



Compliance Program

I. Standards of Conduct

BRC's fundamental principles and values are reflected in the following Standards of Conduct:

- BRC's officers, employees and staff are committed to providing high-quality care and services, at all times.
- BRC's officers, employees and staff shall adhere to all laws and BRC policies concerning the delivery of care and services.
- BRC's officers, employees and staff shall treat all clients, colleagues, supervisors, and supervised staff with respect.

BRC expects all affected individuals to:

- Act in accordance with the Standards of Conduct.
- Refuse to participate in any unethical or illegal conduct.
- Report any unethical or illegal conduct to the Compliance Officer.

II. Open Lines of Communication

All individuals whose duties affect BRC's risk areas may ask questions regarding compliance issues and may report compliance issues to the Compliance Officer through any of the following means. Individuals may submit reports anonymously, through the following platforms for reporting.

- Website: <https://www.lighthouse-services.com/brc>

Toll-Free Telephone:

- English-speaking USA and Canada: 833-985-5050
- Spanish-speaking USA and Canada: 800-216-1288
- E-mail: reports@lighthouse-services.com (must include name BRC with report)
- Fax: 215-689-3885 (must include name BRC with report)

Mail: Attn: Compliance Officer
Bowery Residents' Committee, Inc.
131 West 25th Street, 12th Floor
New York, NY 10001

Any person who reports a compliance issue shall be protected by BRC's policy for non-intimidation and non-retaliation, described below. Where a person identifies themselves when reporting a suspected compliance issue, BRC shall maintain the report as confidential, unless the matter is subject to a disciplinary proceeding, referred to, or under investigation by, the New York State MFCU, New York State OMIG, or law enforcement, or if disclosure is otherwise required by law.

III. Policy of Non-intimidation and Non-retaliation

BRC has a strict policy of non-intimidation and non-retaliation with respect to any individual who participates in the Compliance Program in good faith by, for example:

- Reporting potential compliance issues to the Compliance Officer or appropriate personnel.
- Participating in the investigation of a potential compliance issue.
- Performing a self-evaluation.
- Participating in an audit.
- Implementing remedial actions.
- Reporting any instance of intimidation or retaliation to the Compliance Officer or appropriate personnel.
- Reporting potential fraud, waste or abuse to an appropriate State or Federal agency.

If you have any questions regarding BRC's Compliance Program, please contact info@brc.org