

Non-Retaliation Policy

Approval Date:
September 2025

Final Approver:
Corporate Compliance Committee

Please check who this impacts:

☒ SYSTEM (ALL ENTITIES)

***Subject/Purpose:** Baptist Health recognizes that a critical aspect of its compliance program is the establishment of a culture that promotes prevention, detection and resolution of instances of conduct that do not conform to federal, state and private payer health care program requirements, as well as the organization's ethical and business policies. To promote this culture, Baptist Health established a strict non-retaliation policy to protect employees and others who report concerns in good faith from retaliation.

***Scope of Responsibility:** This policy is applicable to all of the Baptist Health System.

Definitions: N/A

Regulatory Standards (if any): N/A

Equipment Needed: N/A

***General Instructions:**

1. All employees have a duty for reporting perceived misconduct, including actual or potential violations of laws, regulations, policies, procedures or the Baptist Health Code of Ethical Conduct
2. An "open-door policy" will be maintained at all levels of management to encourage employees to report problems and concerns.
3. Employees are encouraged to utilize the Compliance Hotline. To ensure their protection against retaliation, callers may remain anonymous
4. Employees may also communicate with the Human Resources Department (HR) if their problem or concern is not resolved
5. Any form of retaliation against any employee who reports a perceived problem or concern in good faith is strictly prohibited
6. Any employee who commits or condones any form of retaliation will be subject to discipline, up to and including, termination.
7. 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 the appropriate course of action
 - a. **Procedures that apply to all employees**
 - i. Knowledge of misconduct, including actual or potential violations of laws, regulations, policies, procedures or the organization's standards of conduct must be immediately reported to management, HR, the Corporate Compliance Officer (CCO) or the Compliance Line.
 - ii. Knowledge of retaliation or potential retaliation for reporting non-compliant activities must be reported directly to the CCO or the Compliance Line.
 - b. **Procedures that apply to management**
 - i. All levels of management must support this policy and encourage the reporting of problems and concerns.
 - c. **Procedures that apply to CCO:**

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- i. The CCO will be responsible for the investigation and follow-up of any reported retaliation against an employee.
 - ii. The CCO may report the results of an investigation into suspected retaliation to the President of Baptist Health and a committee of the Board of Trustees as appropriate.
- d. Enforcement**
 - i. Compliance with this policy is required for all employees and will be enforced according to appropriate Human Resource procedures.

References: N/A

Appendix: N/A