



Administrative Policy: Whistleblower

I. SCOPE.

This policy applies to all New Hampshire Individual Health Plan Benefit Association, d/b/a New Hampshire Health Plan ("NHHP") directors, officers, full-time, part-time and temporary employees and those working for the NHHP on a contract basis.

II. PURPOSE.

NHHP is committed to the highest possible standards for ethical, moral and legal business conduct. In furtherance of this commitment and NHHP's commitment to open communication, this Policy provides an avenue for directors, officers, and employees to raise concerns and reassurance that they will be protected from retaliation or victimization for raising, in good faith, concerns or complaints that activities of NHHP or the action or inaction of its directors, officers, employees or contracted agents are improper or unlawful (such individuals being commonly referred to as "whistleblowers").

III. POLICY.

The whistleblower policy is intended to cover serious concerns that could have a significant impact on NHHP or its members, such as actions that:

- A. May lead to incorrect financial reporting;
- B. Are unlawful;
- C. Are not in conformance with NHHP's policies; or
- D. Otherwise amount to serious improper conduct.

IV. SAFEGUARDS.

- A. *Harassment, Retaliation, or Victimization.* Harassment, retaliation, or victimization of the complainant is strictly prohibited and NHHP will discipline appropriately any person determined to have engaged in such behavior.
- B. *Confidentiality.* NHHP will make reasonable efforts to protect the complainant's identity. Discussions and documentation regarding complaints will be kept in strict confidence to the extent appropriate or permitted by policy or law.
- C. *Anonymous Allegations.* Reports or complaints may be submitted anonymously or the person submitting such report or complaint may request to remain anonymous. Should a complainant desire to remain anonymous, that desire will be respected. It

is the policy of NHHP to encourage employees or agents to place their names on allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated, but consideration will be given to:

- (1). The seriousness of the issue raised;
- (2). The credibility of the concern; and
- (3). The likelihood of confirming the allegation from attributable sources.

D. *Malicious Allegations.* Malicious allegations by a complainant may result in disciplinary action.

V. PROCESS FOR RAISING A CONCERN.

A. *Reporting.* The whistleblower procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct should be submitted in writing, in a sealed envelope marked "Confidential", to:

Chair of the Board of Directors New Hampshire Health Plan
c/o Helms & Company, Inc.
1 Pillsbury Street, Suite 200
Concord, NH 03301

or

Audit Committee Chair
New Hampshire Health Plan
c/o Helms & Company, Inc.
1 Pillsbury Street, Suite 200
Concord, NH 03301

Any recipient of a report, concern or complaint made under this policy shall forward such report, concern or complaint to the Audit Committee of the NHHP.

- B. *Timing.* Prompt reporting is encouraged so that NHHP may investigate and intervene, if necessary, as quickly as possible.
- C. *Evidence.* Although the complainant is not expected to prove the truth of an allegation, the complainant needs to demonstrate to the person contacted that there are sufficient grounds for concern.

VI. HOW A COMPLAINT WILL BE HANDLED.

All complaints will be taken seriously and addressed promptly, discreetly and professionally. The action taken will depend on the nature of the concern. The Board of Directors receives a report on each complaint and a follow-up report on actions taken.

- A. *Initial Inquiries.* 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 action without the need for investigation.
- B. *Report to Complainant.* The complainant will be given the opportunity to receive follow-up on their concern in two weeks:
 - (1) Acknowledging that the concern was received;
 - (2) Indicating how the matter will be dealt with;
 - (3) Giving an estimate of the time that it will take for a final response;
 - (4) Telling them whether initial inquiries have been made; and
 - (5) Telling them whether further investigation will follow, and if not, why not.
- C. *Further Information.* The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant.
- D. *Outcome.* Subject to legal constraints, the complainant will receive information about the outcome of any investigations and the action, if any, to be taken by NHHP.

NHHP reserves the right to modify or amend this policy at any time as it may deem necessary. Questions regarding this policy may be addressed to the Chair of the Board of Directors or the Audit Committee Chair, at the address set forth for such individual above.