

Compliance Program

Grey Stone Laboratories, LLC



Policy Name	Compliance and Ethics Hotline & Whistleblower Protection			Document ID	CE-01
Effective	June 18, 2021	Last Revision	N/A	Version No.	1.0
Released by	Compliance Department		Author	Melissa Stokes (Compliance Officer)	
Applies to					
Group 1	Entire Workforce	Group 2	Business Associates	Group 3	Representatives

Revision History				
Version	Approved	Date	Description of Revisions	Author

Approval & Review

This policy has been reviewed and approved by the governing body of Grey Stone Laboratories on June 18, 2021.

Scope

This policy applies to all Grey Stone Laboratories employees, including part time, temporary, and contract employees.

Purpose

Grey Stone Laboratories is committed to the highest possible standards of ethical, moral, and business conduct. In conjunction with this commitment and Grey Stone Laboratories' commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that employees will be protected from reprisals or victimization for whistleblowing in good faith. However, if an employee feels that their anonymity is not required then they should report concerns directly to the Compliance Officer or to their direct supervisor/manager.

Policy Statement

This policy is intended to cover serious concerns that could have a large impact on Grey Stone Laboratories, such as actions that:

- May potentially violate laws and regulations, such as the False Claims Act, Anti-Kickback Statute, Stark Law, and other Fraud, Waste and Abuse laws.
- May not align with the company's code of conduct, mission, and policies.
- Otherwise amount to serious improper conduct.

Regular business matters that do not require anonymity should be directed to the employee's supervisor or manager, or directly to the Compliance Officer.

Safeguards

Safeguard	Description
Retaliation or Harassment	Retaliation or harassment made against any individual who reports, in good faith, compliance concerns through the Compliance and Ethics Hotline will not be tolerated.
Confidentiality	Every effort will be made to protect the reporter's identity by our hotline vendor. Please note that any information provided in a hotline report may be the basis of an internal/external investigation by the company into the issue being reported. It is possible that because of the information provided in a report the reporter's identity may become known to us during the course of our investigation.
Anonymous Allegations	This policy allows employees to remain anonymous at their option. Concerns expressed anonymously will be investigated to the best of our abilities.
Malicious Allegations	Malicious allegations may result in disciplinary action.

Policy Sections

Reporting

Toll-free Number: 855-222-3510

Website: www.lighthouse-services.com/greystonelaboratories

E-mail (must include company's name in report): reports@lighthouse-services.com

Reporters to the hotline can remain anonymous if they choose. Employment related concerns should continue to be reported through your supervisor or manager or through Human Resources.

The earlier a concern is reported, the easier it is for Grey Stone Laboratories to act. Although you are not expected to prove the truth of an allegation, the reporter should try to demonstrate in their report that there are sufficient grounds for concern.

Managing Reports and Investigations

The action taken will depend on the nature of the concern. The Compliance Officer receives all reports through the hotline and will provide copies (redacted, if necessary) to the governing body of Grey Stone Laboratories. Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

Whether reported directly through the hotline or to the Compliance Officer, the individual submitting the report will be given the opportunity to receive follow-up on their concern, such as:

- Acknowledging that the concern was received.
- Indicating how the matter will be dealt with.
- Giving an estimate of the time that it will take for a final response.
- Telling the reporting employee whether initial inquiries have been made.
- Telling the reporting employee whether further investigations will follow—and, if not, why.

The amount of contact between the individual submitting a report and the Compliance Officer investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the reporter.

At the discretion of the company and subject to legal and other constraints, the reporter may be entitled to receive information about the outcome of the investigation.

Related Documents and Publications

Internal/Published	Title
Internal	Duty to Report and Non-Retaliation
Published	Federal Sentencing Guidelines Manual, at http://www.uscourts.gov/guidelines-manual/guidelines-manual