



Policy and Procedure # 122

Corporate Compliance Program

Approval: _____ Effective Date: 5/06/2024

POLICY: It is EFI's policy to deliver its services in an environment characterized by strict conformance with the highest standards of accountability for administration, Human Resources, Residential Services, Vocational Services, Marketing, and Financial Management.

To preserve and enhance EFI's reputation, everyone associated with EFI, including its Board members, Directors, Supervisors and employees must share a commitment not only to EFI's mission statement but also to compliance with the numerous laws, regulations, and policies that govern EFI's conduct.

The compliance policy is composed of three basic elements:

- a) Code of Conduct for all EFI staff, supervisors
- b) Whistle-Blower Policy
- c) Records of Retention Policy

PROCEDURE:

1. The Executive Director with the approval of the Board will name a Corporate Compliance Officer who will coordinate the development, implementation and monitoring of a Corporate Compliance Plan for the agency.
2. EFI employees and Board Members are strongly encouraged to report any concerns regarding violations of EFI's Code of Conduct to the attention of their supervisor or the Compliance Officer. Reports may be made in person, in writing, or over the telephone and will be treated as confidential and privileged to the extent of the law. Reports may be made anonymously but EFI encourages the reporting individual to provide his or her name to assist with conducting a thorough investigation.
3. The Compliance Officer will serve as a resource to management and employees and will conduct investigations as determined by the Executive Director.
4. Upon conclusion of the investigation, Management, the Compliance Officer and Executive Director will determine if any follow-up action is to be taken.