

GENERAL HOTLINE

Purpose:

To promote a culture of legal and regulatory compliance, we have established a problem resolution process and a strict non-retaliation policy to protect employees who report problems and concerns in good faith from retaliation. Any form of retaliation can undermine the problem resolution process and result in a failure of communication channels in the organization. A hotline has been established to provide a confidential process for reporting any potential violations of laws, regulations, policies or procedures in a manner to permit the anonymity of the reporter, if desired. The purpose of this hotline is to ensure the timely identification and resolution of all issues that may adversely affect employees, customers or the organization. Employees are expected to report problems or concerns either anonymously or in confidence via the hotline when they believe a potential violation has taken place.

In addition, the Company has a Whistleblower Policy to further reiterate its commitment to integrity, ethics and open and non-retaliatory work environment.

Policies:

1. All employees are responsible for reporting perceived misconduct, including actual or potential violations of law, regulation, policy, and procedures.
2. An “open-door policy” will be maintained at all levels of management to encourage employees to report problems and concerns.
3. We have established and will maintain a telephone hotline that employees may use to report problems and concerns either anonymously or in confidence.
4. The telephone number should be made readily available to all employees by conspicuously posting the telephone number in common work areas and in other ways.
5. Employees who report problems and concerns via the hotline in good faith will be protected from any form of retaliation or retribution. Any form of retaliation against any employee who reports a perceived problem or concern in good faith is strictly prohibited, and any employee who commits or condones any form of retaliation will be subject to discipline up to, and including, termination.
6. All those who are employed in the hotline operation are expected to act with utmost discretion and integrity in assuring that information received is acted upon in a reasonable and proper manner. Everyone who receives or is assigned responsibilities for hotline calls shall agree to the terms of confidentiality and will comply with a Hotline Confidentiality Agreement.
7. Employees are strongly encouraged to report problems and concerns via the chain-of-command. However, the hotline channel is always available if special circumstances exist, if issues are not being properly addressed or if an employee feels more comfortable using that means of reporting.
8. Employees cannot exempt themselves from the consequences of their own misconduct by reporting the issue, although self-reporting may be taken into account in determining appropriate disciplinary action.



9. A live person who will debrief the caller and make a report on all information provided will answer the hotline.

PROCEDURES:

1. Anyone with knowledge of a potential violation of law, regulation, code of conduct, policy or procedure has an affirmative duty to report that information to the Compliance Manager. Failure to report a potential violation may result in appropriate disciplinary action. Anonymous or confidential submissions of concerns can be made directly to the compliance hotline.
2. The hotline is available 24 hours a day, 365 days a year.
3. All calls to the hotline will be documented, including the nature of the complaint or violation reported, the date & time reported, and the department or facility affected.
4. Depending upon the allegations, it may be appropriate for the Compliance Manager to address an issue with: (a) immediate supervisor, (b) department manager, (c) department head/director, or (d) senior administrative officer of the organization.
5. The hotline officer will ensure that all hotline calls are addressed in an appropriate and timely manner, as well as in accordance with these and all related policies and procedures. Other responsibilities include:
 - ensuring proper functioning of the hotline
 - establishing reporting and records maintenance procedures
 - providing feedback to callers when necessary
 - reporting hotline activity to management
 - maintaining security for all caller information and related documents
6. The hotline will be staffed with qualified and properly trained personnel. All callers will be given the opportunity to speak with a live operator.
7. All callers to the hotline will hear the same pre-recorded message explaining their rights, any limitations, the non-retaliation policy and other pertinent information.
8. No attempt will be made to identify a caller who requests anonymity.
9. Whenever callers disclose their identity, it will be held in confidence to the fullest extent allowed by law.
10. Calls will be documented on the confidential hotline intake form (Confidential Hotline Report). All call records will be logged and sequentially numbered upon receipt on this form and placed in the care and custody of the hotline management.
11. When a new hotline report is submitted, all callers will be assigned a confidential report number and asked to contact the hotline in ten business days for any required follow-up. It is the responsibility of the hotline officer to ensure any required follow-up information is provided to the hotline in advance of the scheduled call-back date.
12. The hotline operation will involve other departments, as appropriate, for advice or further investigation.



13. Management must take appropriate measures to ensure support for this policy and encourage the reporting of problems and concerns. At a minimum, the following actions should be taken and become an ongoing aspect of the management process:
 - Notify all employees of the policy via email.
 - Post a copy of this policy on Workstream's intranet.