



Standard Operating Policies – SOP # 7

Non-retaliation

Title:	Non-retaliation Policy	Effective Date:	11/10/2003
Author:	Chief Compliance Officer	Last Review Date:	12/01/2021
Location:	All Locations	Last Revision Date:	12/01/2021
Functional Area:	ADMINISTRATION		

POLICY

The U.S. Office of Inspector General (OIG) believes that organizations should protect individuals from retaliation if they report potential compliance-related violations. Any form of retaliation against any Liberty Workforce member who reports a perceived problem or concern in good faith is strictly prohibited. Any Workforce member who commits or condones any form of retaliation will be subject to discipline up to, and including, termination. Fear of retaliation against reporters or whistleblowers will seriously limit the effectiveness of reporting mechanisms for corporate compliance issues. Any form of retaliation or retribution can undermine the problem resolution process and result in a failure of communication channels within Liberty.

PROCEDURE

1. **Procedures that apply to all staff:**

Liberty has established a problem resolution process and a strict non-retaliation policy to ensure that Workforce members who report compliance problems and concerns in good faith will not be subjected to retaliation or harassment as a result of their reports. Retaliation related to reporting of compliance concerns is prohibited and anyone who engages in such prohibited activity will be subject to disciplinary action. Concerns about possible retaliation or harassment should be reported to the Chief Compliance Officer (CCO). All Liberty Workforce members have an affirmative duty and responsibility for reporting perceived misconduct, including actual or potential violations of laws, regulations, and Liberty’s Code of Conduct. Knowledge of misconduct, including actual or potential violations, will be immediately reported to the traditional chain of command, directly to the CCO, or to the Employee Help Line.

- Workforce members are encouraged to utilize the Employee Help Line. In furtherance of their protection against retaliation, callers may remain anonymous.
- Workforce members may also proceed up the chain-of-command or communicate with the Human Resources Department if their problem or concern is not resolved.
- All compliance issues will be documented and forwarded to the CCO. Workforce members cannot exempt themselves from the consequences of their own misconduct by reporting the issue, although self-reporting may be taken into account in determining the appropriate course of action.

2. **Procedures that apply to management.**

Liberty maintains an “open-door” policy at all levels of management (which includes the CCO, Executives, Vice Presidents, Directors, site Managers and Supervisors) to encourage Liberty Workforce members to report compliance problems and concerns.

Management must take appropriate measures to ensure that all levels of management support this policy and encourage the reporting of problems and concerns. At a minimum, the following actions should be taken and become an ongoing aspect of the management process:

- Meet with Workforce members and discuss the main points of the Compliance Program;

3. Procedures that apply to the CCO:

Any indication of a violation of the nonretaliation policy will be taken with great seriousness and will be investigated immediately by the CCO. The CCO will be responsible for conducting the investigation of the alleged retaliation and follow-up of any reported retaliation against a Workforce member. The CCO will report the actions taken and results of any investigation into suspected retaliation to corporate management as soon as possible.

Approved By: _____

Revision History

Version	Date	Author	Summary of Changes
#1	11/10/2003	Judith Ann Shields	Initial ISF release – refactor and update of previous security policies into distinct documents
#2	08/20/2004	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#3	01/18/2005	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#4	12/22/2006	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#5	12/22/2007	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#6	12/22/2008	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#7	11/15/2009	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#8	8/20/2010	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#9	01/18/2011	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#10	12/22/2012	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#11	12/22/2013	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#12	12/22/2014	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#13	11/15/2015	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#14	08/20/2016	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#15	12/22/2017	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement

#16	12/22/2018	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#17	11/13/2019	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#18	11/03/2020	Judith Ann Shields	Annual review, Attorney reviewed © LHC, Author Title not name, Policy Title. Added inactivity lock requirement
#19	12/01/2021	John Beck	Annual review, minor changes and clarifications. Added inactivity lock requirement