

Whistleblower

The purpose of this policy is to encourage the good faith reporting of any concerns or complaints about possible wrongful conduct and to set forth Horizon's commitment to protecting those who make reports from retaliation.

Horizon requires its directors, officers, employees, student workers, interns, and volunteers, as well as all persons who provide Horizon with contracted services ("Representatives"), to observe high standards of business and personal ethics in the performance of their duties on Horizon's behalf.

Horizon is committed to protecting individuals from interference when making a "Protected Disclosure" (see definition below) and from retaliation for having made a Protected Disclosure or for having refused to follow an illegal instruction.

The principal objective of this Whistleblower Policy is to encourage and enable Horizon representatives, without the fear of retaliation, to raise "Concerns" (see definition below) regarding suspected unethical and/or illegal conduct or practices on a confidential and, if desired, anonymous basis, so that Horizon can address and correct inappropriate conduct and actions.

This policy is not intended to be the method for reporting violations of Horizon's applicable Employee Services policies, such as problems with colleagues, co-workers, or supervisors, or for reporting issues related to alleged employment discrimination or sexual or any other form of unlawful harassment, all of which should be handled in accordance with Policy 2.3: Sexual Harassment, Non-Discrimination and Anti-Harassment Policy and Complaint Procedure, found on Horizon's intranet (SharePoint).

Horizon will exercise its authority to take whatever action may be needed to prevent and correct activities that are found to constitute wrongful conduct.

Definitions

Wrongful Conduct Concern ("Concern")

A violation of Horizon policies such as its Code of Conduct; a violation of applicable local, New York State, and Federal laws; or the use of Horizon property, resources, or authority for personal gain or other non-Horizon-related purposes.

Protected Disclosure

Communication about actual or suspected wrongful conduct engaged in by a Horizon Representative (who is not also the disclosing individual) based on a good faith and reasonable belief that the conduct has both occurred and is wrongful under Horizon policies and/or applicable laws. Individuals who are aware of, or have reason to suspect wrongful conduct should report the conduct promptly.

Reporting Concerns

Concerns should be reported either verbally or in writing as soon as practicable to any one of the following:

1. Horizon's Compliance Officer
 - a. By telephone to 716-831-2700 x 1015
 - b. by letter to 55 Dodge Road, Getzville, NY 14068
 - c. by email to bbanach@horizon-health.org
2. Any member of Senior Management
3. Horizon's Confidential Reporting Line: 1-800-738-3059
4. The Chairman of the Board of the audit committee of Horizon's Board of Directors, Scott Weber, at sweber@mtb.com

Handling Reporting Concerns

Reports will be immediately sent to Horizon's Compliance Officer who, in consultation with the Legal Department, has the responsibility for investigating concerns.

Investigations

The Compliance Officer will attempt to notify the disclosing individual (when identity is known) to acknowledge receipt of the reported concern. All reports will be promptly investigated according to our Compliance Policy: *Investigation of Allegations of Staff Inappropriate, Unethical or Illegal Behavior*. Appropriate corrective action will be taken when warranted by the investigation.

Reporting Responsibility

It is the responsibility of all Horizon Representatives to report, in good faith, concerns they may have regarding actual or suspected activities which may be illegal or in violation of Horizon's policies with respect to, without limitation, fraud, theft, embezzlement, accounting, or auditing irregularities, bribery, kickbacks, and misuse of Horizon's assets, as well as any violations or suspected violations of our business and personal ethical standards.

No Retaliation

No Horizon Representative who in good faith reports a concern shall suffer intimidation, harassment, retaliation, discrimination, adverse employment consequences, including threats adversely affecting current or future employment, or threatening to contact U.S. citizenship or immigration authorities regarding the representative or a member of their family or household because of such report. Any employee of Horizon who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including termination of employment.

Acting in Good Faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing that the information disclosed may indicate a violation of a law, Horizon policy and/or ethical standards. Any allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Horizon takes seriously its responsibility to enforce this Policy, and therefore encourages any person reporting a concern to identify themselves so as to facilitate any resulting investigation. Notwithstanding the foregoing, in reporting a concern, Horizon representatives can request that their report be treated in a confidential manner (including that Horizon takes reasonable steps to ensure that the identity of the reporting person remains anonymous). Concerns will be kept confidential to the extent possible, consistent with the need to conduct a thorough and complete investigation.

Records

Horizon will retain on a strictly confidential basis all records relating to any reported Concern and to the investigation and resolution thereof in accordance with our Record Retention policy. All such records are confidential to Horizon, and such records will be considered privileged and confidential.

** This policy, formerly only embedded in our Code of Conduct, also became a stand-alone policy as of January 2022.*

Policy Author's Name: Megan Landreth

Policy Approver: Chief Compliance Officer

Reviewed:	1/1/20	3/20/23	2/28/24			
Revised:	3/28/23	1/5/23				