**Horizon’s “Whistleblower” Policy Regarding**

**Possible Regulatory Compliance and Ethics Violations**

Horizon is committed to adhering to all regulatory, ethical and professional standards and requirements associated with the delivery and management of our services to our patients and other stakeholders. These requirements are described in Horizon’s “Code of Conduct” and the NYS Justice Center “Code of Conduct for Custodians of People with Special Needs” that all staff members attest to at hire and annually.

Horizon encourages all staff members to report all potential violations of these requirements internally and to the NYS Justice Center as mandated by regulation. The methods to report potential compliance violations are included in the Code of Conduct and include the options to report these potential violations anonymously, and to circumvent reporting to agency management via reporting directly to the Board of Directors. Procedures for reporting patient abuse, neglect and other clinical incidents internally and to the NYS Justice Center are included in written policies.

Horizon’s Chief Compliance Officer is empowered and responsible to protect staff members submitting violation reports from retribution by supervisors or other staff members with respect to promotions, assignments, compensation, or continued employment except in cases in which it is determined that a report was made with malicious intent.

Members of the community who have information regarding the violation of regulations or law by Horizon staff members, or possible abuse or neglect of patients by Horizon staff members are encouraged to contact Ms. Brenda John-Banach, Horizon’s Chief Compliance Officer at 716-831-2700, by letter at 3020 Bailey Avenue, Buffalo 14215, or by e-mail [BBanach@horizon-health.org](mailto:BBanach@horizon-health.org). Community members may alternatively contact Mr. Pete Grum, Chairman of our Board of Directors Audit Committee at 853-0802.