

24-Hour Compliance Line Notification

PURPOSE:

To provide guidelines to all Shepherd Center and affiliates staff on the use of the Ethics in Business Compliance Hotline (the "Compliance Hotline").

POLICY:

It is the policy of Shepherd Center for all employees, agents, contractors and vendors to report any ethical concerns and/or suspected fraud or abuse activities to one or more of the following: a Supervisor, Manager, Director, Vice-President, the CEO, the Chief Compliance Officer or through the Compliance Hotline.

RESPONSIBILITY:

1. It is the responsibility of the Chief Compliance Officer to ensure that all Executive Management and Senior Management are completely knowledgeable in the operation and use of the Compliance Hotline.
2. It is the responsibility of Senior Management to ensure that all staff under their direction understand the availability and use of the Compliance Hotline.

PROCEDURE:

1. All employees of Shepherd Center and affiliates will be trained in the use of the Compliance Hotline, as well as given a card with number and information. The Compliance Hotline number will be posted throughout employee areas and on bulletin boards.
2. During employee orientation and at such other times as may be appropriate, employees will be provided with information (e.g., a Compliance Hotline business card) that indicates the various ways to contact the Compliance Hotline. The Compliance Hotline can be contacted via telephone, internet website or QR code.
3. Employee may call or contact the Compliance Hotline at any time 24 hours a day from any telephone or computer anywhere in the United States **toll free**. The toll free phone number is (800) 860-0085 and the applicable internet website is saysomethingshepherd.ethicspoint.com.
4. The employee may contact the Compliance Hotline to reach a trained communication specialist, who is employed by an independent third-party vendor retained by Shepherd Center to monitor our Compliance Hotline. This individual, who has no affiliation with Shepherd Center, will accept, debrief, document and report all incoming compliance line calls.
5. Employees may choose either to give their name and position or they may remain anonymous at which point they will be given a control number.
6. Calls dealing with issues other than business compliance (e.g., Payroll, Human Resources, etc.), may be referred to the appropriate department when applicable.
7. All anonymous callers who use the Compliance Hotline will be given a follow-up date to call back to the Compliance Hotline to receive a response from Shepherd Center on the caller's concerns.
8. The Compliance Department shall keep a log of all Compliance Hotline matters, including any applicable resolution or outcome of the given matter.

ANONYMITY:

If the Compliance Department determines that an anonymous call cannot be investigated without additional information, the Chief Compliance Officer will determine what appropriate action may be taken. Appropriate action may consist of informing our independent third-party vendor that insufficient information has been provided and the identification of the additional information required. Until the additional information is provided, the case will ordinarily be closed.