing and assessing existing policies and procedures that address these risk areas for possible incorporation into the Corporate Compliance Plan.*
- Ensuring required staff training is completed within 30 days of start date.
- Ensuring the training of other affected individuals within 30 days of start date.



- Working with departments to develop standards, policies and procedures that address specific risk areas and encourage compliance according to legal and ethical requirements.
- Advising and monitoring appropriate departments relative to compliance matters.
- Developing internal systems and controls to carry out compliance standards and policies.
- Monitoring internal and external audits to identify potential non-compliant issues.
- Implementing corrective and preventive actions plans.
- Developing a process to solicit, evaluate, and respond to complaints and problems.
- Advocate for sufficient funding, resources and staff for the compliance office to fully perform their responsibilities.
- Ensuring effective systems and processes are in place to identify compliance risks, and effective procedures for correcting and reporting such issues.
-

*The Compliance Program of Delphi Rise applies to the following risk areas:

- Billings;
- Payments;
- Ordered Services;
- Medical Necessity;
- Quality of Care;
- Governance;
- Mandatory Reporting;
- Credentialing;
- Contractor, Subcontractor, Agent, or Independent Contractor Oversight; and
- Other risk areas that are or should reasonably be identified by Delphi Rise through its original experience.

Delegation of Substantial Discretionary Authority

I. Requirement

Any affected individual or prospective affected individual who holds or intends to hold a position with for Delphi Rise is required to disclose any name changes and any involvement in non-compliant activities including health care related crimes. In addition, Delphi Rise performs reasonable inquiries into the background of such applicants, contractors, vendors, and members of the Board of Directors.

The following organizations may be queried with respect to potential employees, contractors, vendors, and members of the Board of Directors:

- New York Medicaid Exclusion List
- Federal Office of Inspector General Most Wanted Exclusion List
- Federal System for Award Management of Excluded Parties Exclusion List



- Federal Officer of Foreign Assets of Control-Specialty Designated Exclusion List
- Social Security Death Index
- 51 State Exclusion Databases (Including the District of Columbia)

Education and Training

I. Expectations

Education and training are critical elements of the Corporate Compliance Plan. All Affected Individuals are expected to be familiar and knowledgeable about Delphi Rise's Corporate Compliance Plan and have a solid working knowledge of their responsibilities under the plan. Compliance policies and standards will be communicated to all Affected Individuals through required participation in training program.

To ensure full compliance, all Delphi Rise staff members are required to complete Compliance Training within the first 30 days of employment. Failure to complete the training within this timeframe will result in the staff member being ineligible to work their next scheduled shift until the training is completed.

II. Training Topics – General

All Affected Individuals shall participate in training on the topics identified below:

- Overview of the Corporate Compliance Program, including required elements, risk areas, and expectations for all affected individuals.
- Code of Ethics, standards of conduct, and expectations for ethical and legal behavior.
- Roles and responsibilities related to compliance, including the Compliance Officer, Compliance Committee, leadership, and affected individuals.
- Duty to report suspected misconduct, including reporting mechanisms, confidentiality, and the Non-Intimidation and Non-Retaliation Policy.
- Fraud, Waste, and Abuse (FWA), including the Federal and State False Claims Act and whistleblower protections.
- Federal and State laws and regulations related to compliance, including but not limited to:
 - Anti-Kickback Statute and Beneficiary Inducement prohibitions;
 - Eliminating Kickbacks in Recovery Act (EKRA), as applicable;
 - Physician Self-Referral Law (Stark Law).
- Conflicts of interest and requirements for disclosure.
- Government and private payer reimbursement principles, including medical necessity and billing compliance.
- Documentation standards, including accurate, timely, and complete documentation, and prohibitions against backdating, falsification, or signing for another individual.
- Record retention requirements, including proper maintenance and destruction of records.
- Overpayment identification, reporting, and return obligations.
- Exclusion screening requirements and prohibitions on employing or contracting with excluded individuals or entities.



- Auditing and monitoring activities, including the organization’s approach to identifying and addressing compliance risks.
- Disciplinary standards and consequences for non-compliance.
- Additional topics as identified through risk assessments, audits, regulatory changes, or organizational needs.

