	Department: Corporate Compliance	Policy No.: 101
	TITLE: REPORTING POTENTIAL ISSUES OR AREAS OF NON-COMPLIANCE POLICY	
Effective Date: 1/1/15	Revised: 1/1/15	

REPORTING POTENTIAL ISSUES OR AREAS OF NON-COMPLIANCE POLICY

SCOPE:

All Ascension At Home, LLC colleagues. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time associates, independent contractors, clinicians, officers and directors.

PURPOSE:

Ascension At Home, LLC (“the Company”) has adopted this Reporting Potential Issues or Areas of Non-Compliance Policy to provide an overview of the responsibilities of both colleagues and the Ethics & Compliance Department have to ensure the Company operates within the parameters of all applicable healthcare laws and regulations.


POLICY AND PROCEDURE:

I. INTRODUCTION

Adherence to the Corporate Ethics & Compliance Program is vital. Accordingly, violations of law or the Program will not be tolerated. Violators will be subject to corrective action in accordance with any applicable collective bargaining agreements and other applicable procedures of the Company. Management is responsible for ensuring that colleagues are aware of and adhere to the provisions of the Company’s Code of Business Conduct & Ethics manual (the “Code”) and the Company Ethics & Compliance Program. For clarification or guidance on any point either in the Code or the Ethics & Compliance Program generally, please contact a member of the Ethics & Compliance Department.

II. DUTY TO REPORT AND COMPLIANCE OFFICER INVESTIGATIONS

Colleagues are expected to report any suspected violations of the Code, Ethics & Compliance Program, or other irregularities to their supervisor, manager, or a member of the Ethics & Compliance Department. If the colleague wishes to remain anonymous or has exhausted all other reporting options, that colleague may submit his/her report through the Company Ethics and Integrity Helpline, 1-877-835-5267. This reporting line number shall be posted in all Company administrative and operations sites. All reports must contain sufficient information for the Ethics & Compliance Department to investigate the concerns raised. No adverse action or retribution of any kind will be taken by the Company against a colleague solely because he or she reports in good faith a suspected violation of the Code, Ethics & Compliance Program or other irregularity by any person other than the reporting colleague. The Company will attempt to treat such reports confidentially and to protect the identity of the colleague who has made a report to the maximum extent consistent with fair

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and rigorous enforcement of the Code and the Program.

Any manager, supervisor, or other high-ranking colleague who receives a report of a suspected violation or irregularity shall contact a member of the Ethics & Compliance Department.

Upon receipt of the suspected Code or compliance violation, the Ethics & Compliance Department shall immediately begin a detailed investigation. The investigation by Ethics & Compliance personnel shall include interviews and the review of relevant documents. If the Company Chief Compliance Officer believes that the integrity of an investigation may be compromised because of the presence of colleagues under investigation, the colleague(s) allegedly involved in the misconduct may be removed from his/her present work activity, with or without pay, pending the outcome of the investigation, and after consultation with the Chief Compliance Officer and relevant management personnel.

The Ethics & Compliance Personnel will strive to keep all concerns/complaints confidential to the extent it is possible to do so.


III. CORRECTIVE ACTION

The Ethics & Compliance Department will work with managers and supervisors to inform any colleague of allegations that may have been filed against him or her arising from the Program. Such notification may be delayed pending the outcome of any internal investigation the Chief Compliance Officer deems appropriate. The colleague will be given the opportunity, as appropriate; to state his or her position before any corrective action is imposed.

If the Ethics & Compliance Department determines that a colleague, agent, or independent contractor has clearly violated the law, Code or Ethics & Compliance Program, that colleague, agent, or independent contractor shall be subject to appropriate corrective action as determined by the immediate supervisor, and Human Resources Department.

The extent of the corrective action will depend on the seriousness of the offense. A record of the event and the corrective action imposed shall be maintained in the colleague's personnel file.

Corrective action will be taken against a violator's manager(s) or supervisor(s) to the extent that circumstances reflect inadequate supervision or a lack of due diligence. In addition, managers and supervisors may be sanctioned for failing to detect non-compliance with applicable policies and legal requirements, where reasonable diligence on the part of the manager or supervisor would have led to the discovery of any problems or violations and given the Company the opportunity to correct them earlier. A record of the event and the discipline imposed against the manager or supervisor shall be maintained in the colleague's personnel file.

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IV. RETALIATION

Retaliation will not be tolerated against any colleague. Corrective action will be taken against any colleague who retaliates, directly or indirectly, against a colleague who makes a good faith report of a violation of law, Code or the Ethics & Compliance Program.

V. POLICY REVIEW

The Ethics & Compliance Department will review and update this Policy and all when necessary in the normal course of its review of the Corporate Ethics & Compliance Program.