Status **Active** PolicyStat ID **19152026**

Origination	04/2019	Owner	Ximena Restrepo: Compliance and Privacy Partner
Last Approved	12/2025		
Effective	12/2025	Area	Compliance
Last Revised	12/2025	Applicability	BCLH System
Next Review	12/2026		

Nonretaliation/Nonretribution Policy, A333

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PURPOSE

To promote positive employee relations and morale in a working environment where ongoing open communication between supervisors and their employees occurs without fear of retaliation or retribution.

POLICY

1. Billings Clinic - Logan Health (BCLH) promotes a culture of compliance. BCLH does not intimidate or retaliate against employees, individuals, or others for:
    - Exercising any right under, or participating in any process established by federal, state, or local law, regulations, or policy;
    - Filing a complaint with the organization and/or government agency (e.g., Department of Health and Human Services – Office for Civil Rights).
    - Testifying, assisting, or participating in an investigation, compliance review, proceeding, or hearing; or
    - Opposing in good faith any act or practice made unlawful by federal, state, or local law, regulation, or policy, provided that the manner of the opposition is reasonable and does not itself violate law.
2. Employees are not permitted to engage in retaliation, retribution or any form of harassment against another employee for reporting compliance-related concerns.
3. Employees are responsible for promptly reporting actual or potential wrongdoing, including an actual or potential violation of law, regulation, policy, or procedure. The Compliance Department maintains an "open door policy" to allow individuals to report problems and

concerns. The Compliance Department acts upon each concern promptly and appropriately.

PROCEDURE

Prompt Reporting and Mechanisms

Knowledge of actual, suspected or potential wrongdoing, misconduct, or violations of the compliance plan must be promptly reported to management, the Compliance Department, and/or the Hotline/ Integrity Helpline.

Management expectations:

All managers and supervisor must take measures to encourage their staff to report problems and ensure staff they will not be disciplined for doing so. The following actions are taken:

- Senior management educates managers on this policy, including the proper treatment of employees and the creation of a work environment that facilitates open communication;
- Post this policy on employee bulletin boards; and
- All employees will review aspects of nonretaliation/nonretribution during annual general Compliance and Code of Conduct training.

Employee's expectations:

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If employees have concerns, they should be addressed in the following order:

1. Immediate supervisor
2. Department manager
3. Department director
4. Chief Compliance Officer
5. Chief Executive Officer

If an employee feels uncomfortable with the above or feels that the concern is not being addressed, the employee may report concerns directly to the Chief Compliance Officer, Compliance Department, or directly to the third-party Hotline/Integrity Helpline (anonymous option available), by phone at 1844-760-5833 or portal: www.mycompliancereport.com/LOGAN.

Investigations and Corrective Actions

All reports of retaliation are investigated thoroughly and expeditiously. All instances of retaliation, retribution, or harassment against reporting employees will be brought to the attention of the Compliance Department who will, in conjunction with Human Resources, investigate, and determine the appropriate discipline, if any. Confidentiality will be honored but it is not absolute. Information is shared on a "need-to-know" basis with those directly involved in the investigation and resolution process.

Potential steps to protect the employee may include taking paid leave, reassignment to other duties, or locations. Employees who report concerns in good faith will not be subjected to retaliation, retribution, or harassment. However, employees that come forward about their own actions or misconduct, cannot

exempt themselves from the consequences, but self-reporting will be considered in determining the appropriate disciplinary action.

Common Examples of Retaliation

At a high level, retaliation is an unfair or adverse action against an employee performed by a person of power (manager, supervisor, administrator, etc.) in response to that employee's engaging in a protected activity, such as reporting a concern. This may include, but not limited to:

- Job demotion/termination
- Harassment / intimidation
- Reassignment to less desirable duties (impacting earnings or pay)
- Denied promotion or other growth opportunities
- Excessive micromanagement (e.g., supervisor looking for mistakes, creating, or supporting a hostile environment)
- Creating a retaliatory environment by failing to address hostility or exclusion.
- Falsely accusing employee of poor performance
- Excluding employee from activities as a way of punishment for speaking out against wrongdoing
- Violation of other employee rights

These examples are illustrative and not exhaustive. BCLH remains dedicated to thoroughly looking into all reports of retaliation and upholding a safe, respectful, and compliant work environment for every employee.

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REFERENCE

Code of Conduct

Hotline/Integrity Helpline Policy

Approval Signatures

Step Description	Approver	Date
BC Policy Committee	Patti Reisinger: CHIEF COMPLIANCE OFFICER	12/2025
Policy Committee	Kelly Stimpson: Associate General Counsel	12/2025
Owner	Ximena Restrepo: Compliance	10/2025

Applicability

Billings Clinic, Logan Health (locations excluding LHMC), Logan Health Chester, Logan Health Conrad, Logan Health Cut Bank, Logan Health Medical Center, Logan Health Shelby, Logan Health Whitefish

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