III. Training Topics – Targeted

In addition to the above, targeted training will be provided to all Supervisors, Directors, and any other Affected Individuals whose job responsibilities include activities related to compliance topics. Managers shall assist the Compliance Officer in identifying areas that require specific training and are responsible for communicating the terms of this Corporate Compliance Plan to their direct reports-employees of Delphi Rise.

IV. Orientation

As part of their orientation, each Affected Individual shall receive a written copy of the Corporate Compliance Plan, policies, and specific standards of conduct that affect their position.

V. Attendance

All education and training relating to the Corporate Compliance Plan will be verified by attendance and signed acknowledgment of receipt of the Corporate Compliance Plan and standards.

Completion of all required training is tracked and documented. Failure to complete required training may result in disciplinary action and removal from scheduled duties until completed.

Effective Confidential Communication

I. Expectations

Open lines of communication between the Compliance Officer and each Affected Individual subject to this Plan are essential to the success of our Corporate Compliance Program. Every Affected Individual has an obligation to refuse to participate in any wrongful course of action and to report the actions according to the procedure listed below.

II. Reporting Procedure

Delphi Rise maintains multiple confidential reporting mechanisms to ensure all individuals can report concerns without fear of retaliation. If an Affected Individual witnesses, learns of or is asked to participate in any activities that are potentially in violation of this Corporate Compliance Plan, they should contact the Compliance Officer, their immediate supervisor, or the President/ CEO. Reports may be made in person or by calling (585) 450-0241, a telephone line dedicated for the purpose of receiving such notification; internal call to Ext. 629 (to report anonymously use *67); mailing information to Nikia Dennis, Compliance Officer, 72 Hinchey Road, Rochester, NY 14624; or placing a written statement in the suggestion drop box located in the front lobby, Kitchen, and Open Access, 72 Hinchey Road, Rochester, NY 14624. All reports will be reviewed promptly. Initial review will occur within 5 business days, and investigations will be initiated as appropriate.

The confidentiality of the person reporting is maintained unless the matter is subject to a disciplinary proceeding,



referred to, or under investigation by, MFCU, OMIG or law enforcement, or disclosure is required during a legal proceeding, and such persons shall be protected under the required provider's policy for non-intimidation and non-retaliation

Reports may be made through the following chain, depending on the situation:

- Immediate Supervisor
- Compliance Officer
- President/CEO
- Board of Directors (for concerns involving executive leadership)

Upon receipt of a question or concern, any Supervisor or Director shall document the issue at hand and report to the Compliance Officer. Any questions or concerns relating to the potential non-compliance by the Compliance Officer should be reported immediately to the President/CEO. Any potential compliance concerns with the President/CEO should be reported to the Board Chair, Zahira Jiminez at zjimenez@easthouse.org or (585) 754-7099 and/or the Board Secretary via written notice.

addressed to: Delphi Rise
Attn: Board Secretary
[Insert Address]

Individuals may also request that the Compliance Officer forward a report to the Board of Directors. Such communications will be forwarded without alteration.

The Compliance Officer or designee shall record the information necessary to conduct an appropriate investigation of all complaints. If the Affected Individual was seeking information concerning the Code of Ethics/Conduct or its application, the Compliance Officer or designee shall record the facts of the call and its nature of the information sought and respond as appropriate. Delphi Rise shall, as much as is possible, protect the anonymity of the Affected Individual who reports any complaint or raises a question about Delphi Rise's Corporate Compliance Policies and standards. Affected Individuals must be aware, however, that there may be a point in time that an individual's identity must become known or revealed in certain instances, such as, when government authorities become involved.

III. Protections

Delphi Rise strictly prohibits retaliation, intimidation, or harassment against any individual who reports a concern in good faith. The identity of the individual who issues the report will be fully safeguarded and will be protected against retribution retaliation or intimidation. Report of any suspected violation of this Plan by following the above shall not result in any retribution, retaliation, or intimidation. Any individual found to have engaged in retaliation will be subject to disciplinary action, up to and including termination. Any threat of reprisal against a person who acts in good faith pursuant to their responsibilities under the Plan is acting against the Delphi Rise's Corporate Compliance Policy. Discipline, up to and including termination of employment/contract/appointment/assignment, will result if such reprisal is proven.

IV. Guidance

Any Affected Individuals may seek guidance with respect to the Corporate Compliance Plan or Code of Ethics/Conduct at any time by following the reporting mechanisms outlines above.



