

**CATHOLIC CHARITIES OF THE
ROMAN CATHOLIC DIOCESE OF
SYRACUSE, NY
and
TOOMEY RESIDENTIAL AND COMMUNITY SERVICES**

***Compliance Plan
Reporting of Compliance Concerns***
6/2/08

PURPOSE:

Catholic Charities of the Roman Catholic Diocese of Syracuse, NY and its related entities including Toomey Residential [‘Charities’] 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 and state requirements, as well as the ‘Charities’ ethical and business policies.

To promote this culture, ‘Charities’ established a compliance reporting process and a strict non-retaliation policy to protect employees and others who report problems and concerns in good faith. Any form of retaliation, retribution or reprisal can undermine the compliance resolution process and result in a failure of the channel of communication within ‘Charities.’

POLICY:

1. All employees have an affirmative duty and responsibility for promptly reporting any known or suspected misconduct, including actual or potential violations of laws, regulations, policies and procedures, ‘Charities’ Corporate Compliance Plan or its Code of Ethics.
2. An “open-door policy” will be maintained at all levels of management to encourage employees to report problems and concerns.
3. Employees are required to report concerns to their immediate supervisor, the agency Compliance Officer, or to their agency executive director.
4. Should an employee want to report anonymously ‘Charities’ maintains a **Compliance Hotline (866) 460-2024 (toll-free)** to assure employees have the ability to report compliance concerns confidentially.
5. Any form of retaliation against any employee who reports a perceived problem or concern in good faith is strictly prohibited by law.

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.

PROCEDURES:

Procedures That Apply to All Employees:

1. Knowledge of misconduct, including actual or potential violations of laws, regulations, policies and procedures or 'Charities' Code of Ethics, must be reported to immediately to management, the Compliance Officer or the Compliance Hotline.
2. Confidentiality will be maintained to the extent that is practical and allowable by law. Employees should be aware that they are legally required to report certain types of crimes or potential crimes and infractions to external governmental agencies.
3. Employees may report their compliance concerns confidentially to the Compliance Hotline. Callers should be aware that, although all effort will be made to protect their anonymity, it may not be possible to do so if they identify themselves, provide other information that identifies them, the investigation reveals their identity or if they inform others that they have called the Compliance Hotline.
4. If the caller wishes to make the report anonymously to the Compliance Hotline, no attempt will be made to trace the source of the call or identify of the person making the call.
5. The Compliance Hotline number is included at compliance training, in the Corporate Compliance Plan and is published and visibly posted consistent with employee notification in locations frequented by 'Charities' employees.
6. 'Charities' will not impose any disciplinary or other action in retaliation against individuals who make a report or compliant in good faith regarding a practice that the individual believes may violate the 'Charities' Corporate Compliance Plan, Code of Ethics, its Compliance Policies and Procedures, or any of the laws, rules or regulations by which the 'Charities' is governed. "Good faith" means that the individual believes that the potential violation actually occurred as he or she is reporting.
7. 'Charities' strictly prohibits its employees from engaging in any act, conduct or behavior which results in, or is intended to result in, retaliation against any employee for reporting his or her concerns relating to a possible violation of the

'Charities' Corporate Compliance Plan, Code of Ethics, its Compliance Policies and Procedures, or any of the laws, rules or regulations by which the Agency is governed.

8. If an employee believes in good faith that he/she has been retaliated against for reporting a compliance complaint or concern or for participating in any investigation of such a report or complaint, the employee should immediately report the retaliation to the Compliance Officer or the Compliance Hotline. The report should include a thorough account of the incident(s) and should include the names, dates and specifics events; the names of any witnesses; and the location or name of any document that supports the alleged retaliation.
9. Knowledge of a violation or potential violation of this policy must be reported directly to the Compliance Officer or the Compliance Hotline.

Procedures that apply to Management:

Management must take appropriate measures to ensure that all levels of management support 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:

- Meet with department staff and discuss the main points within this policy
- Provide all department staff with a copy of this policy

Procedures that apply to the Compliance Officer or Designee:

1. The area Compliance Officer will be responsible for the investigation and follow-up of any reported retaliation against an employee for reporting a compliance concern or participating in the investigation of a compliance concern. If there is a perceived or actual conflict of interest with the Corporate Compliance Officer's conducting a particular investigation, they will, in consultation with management, select another individual to conduct the investigation. The appointed investigator will assume the role of the Compliance Officer that is delineated below Procedure #2.
2. The area Compliance Officer or designee will report the results of an investigation into suspected retaliation to the Executive Director and the Corporate Compliance Committee. The Executive Director will advise the Board of Directors as applicable.