



HUMAN RESOURCES POLICY & PROCEDURES

DEPARTMENT: HR	POLICY NUMBER: 183
DISTRIBUTION: All Staff	EFFECTIVE DATE: February 25, 2009
SUBJECT: Whistleblower Reporting and Non-Retaliation	REVISION DATE: March 1, 2018

Policy Statement:

Equinox, Inc.'s Ethical Standards for Staff requires employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Equinox, Inc., staff must practice honesty and integrity in fulfilling responsibilities and complying with all applicable laws and regulations. It is the responsibility of all employees to comply with the Ethical Standards for Staff and to report violations or suspected violations in accordance with this Whistleblower Reporting & Non-Retaliation Policy.

A whistleblower as defined by this policy is an employee, officer, director, or volunteer of Equinox ("Protected Persons") who in good faith reports any action or suspected action that they consider to be illegal, fraudulent, or in violation of any adopted policy of Equinox. Protected Persons are not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities. For additional details, please review the Whistleblower Reporting & Not-Retaliation Policy.

No Retaliation

No employee who in good faith reports a violation or suspected violation of the Ethical Standards for Staff shall suffer harassment, retaliation or adverse employment consequences. An employee who retaliates against someone who has reported a violation or suspected violation in good faith is subject to discipline up to and including termination of employment. The Whistleblower Reporting & Non-Retaliation Policy is intended to encourage and enable Protected Persons to raise serious concerns within Equinox, Inc. prior to seeking resolution outside the Organization.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Ethical Standards for Staff must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Ethical Standards for Staff. Any allegations that prove not to be substantiated and which prove to have been

made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Procedure:

1. The Ethical Standards for Staff addresses Equinox’s open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee’s supervisor is in the best position to address an area of concern.

However, if staff is not comfortable speaking with their immediate supervisor or not satisfied with their supervisor’s response, staff are encouraged to speak with someone in the Human Resource Department or anyone in management or the Leadership Team. Supervisors and managers are required to report suspected violations of the Ethical Standards for Staff to the Equinox, Inc.’s Compliance Manager, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when staff are not satisfied or uncomfortable with following Equinox’s open door policy, employees should contact the Organization’s Compliance Manager directly.

2. Reports are encouraged to be made in writing so as to assure a clear understanding of the issue being raised. Oral reports are also accepted. All reports should be as specific as possible, including such information as: name of the individual or individuals involved, nature of the alleged unethical behavior, details as to how this knowledge was obtained, any written proof and names of others who are believed to be witnesses.
3. Complaints or concerns of illegal or unethical conduct may be submitted on a confidential basis by the complainant or may be submitted anonymously. Anonymous complaints must be in writing and submitted to the Compliance Manager. Complaints or concerns will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
4. All reports are to be given to the Compliance Manager. The Compliance Manager is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Ethical Standards for Staff and, at his/her discretion, shall advise the the Compliance Committee. The Compliance Manager has direct access to the Compliance Committee and the Board of Directors. The Compliance Manager is required to report to the Compliance Committee on compliance activity. For matters involving the Compliance Manager, a complaint can be reported directly to the Compliance Committee chair.
5. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.
6. If appropriate, findings will be shared with staff so that regulations, policies, and procedures can be updated and approved to reflect necessary changes or clarifications.
7. Once reported, any staff who feel they are being retaliated against for “blowing the whistle” shall immediately notify the CEO or Compliance Manager.