



Applies To:	Employees, Contractors, Vendors, Board Members
Topic: Corporate Compliance	Non-Retaliation, Non-Intimidation
Issue Date	February 27, 2009
Revision	May 2012, Dec 2012, Nov 2013, Nov 2014, Jan 2016, Dec 2016

Definition: **Retaliation:** to take retributory action

Intimidation: is intentional behavior that "would cause a person of ordinary sensibilities" fear of injury or harm

Purpose: This Non-Retaliation, Non-Intimidation Policy is intended to encourage and enable employees and others to raise serious concerns within INSPIRE prior to seeking resolution outside the organization. It is not intended to be used by employees when given legitimate constructive criticism regarding their position.

Retaliation/Intimidation

Inspire will not permit any intimidation or retaliation, or negative or adverse actions to be taken upon any employee, service partner, board member or vendor for making a good faith report of suspected violations of the Code of Conduct, suspected or potential fraud or issues of non-compliance. This Non-Intimidation Non Retaliation policy protects stakeholders for good faith participation in the compliance program including reporting suspected issues, assisting in an investigation, participating in self-evaluations, audits and remedial actions, and reporting to appropriate officials as provided in Sections 740 and 741 of the New York State Labor Law.

Under New York State Law, INSPIRE management may not retaliate against or intimidate employees, vendors, contractors, or board members who disclose to Inspire Management, the Corporate Compliance Officer or public body an issue of health care fraud or non-compliance. This law also provides protections for INSPIRE against employees, vendors or board members who bring an action under the law without basis or fact.

Report Concerns or Complaints

Retaliation or intimidation in any form will not be tolerated. Any act of alleged retaliation or intimidation should be reported immediately to the HR Department and will be promptly investigated. An employee who retaliates against or intimidates someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.