

## Overview

The revisions below were made on **November 28, 2023**.

**Document Name:** Prohibition of Retaliation for Reporting Compliance Concerns

**Document Owner:** Jeff Felty, Chief Compliance Officer

**Document Approver:** Lisa Cunningham, Vice President of Human Resources

## Stakeholders

The individuals and/or groups affected by this update:

- All Centria team members


## Summary / Nature of the Update

Removed "Corporate" from Corporate Compliance Department.

## Detailed Updates by Page

The table below describes the updates made by page number.

Page Number	Update
1	Removed "Corporate"

	<b>Policy + Procedure Title</b>	<b>Document Number</b>	CC.P+P.013.03
	Prohibition of Retaliation for Reporting Compliance Concerns	<b>Revision Level</b>	3
	<b>Policy + Procedure Owner</b>	<b>Revision / Effective Date</b>	11/2023
	Chief Compliance Officer	<b>Policy + Procedure Approver</b>	Vice President of Human Resources

**Purpose**

To establish a non-retaliation policy to protect workforce members who, in good faith, report known or suspected instances of inappropriate business conduct or activity.

**Responsibility**

All Centria team members, agents, and contractors (collectively, “workforce” or “workforce members”).

**Policy**

Supervisors, managers, or workforce members are not permitted to engage in retaliation, retribution, or any form of harassment directed against any workforce member who, in good faith, reports a compliance concern.


**Definitions**

Good Faith is defined as the individual reasonably believes or perceives the information reported to be true.

Business Activity is defined as any activity that occurs during the course of conducting Centria’s business.

**Procedure**

1. Workforce members have the responsibility to report, in good faith, concerns about actual or potential wrongdoing. Both direct and anonymous reporting mechanisms are available to all Centria workforce members to assist in meeting this responsibility.
2. Centria is committed to a policy that requires timely disclosure of such concerns and prohibits any action directed against a workforce member for making a good faith report of a compliance concern.
3. Any manager, supervisor, or other workforce member who engages in retaliation, retribution, or harassment against a reporting workforce member is subject to corrective action up to and including dismissal on the first offense.
4. All instances of retaliation, retribution, or harassment against a reporting workforce member should be brought to the attention of the Compliance Department. A Compliance Officer will coordinate an investigation and the determination of any corrective action with the appropriate business leader and Centria’s Human Resources Department. Centria’s Legal Department may also conduct investigations into these matters.
5. Prompt and forthright disclosure of an error by a workforce member when discovered, even if the error constitutes inappropriate or inadequate performance, will be considered a positive constructive action by the workforce member.
6. If a workforce member reports a concern regarding or involving his or her own inappropriate or inadequate actions, reporting those concerns will not exempt him or her from the potential consequences of those actions.
7. In the event the investigation reveals or uncovers what appears to be criminal activity, local, state, and/or federal agencies will be notified as appropriate.
8. Any team member using designated compliance reporting mechanisms (such as the Compliance Service Desk or Compliance Hotline) to purposely report false information or to attempt to settle a personal grievance by making false reports will be subject to corrective action in accordance with Centria’s disciplinary policies.

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**Team Member Rights and Protections Pursuant to Federal and State False Claims Act**

In addition to Centria’s requirement to report all concerns of wrongdoing to management without fear of retaliation or retribution, team members have additional rights and protections under various federal and state laws. Under Federal and State False Claims Acts, team members have the rights and protections outlined below.

**Rights**

A team member has the right to lawfully file a “whistle blower” or qui tam lawsuit against other individuals or entities which make false claims for financial payment or reimbursement from the federal government or a state government. In most cases, a team member has the further right to participate in the investigation of such lawsuits, testify in such lawsuits, or otherwise participate in the prosecution of such lawsuits.

**Protections**

As a team member engaging in protected activities described above, he or she may not be subjected to retaliation through an adverse employment action or subjected to any other form of discrimination. Examples of adverse employment actions include, but are not limited to, discharge from employment, demotion, suspension, and harassment. An employer who engages in any form of retaliatory action is required to make the team member whole. This may include reinstatement, possible payment of back pay owed plus interest, compensation for any special damages, and attorney fees and costs. To be entitled to these protections, a team member’s actions must be lawful. Both the Federal and some State False Claims Acts provide for sanctions against anyone who files a whistleblower suit that is found to be frivolous, vexatious, or filed primarily for the purposes of harassment.

**Resources**

Prohibitions of retaliation related to any reporting of compliance concerns also exist in Centria’s *Code of Conduct*, *Centria’s Internal Reporting Obligations, Investigations, General Communications* policy, and *Centria’s Fraud Prevention* policy. Additional team member rights and protections are provided in *Centria’s Fraud Prevention* policy. All resources listed above are available to Centria team members, agents, and contractors for review and/or download on Centria’s website and the Pulse. Printed copies will be provided to team members, agents, or contractors upon request.