



# Whistleblower Protection Policy

*Version:*

*November 18, 2016*

## Background and Application

CommonWell Health Alliance, Inc. (“CommonWell”) is committed to the highest standards of ethical, moral and legal business conduct. This Whistleblower Protection Policy (this “Policy”) is intended to encourage and enable employees and others to raise potential Violations (as defined below) to the appropriate CommonWell representatives, so that CommonWell can assess, address, and when appropriate, correct Violations. This Policy supplements but does not replace any applicable procedures required by applicable law or regulations.

This Policy applies to CommonWell employees, Members, Member representatives, volunteers, contractors, officers and Directors, each of whom shall be entitled to protection (each a “Protected Person”). Member representatives include Member full-time, part-time, temporary, or contract employees, working on behalf of such Member with CommonWell.

## Reporting Credible Information

A Protected Person is encouraged to report information relating to fraudulent, dishonest or illegal conduct or violations of law, regulations, or CommonWell policies (a “Violation”) that such person in good faith has reasonable cause to believe exists. Potential violations are to be reported to CommonWell’s Executive Director (identified below), unless the complaint relates to the Executive Director, in which case the complaint shall be made to the representative of the Board of Directors (the “Board Representative”) identified below. Questions related to this Policy and matters relating to the Board Representative and the Executive Director may alternatively be directed to CommonWell Legal Counsel (identified below).

Anyone reporting a Violation or suspected Violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a Violation. The individual submitting the complaint must provide all credible information of which they are aware. Any allegations that prove not to be substantiated and which prove to have been made maliciously, in bad faith, or known to be false will be viewed as a serious offense, and CommonWell may pursue all appropriate remedies.

## Investigation

The Executive Director shall promptly investigate each complaint and prepare a written report to the CommonWell Board of Directors (the “Board”), or if the complaint is made to the Board Representative, the Board shall appoint a non-interested individual (who may be a member of the Board of Directors or CommonWell’s legal counsel) to investigate the complaint and prepare a written report. The Executive Director or Board Representative, as applicable, will notify the person who submitted a complaint and acknowledge receipt of the complaint. If the complaint is submitted anonymously, then

it may not be possible to provide such acknowledgment. The Executive Director (or, if applicable, the Board Representative) in receiving and investigating the complaint and additional information shall endeavor to protect the confidentiality of all persons entitled to protection. Appropriate corrective action will be taken if warranted by the investigation, at the discretion and direction of the Board.

## Confidentiality and Anonymous Reporting

CommonWell encourages anyone reporting a Violation to identify themselves when making a complaint in order to facilitate the investigation of the Violation. Alternatively, complaints may be submitted anonymously by mailing a detailed written statement anonymously to CommonWell's Board Representative.

Reports of potential Violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable CommonWell or law enforcement to conduct an adequate investigation.

## Protection from Retaliation

No Protected Person will be subjected to retaliation, intimidation, harassment or other adverse action for reporting information in accordance with this Policy. Any Protected Person who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation of, and in accordance with, this Policy. Any individual within CommonWell who retaliates against another individual who has reported a Violation in good faith or who, in good faith, has cooperated in the investigation of a Violation is subject to appropriate discipline, including termination of employment with, or participation with CommonWell. The Policy is in addition to any non-retaliation requirements required by law or regulation.

## Compliance Contacts

Executive Director

Jitin Asnaani  
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Phone: 617-396-4009  
e-Mail: [Jitin@commonwellalliance.com](mailto:Jitin@commonwellalliance.com)

Or via <http://www.commonwellalliance.org/contact-us/>

## Board Representative

Scott Schneider, CommonWell Chairman of the Board

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## CommonWell Outside Counsel

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