

**GATEWAY-LONGVIEW, INC.**  
**WHISTLEBLOWER POLICY**

**Purpose**

Gateway-Longview is committed to high standards of ethical, moral, and legal conduct as well as fostering a culture of compliance. In line with this commitment, and Gateway-Longview's commitment to open communication, this policy aims to provide an avenue for employees to raise compliance concerns as well as to be reassured that they will be protected from harassing or intimidating responses.

Gateway-Longview's Whistleblower Policy procedures are intended to be used for serious and sensitive issues including those relating to financial reporting, unethical or illegal conduct or behavior.

**Safeguards**

*Non-Harassment* – Gateway-Longview does not tolerate the harassment of those who report compliance concerns and any such harassment should be reported immediately to the Corporate Compliance Officer.

*Non-Intimidation*-Gateway-Longview does not tolerate the intimidation of those who report compliance concerns and any such intimidation should be reported immediately to the Corporate Compliance Officer.

*Non-Retaliation*-Gateway-Longview will not retaliate against an employee who, in good faith, has made a protest or raised a complaint against some practice of Gateway-Longview, or of another entity or individual with whom Gateway-Longview has a business relationship, on the basis of a reasonable belief that the practice is in violation of law or a clear mandate of public policy.

*Confidentiality* – When reporting anonymously via the whistleblower hotline confidentiality can be assured while the confidentiality of all reports will be maintained according to Gateway-Longview's Investigation and Resolution of Compliance Concerns Policy.

*Bad Faith Allegations* – Allegations in bad faith may result in disciplinary action up to and including termination.

**Process for Submitting a Whistleblower Report**

*Reporting* –may be made to the following:

- Corporate Compliance Officer, Pamela Rouse (783-3224; [prouse@gateway-longview.org](mailto:prouse@gateway-longview.org))
- Board of Directors Audit and Compliance Committee Chair, Tracy Meyer
- The Whistleblower Hotline:
  - By Phone: 877-472-2110
  - E-mail: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)
  - Fax (215) 689-3885
  - By letter to: Lighthouse Services, Inc. (You must include Gateway's name in letter)  
1710 Walton Road, Suite 204, Blue Bell, PA 19422

**How the Report of Concern Will be Handled**

Reports will be fully investigated in consultation with the Board of Director Audit and Compliance Committee and, as needed, with legal counsel, according to Gateway-Longview's Investigation and Resolution of Compliance Concerns Policy. If an investigation of a reported concern finds that monies are owed to a funding source, repayment will be made according to the New York State Office of Medicaid Inspector General's guidelines as well as any applicable oversight agency guidelines.