Enforcement of Compliance Standards

I. Background Investigations

For all employees who have authority to make decisions that may involve compliance issues, Delphi Rise will conduct reasonable and prudent background investigation including a reference check as part of every employment application.

II. Disciplinary Action – General

Affected Individuals who fail to comply with Delphi Rise’s Corporate Compliance Policy and standards, or who have engaged in conduct that has the potential of impairing Delphi Rise’s status as a reliable, honest, and trustworthy service provider, will be subject to disciplinary action up to and including termination of employment, contract, assignment, or appointment. Anyone regardless of position, function, or title will receive the same discipline as it is related to compliance concerns. Any discipline will be appropriately documented in the Individual’s file, along with a written statement of reason(s) for imposing such discipline. The Compliance Officer shall maintain documentation of disciplinary actions related to the Corporate Compliance Plan in coordination with Human Resources, to ensure consistency and appropriate enforcement. The Compliance Officer shall report at least quarterly to the Board of Directors regarding such actions.

III. Performance Evaluation – Supervisory

Delphi Rise’s Corporate Compliance Program requires that the promotion of, and adherence to, the elements of the Corporate Compliance Program be a factor in evaluating the performance of Delphi Rise’s employees and contractors. They will be periodically trained in new compliance policies and procedures. In addition, all managers and supervisors will:

- Discuss with all supervised employees at onboarding the compliance policies and legal requirements applicable to their function.
- Inform all supervised personnel that strict compliance with these policies and requirements is a condition of employment.
- Disclose that Delphi Rise will take disciplinary action up to and including termination or revocation of privileges for violation of these policies and requirements.

IV. Disciplinary Action – Supervisory

Directors and supervisors will face disciplinary action if they fail to adequately support their teams in detecting noncompliance with policies and legal requirements. If reasonable diligence on their part could have led to the earlier discovery of any issues, allowing Delphi Rise the opportunity to address them, they will be held accountable.

Auditing and Monitoring of Compliance Activities

I. Internal Audits

Ongoing evaluation is critical in detecting non-compliance and will help ensure the success of Delphi Rise’s Corporate Compliance Program. An ongoing auditing and monitoring system, implemented by the Compliance Officer and in



consultation with the Compliance Committee, is an integral component of our auditing and monitoring systems. This ongoing evaluation shall include the following:

- Review of relationships with third-party contractors, specifically those who substantive exposure to government enforcement actions.
- Compliance audits of compliance policies and standards; and
- Review of documentation and billing relating to claims made to federal, state, and private payers for reimbursement, performed internally or by an external consultant as determined by Compliance Officer and Compliance Committee.

The audits and reviews will examine Delphi Rise's compliance with specific rules and policies through on-site visits, personnel interviews, general questionnaires (submitted to employees and contractors), and consumer record documentation reviews. Auditing and monitoring activities are conducted on a routine basis, including scheduled and random reviews, and are documented and tracked through the Compliance Work Plan. Findings from audits are used to inform corrective action plans and ongoing risk mitigation strategies.

II. Plan Integrity

Additional steps to ensure the integrity of the Corporate Compliance Plan will include:

- Immediate notification of the Compliance Officer in the event of any visits, audits, investigations, or surveys by any federal or state agency or authority. Immediate provision to the Compliance Officer of a photocopy of any correspondence from any regulatory agency charged with licensing Delphi Rise and/or administering a federally or state-funded program or County-funded program with which Delphi Rise participates.
- Establishment of process detailing ongoing notification by the Compliance Officer to all appropriate personnel of any changed in laws, regulations, or policies as well as appropriate to assure continuous compliance.

Detection and Response

I. Violation Detection

The Compliance Officer and President/CEO shall determine whether there is any basis to suspect that a violation of the Corporate Compliance Plan has occurred.

If it is determined that a violation has occurred, the matter shall be referred to legal counsel who, with the assistance of the Compliance Officer, shall conduct a more detailed investigation. This investigation may include, but is not limited to, the following:

- Interviews with individuals having knowledge of the facts alleged.
- A review of documents.
- Legal research and contact with governmental agencies for the purpose of clarification.

