

# Marc Center of Mesa, Inc. Corporate Compliance

## Marc Center's "No Reprisal" (Whistleblower) Protection Policy

**PURPOSE:** As part of Marc Center of Mesa, Inc.'s corporate compliance program and plan, the agency intends to foster and maintain an organizational culture of the highest ethical standards possible as stewards of the interests and trust of the agency's customers, its governmental and non governmental funding sources and the public at large. To that end, Marc Center shall develop and implement systems to encourage and support the opportunity for any agency employee, volunteer or business associate to report criminal activity or suspicious behavior and prevent healthcare fraud, waste and abuse.

**POLICY:** Marc Center expects and intends its employees, consultants, volunteers and the agency's board of directors to maintain the highest standards of conduct related to the receipt and disbursement of federal funds. All Marc Center employees, consultants and volunteers are protected against any kind of retaliation for detecting and reporting fraud and abuse. It is Marc Center's policy that no employee and/or volunteer shall be punished solely on the basis that he or she reported what was reasonably believed to be an act of wrongdoing or a violation of the agency's corporate compliance standards or the agency's code of ethics. An employee will be subject to disciplinary action, however, if Marc Center reasonably concludes that the employee knowingly fabricated the report of wrongdoing or knowingly distorted, exaggerated or minimized to either injure someone else or to protect the reporting party or others. An employee whose report of misconduct contains admissions of personal wrongdoing will not, however, be guaranteed protection from disciplinary action. The weight to be given the self confession will depend on all of the facts known to Marc Center at the time it makes its disciplinary decisions. In determining what, if any disciplinary action may be taken against the employee, Marc Center will take into account an employee's own admission of wrongdoing; provided, however, that the reporting employee's conduct was not previously known to the agency or its discovery was not imminent, and that the admission was complete and truthful.

**PROCEDURE:** Marc Center's corporate compliance hotline is 480-969-3800x217, and its corporate compliance officer is its HR Director whose direct telephone number is 480-969-3800x210. You may also email Marc's corporate compliance officer at any time with any questions or concerns you might have: [corporate.officer@marccenter.com](mailto:corporate.officer@marccenter.com). You may also, of course, discuss these issues with your supervisor, but you may always contact Marc's corporate compliance officer at any time for any reason related to the standards to which each and every Marc Center employee and volunteer must adhere