

OFFICIAL POLICY

Confidential Reporting Hotline

PURPOSE

Easterseals of Southern California (ESSC) is committed to the highest possible standards of ethical, moral and legal business conduct. The Confidential Reporting Hotline Policy assures reporters protection from reprisals or victimization for alerting ESSC in good faith about suspicious acts (whistleblowing).

SCOPE

The Confidential Reporting Hotline Policy applies to full-time, part-time, and temporary associates as well as contractors, subcontractors, vendors and providers. Callers to the hotline are further known as "reporters."

This ESSC whistleblowing policy encourages the disclosure of serious concerns that may have an adverse impact to the organization, for example, issues that:

- may lead to incorrect financial reporting
- are unlawful
- are not in line with company policy and the ESSC Code of Ethics
- is improper conduct of any nature

CONFIDENTIALITY AND ANONYMITY

Every effort will be made to protect a reporter's identity by Lighthouse Services, the third party hotline administrator contracted by ESSC. A reporter's anonymity will be protected to the extent possible by law. However, a reporter's identity may become known to ESSC authorized individuals (Chief Legal Counsel, Compliance Officer, Director of Risk Services) during the course of an internal and/or external investigation based on information provided. Incoming reports received by Lighthouse Services and forwarded to ESSC's designee (e.g., ESSC's Compliance Officer) may or may not be investigated at the sole discretion of ESSC.

The hotline policy allows callers to remain anonymous at their option. Anonymous concerns will be investigated with consideration to:

- seriousness of the issue raised
- credibility of the concern
- likelihood of confirming the allegation from other sources

If a caller believes their anonymity is not required, they should follow existing grievance procedures. Routine business matters that do not require anonymity should be directed to ESSC supervisors or Human Resources Directors and are not covered under this policy.

EVIDENCE

Although reporters are not expected to prove an allegation, the person submitting a report must demonstrate in the report sufficient grounds for concern.

HARASSMENT SAFEGUARDS

Harassment or victimization of individuals submitting hotline reports will not be tolerated.

ALLEGATIONS NOT REPORTED IN GOOD FAITH

Hotline calls with allegations that are not reported in good faith may result in disciplinary action.

Confidential Reporting Hotline Policy *continued*

HOW A REPORT WILL BE HANDLED

The Audit Committee of the ESSC Board of Directors receives a copy of every anonymous and self-identified report from Lighthouse Services, as well as follow-up reports from the ESSC Compliance Officer. Actions taken as a result of a hotline report will depend on the nature of the concern.

Initial Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

Feedback to Reporter

Whether reported directly to ESSC personnel or through the hotline, the reporter will be given the opportunity to receive follow-up on their concern:

- Acknowledging that the concern was received
- Indicating how the matter will be addressed
- Giving estimated time for a final response
- Advising whether initial inquiries have been made
- Advising whether further investigations will follow, and if not, the reason why

The amount of contact between the reporter and the agency investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the reporter remains available for follow-up. Further information may be sought from the reporter.

Outcome of an Investigation

At the discretion of ESSC and subject to legal and other constraints, the reporter may be entitled to receive information about the outcome of an investigation.

REPORTING INSTRUCTIONS

A whistleblowing process is for reporting serious and sensitive issues related to 1) suspected fraud, 2) ethics and compliance violations, 3) HIPAA violations, 4) employee safety concerns, and 5) serious HR violations.* The sooner a concern is expressed, the easier it is for ESSC to take action. Reporting can be done 24 hours per day/7 days per week in one of the following ways:

| REPORTING METHOD | CONTACT |
|--|--|
| Telephone (USA) | English speaking: (800) 670-0002 Spanish speaking: (800) 216-1288 |
| Online | www.lighthouse-services.com/essc |
| Email <i>Must include ESSC's name with report</i> | reports@lighthouse-services.com |
| Fax <i>Must include ESSC's name with report</i> | For written documents: (215) 689-3885 |

To schedule a meeting with the ESSC Compliance officer, email compliance@essc.org. **The Compliance Officer email is for not for reporting allegations.** Do not report hotline concerns to the compliance officer email if anonymity is desired.

*Reporting client abuse issues, violations, and client quality of care must continue to be addressed by the appropriate management team in applicable service lines. Employment concerns must continue to be reported through normal channels such as a supervisor or the Human Resources Director.

ESSC reserves the right to modify or amend this policy at any time as it may deem necessary