If advice is sought from a governmental agency, the request and any written or oral response shall be fully documented. All investigations will be documented, tracked, and resolved in a timely manner. Corrective actions will be implemented



and monitored to ensure sustained compliance

II. Reporting

At the conclusion of an investigation involving legal counsel, they shall issue a report to the Compliance Officer, the President/CEO, and the Compliance Committee summarizing their findings, conclusions, and recommendations will render an opinion as to whether a violation of the law has occurred.

The report will be reviewed with legal counsel in attendance. Any additional action will be on the advice of counsel.

The Compliance Officer shall report to the Compliance Committee regarding each investigation conducted.

III. Rectification

If Delphi Rise identifies that an overpayment was received from any third-party payer, the appropriate regulatory body (funder) and/or prosecutorial (attorney general/police) authority will be appropriately notified with the advice and assistance of counsel. Identified overpayments will be reported and returned within required regulatory timeframes, including the federal 60-day rule where applicable. No funds received because of overpayments will be retained. In instances where it appears an affirmative fraud may have occurred, appropriate amounts shall be returned after consultation and approval by involved regulatory and/or prosecutorial authorities. Systems shall also be put in place to prevent such overpayments in the future.

IV. Record Keeping

Regardless of whether a report is made to a governmental agency, the Compliance Officer shall maintain a record of the investigation including copies of all pertinent documentation. All documentation must be completed in a timely manner in accordance with organizational policy and payer requirements. Documentation is subject to internal and external audit. This record will be considered confidential and privileged and will not be released without the approval of the President/CEO or legal counsel.

Non-Retaliation, Non-Intimidation and Whistleblower Provisions and Protections

I. Non-Retaliation and Non-Intimidation

Delphi Rise requires all Affected Individuals to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. They must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. It is Delphi's intent to adhere to all legal statutes that apply to the organization and achieve full legal compliance. The support of all Delphi representatives is necessary to achieve this goal.

Wrongful Conduct includes, but is not limited to, any violation of law committed during the performance of duties or on Delphi premises; misconduct or violation of Delphi regulations as stated in the Employee Handbook or other Delphi-written procedures; personal gain or other non-authorized purpose, money, resources or authority for personal gain or other non-authorized purposes; and any violation of ethics. Additionally, under this provision, any impropriety that potentially impacts the integrity and effective operation of Delphi should be reported.



It is the responsibility of all Delphi Directors, Officers, employees, and representatives to comply with this policy and to report any Wrongful Conduct or suspected Wrongful Conducts in accordance with this policy.

No Director, Officer, employee, or other representative who in good faith engages in any of the following activities will be exposed to harassment, retaliation, or any adverse employment consequence because of such action, nor will any Delphi representative discourage, prevent interfere with or conceal any attempt by another representative to report such action as they are subject to non-retaliation under whistleblower protection policies (including those under **18 NYCRR 521-1.4(1)(2)(vi)**):

1. **Reporting Violations or Misconduct:** Directors, Officers, employees, and other representatives who report suspected violations of laws, regulations, or company policies—whether to supervisors, compliance officers, or appropriate external authorities—are protected from retaliation.
2. **Good Faith Participation in Investigations:** Directors, Officers, employees, and other representatives who participate in an investigation of alleged wrongdoing, even if they are not the person who reported the violation, are protected from retaliation. This includes giving testimony, providing evidence, or cooperating with internal or external investigations.
3. **Refusing to Participate in Illegal Activities:** Directors, Officers, employees, and other representatives who refuse to engage in activities they believe to be unlawful, unethical, or in violation of company policies, even if those activities are directed by supervisors or other authorities within the organization, are protected.
4. **Assisting in Compliance Program Activities:** Directors, Officers, employees, and other representatives who assist in the implementation or compliance of the organization’s ethics or compliance programs—such as helping with audits, training, or policy development—are protected against retaliation.
5. **Exercising Legal Rights:** Directors, Officers, employees, and other representatives are protected from retaliation when they exercise their legal rights under the law, such as requesting accommodations, participating in labor union activities, or engaging in other protected activities under federal, state, or local laws.
6. **Participation in Whistleblower Hotlines or Helplines:** Directors, Officers, employees, and other representatives who use or participate in anonymous whistleblower hotlines or helplines provided by the organization to report misconduct are protected from retaliation.
7. **Engagement in Legal Proceedings:** Directors, Officers, employees, and other representatives who participate in legal actions, such as lawsuits, that involve allegations of wrongdoing or violations of laws, are also protected from retaliation.
8. **Opposition to Discriminatory Practices:** Directors, Officers, employees, and other representatives who raise concerns about discriminatory, harassing, or retaliatory actions within the organization are protected, even if they are not formally filing a complaint.
9. **Requesting or Using Leave for Compliance Activities:** Employees who take time off to participate in compliance-related activities, such as attending training, are also protected from retaliation.

