POLICY:

Health Quest Systems, Inc. and its’ affiliates (“HQ”) is subject to inquiries and investigation conducted by various government agencies. It is the policy of HQ to cooperate fully with any lawful investigation and to respond appropriately to such inquiries and investigations, while protecting its interests by asserting all relevant protections and privileges afforded by law. Accordingly, this policy covers:

1. Telephone calls or letters from a governmental official, representative, or investigator;
2. Presentation of demand letters, subpoenas, or search warrants;
3. On-site visits or inspections to HQ facilities;
4. Visits to the homes or other locations of current Workforce members, or other contacts, by a government official, representative, investigator, or other individual acting on behalf of the government.

A government investigation may be conducted on a civil and/or criminal basis, and may target HQ corporate entities and/or Workforce Members. HQ policy with respect to any government investigation is to require that the Chief Compliance Officer and the Office of Legal Services be notified immediately in accordance with policy procedures. Workforce members are always free to speak with government investigators or representatives from any federal or state agency, and should be truthful, cooperative, and polite. Once there has been notice of an investigation, the destruction of documents under the Record Retention Policy is suspended and no documents may be destroyed until notified otherwise by the Office of Legal Services. In furtherance of the foregoing, HQ should comply with the policy procedures.

REFERENCES:
HQ 5.1.12 Government Investigations Procedure
HQ 5.1.6 Document Retention and Destruction Policy

ENFORCEMENT:

All individuals whose responsibilities are affected by this process are expected to be familiar with the basic procedures and responsibilities created by this process. Failure to comply with this process will be subject to appropriate remedial and/or disciplinary action, up to and including termination of any employment or other relationship, in accordance with this process.
POLICY HISTORY:
Supersedes: 7/25/2019
Original Implementation Date: 2/27/2014
Date Reviewed: 7/21/2020

APPROVAL:

Policy Owner

Date