

Non-Retaliation/Non-Retribution

Policy Title Non-Retaliation / Non-Retribution			
Department Responsible Compliance and Integrity	Policy Code HTA – 1.40	Effective Date March 2016	Next Review Date November 2018
Title of Person Responsible Chief Compliance Officer	Approval Council CNC-NC Policy Governance 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 entities (FDRs), 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 or retribution for reports made in good faith.

DEFINITIONS, INITIALS, ACRONYMS

N/A

POLICY

Retaliation or retribution against its workforce, who makes a good faith report regarding potential misconduct or non-compliance, is prohibited.

RESPONSIBILITIES

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 to report potential or actual non-compliance. It is recommended to discuss the issue first with a supervisor. 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 or retribution 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 harassment.

REFERENCE DOCUMENTS/LINKS

N/A

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 mechanisms for reporting.
December 2018	Yes	Yes	Removed reference to HTA.