A representative who engages in such prohibited conduct is subject to discipline, which may include immediate termination or removal from office.

Any threat of reprisal against a person who acts in good faith pursuant to his or her responsibilities under the Compliance Program is acting against Delphi Rise’s Compliance Program shall report the actions to the Corporate Compliance Officer who shall investigate the allegation.



Affected Individuals who believe they have been subject to retribution, retaliation and/or intimidation for reporting misconduct or good faith participation in the Compliance Program shall report the actions to the Corporate Compliance Officer who shall investigate the allegation.

II. Whistleblower Provisions and Protections

The **False Claims Act** provides protection to Whistleblowers who are discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against in the terms and conditions of their employment because of their furtherance of an action under the False Claims Act.

Delphi Rise will not take any retaliatory action against an employee if the employee discloses information about Delphi Rise's policies, practices, or activities to a regulatory, law enforcement, or other similar agency or public official. Protected disclosures are those that assert that Delphi Rise is in violation of a law that creates a substantial and specific danger to public health and safety, constitutes health care fraud under the law, or assert that, in good faith, the employee believes constitutes improper quality of patient care.

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 Board Chair, Zahira Jiminez and/or the Board Secretary.
 - addressed to: Delphi Rise
 - Attn: Board Secretary or Board Chair
 - [Insert Address]
 - Individuals may also request that the Compliance Officer forward a report to the Board of Directors. Such communications will be forwarded without alteration.

Anonymous allegations are accepted, however providing your name will allow for follow-up questions and will support a more thorough investigation. If reporting anonymously, please include as much detail as possible while avoiding client names and any other identifying information.

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.

The Compliance Officer will notify the complainant and acknowledge receipt of the alleged wrongful conduct report within five business days, unless such report was submitted anonymously. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Key Enhancements for 2026

- **Key Enhancements for 2026**
- **Strengthened Regulatory Alignment:** Enhanced alignment with federal and New York State requirements, including incorporation of governing laws relevant to identified risk areas under 18 NYCRR §521-1.3 and clearer linkage to the annual Compliance Work Plan.
- **Clarified Roles, Leadership, and Oversight:** Defined responsibilities and reporting structure across the Compliance Officer, Compliance Committee, executive leadership, and Board of Directors. The Compliance Officer role has been strengthened to include responsibility for development and maintenance of the Compliance Work Plan, and Compliance Committee leadership has been formally established.
- **Enhanced Compliance Committee Functions:** Expanded the role of the Compliance Committee to include oversight of overpayment identification and reporting processes; ensuring policies, procedures, and training remain accurate and current; promoting communication and coordination across compliance activities; and advocating for adequate resources to support the Compliance Program.
- **Enhanced Reporting and Whistleblower Protections:** Strengthened confidential reporting pathways, established clearer response expectations, and updated the Whistleblower Policy to align with 18 NYCRR §521-1.4, reinforcing non-retaliation and non-intimidation protections.
- **Improved Training and Accountability:** Standardized compliance training requirements for all Affected Individuals, including onboarding and annual training, with clear expectations for tracking, completion, and enforcement.
- **Expanded Auditing, Monitoring, and Response Protocols:** Formalized routine auditing and monitoring processes, and strengthened expectations for timely investigation, documentation, corrective action, and follow-up of all compliance concerns.
- **Overpayment Identification and Reporting:** Established clear procedures for identifying, reporting, and returning overpayments in accordance with regulatory requirements.
- **Enhanced Confidentiality Protections:** Strengthened language to ensure the confidentiality of individuals reporting concerns, with appropriate limitations related to legal or regulatory proceedings, and reinforced protections under non-retaliation policies.



- **Expanded Definitions and Clarity:** Broadened the definition of Affected Individuals, clarified key risk areas, and improved overall structure and language to support understanding and consistent implementation across the organization.