



Department: Compliance	Version #: 1
Policy Title: Non-intimidation and non-retaliation	
Process Owner: Chief Compliance Officer	Created Date: 3/3/2022 Last Reviewed Date: 2/1/2023
Document Type: Policy	Approver(s): Policy Review Committee
References: 42 CFR 422.503(b)(4)(vi)(A)(7)	Date Approved: 3/22/2022

Printed copies are for reference only. Please refer to the S/Policies and Work Instructions for the most recent version.

Purpose: As required under 42 CFR Part 422.503(b)(4)(vi)(A)(7).

Summary: Intimidation and/or retaliation is prohibited for good faith reporting of non-compliance.

Scope: ATRIO Employees

Definitions:

Employees: means any full-time employees, part-time employees, temporary employees and volunteers employed by ATRIO or Atrio Holding Company, and Independent contractors.

Policy: This policy forbids intimidation and/or retaliation of any kind for good faith participation in the compliance program, including but not limited to reporting potential issues, investigating issues, conducting self-evaluations, audits and remedial actions, and reporting to appropriate officials.

Procedure: Any reported or known retaliation or intimidation in violation of this policy shall be investigated and violators shall be subject to Compliance and Human Resources disciplinary standards, up to and including termination of employment.

Resources:

ATRIO Disciplinary Standards Policy, ATRIO Employee Handbook, ATRIO Code of Conduct, ATRIO Compliance Program.