

 ROSWELL PARK CANCER INSTITUTE	Roswell Park Cancer Institute Policy and Procedure	Date Issued: 10/1/2006	Number: 103.1
Title: Non-Retaliation Policy	Revision: 6	Effective Date: 10/23/2017	
Prepared by: Corporate Compliance Officer	Approved by: Michael B. Sexton, General Counsel	Page: 1 of 2	

A. GENERAL STATEMENT OF POLICY

It is the goal of the Roswell Park Cancer Institute (RPCI) Corporate Compliance Program to promote the highest standards of ethical and legal conduct. Every RPCI board member, employee, volunteer, student and trainee is required to uphold the principles and procedures of the Corporate Compliance Program. RPCI prohibits retaliation, intimidation, retribution or harassment against employees who, in good faith, report their compliance concerns.

B. SCOPE

This policy and procedure applies to all RPCI employees, board members, volunteers, students, and trainees (RPCI Workforce).

C. ADMINISTRATION

This policy and procedure will be administered by the RPCI Corporate Compliance Office through all departments.

D. POLICY / PROCEDURE

1. RPCI's compliance program encourages open and candid discussions of employee problems and concerns. Employees are responsible for promptly reporting actual or potential wrongdoing, including an actual or potential violation of a law, regulation, policy or procedure, or unethical behavior. In fact, **failure** to report known violations may be grounds for disciplinary action.
2. Members of the RPCI workforce with knowledge of actual or potential wrongdoing, misconduct, or violations of the compliance plan, or who have a concern or problem regarding compliance are to report immediately to at least one of the following internal resource, including:
 - a. The employee's supervisor
 - b. Any manager or administrator
 - c. RPCI's Compliance Officer by email to kathy.mastrobattista@roswellpark.org; or by telephone 845-8413, or
 - d. The RPCI Corporate Compliance **HOTLINE at 845-3566**
 - e. Employee and Labor Relations Office
 - f. For academic matters, the Department of Educational Affairs

3. Members of the RPCI workforce who report problems or concerns in good faith will be protected from retaliation, intimidation, retribution or harassment.
4. Members of the RPCI workforce who engage in retribution, intimidation, retaliation or harassment or who intentionally make false reports will be subject to disciplinary action up to and including termination from employment in accordance with the terms of the collective bargaining agreements, if applicable.
5. Management staff and the Compliance Office maintain an "open door policy" to allow individuals to report problems or concerns.
6. Problems or concerns will be investigated promptly and in an appropriate manner.
7. The RPCI Compliance Hotline (845-3566) permits individuals to call anonymously or in confidence to report problems and concerns or to seek clarification of compliance-related issues.
8. Members of the RPCI workforce cannot exempt themselves from the consequences of wrongdoing by self-reporting, although self-reporting may be taken into account in determining the appropriate course of action.
9. Confidentiality regarding employee concerns and problems will be maintained at all times insofar as legal and practical, informing only those personnel who have a need to know.

E. DISTRIBUTION

This Policy and Procedure will be distributed to all RPCI Managers via the RPCI internal web page and to holders of backup hard copies of the manual. Managers are responsible for communicating policy content to pertinent staff.