Care N' Care Insurance Company of North Carolina, Inc. Policy

Policy Title Non-Retaliation / Non-Retribution			
Department Responsible Compliance and Integrity	**Policy Code** HTA – 1.40	**Effective Date** March 2016	**Next Review Date** December 2020
Title of Person Responsible Chief Compliance Officer	**Approval Council** CNC-NC Policy Goverance Committee		**Approved Date** March 10, 2016

PURPOSE

Care N' Care Insurance Company of North Carolina, Inc. ("CNC-NC") understands a strong compliance, ethics and integrity program is core to developing accountability and transparency. CNC-NC is committed to maintaining a culture that promotes the prevention, detection, and resolution of instances of conduct that do not conform to laws, regulations, policies, and procedures, or to the CNC-NC Code of Conduct.

CNC-NC is committed to encourage and enable good-faith reports by its employees, members of the Board of Directors (when acting on behalf of CNC-NC), first tier, downstream and related (FDRs) entities, contractors, and all agents of the CNC-NC (workforce) of observed or suspected misconduct or non-compliance with applicable laws and regulations, without fear of retaliation, retribution or intimidation for reports made in good faith.

DEFINITIONS, INITIALS, ACRONYMS

Covered Individual: see definition of Harassment.

Harassment: means unwelcome verbal, physical or visual conduct that is based upon a person's protected status, such as sex, age, race, color, religion, national origin, disability, citizenship, veteran status, or other protected group status.

Intimidation: means illegal sexual harassment and discrimination.

Protected Activity: means for example an employe who requests a reasonable accommodation based upon religion or disability, participation in employee investigations or discrimination proceedings, or opposition to a practice believed to be discrimination as long as it is based on a reasonable good faith belief.

Retaliation: means an action taken for offense or injury such as when an employer takes an adverse action against a covered individual because they engaged in a protected activity.

Retribution: means the punishment that someone receives as revenge for his committing a criminal act.

POLICY
Retaliation, retribution or intimidation against its workforce, who makes a good faith report regarding potential misconduct or non-compliance, is prohibited. (See C.F.R. §§ 422.503 (b)(4)(vi)(A), 423.504(b)(4)(vi)(A))

RESPONIBILITIES
It is the responsibility of each member of workforce to abide by this policy.

1. Knowledge or suspicion of misconduct, violations of law, or other wrongdoing must be immediately reported to CNC-NC management or CNC-NC Compliance and Integrity Department.

2. CNC-NC has a variety of mechanisms including anonymous reporting of potential or acutal non-compliance. It is recommended to discuss the issue first with a supervior. If it is more comfortable, individuals may contact the Compliance and Integrity Department Helpline at 855.741.4518, visit hta.ethicspoint.com, or by sending correspondence to:

   Attention: Thomas Wilson, CNC-NC Chief Compliance Officer
   7800 McCloud Road, Suite #100
   Greensboro, NC 27409

3. No one will be disciplined solely on the basis that he/she reported what was reasonably believed to be an act of wrongdoing or a violation of the Code of Conduct, law, or other regulatory requirement.

4. Anyone engaging in retaliation, retribution or intimidation will be subject to disciplinary action up to and including termination of employment or contract.

5. Disciplinary action up to and including termination of employment or contract will be taken if CNC-NC reasonably concludes that the report of wrongdoing was knowingly fabricated, distorted, exaggerated, or minimized to either injure someone else or to conceal his/her own wrongdoing.

6. CNC-NC Management must assure their employees that CNC-NC expects timely reporting of suspected compliance violations in an atmosphere free from retaliation, retribution, or intimidation.

REFERENCE DOCUMENTS/LINKS
United States Equal Employment Opportunity Commission

ATTACHEMENT
N/A

PREVIOUS REVISION/REVIEW DATES

Date	Reviewed	Revised	Notes
N/A	N/A	N/A	This is a new policy.
July 2017	X	N/A	
November 2017	X	Yes	Included mechinans for reporting.
December 2018	Yes	Yes	Removed reference to HTA.
11/22/19	Yes	Yes	Included specific reference to "intimidation" per the CFR and definitions of harassment, intimidation, retaliation and retribution.