

FOOTHILLS GATEWAY, INC.

Corporate Compliance Policy Statement

POLICY:

It is the policy of Foothills Gateway, Inc. (FGI) to have a Corporate Compliance Program that is committed to preventing, detecting, and resolving inappropriate business practices, improper conduct, and/or violations of law, with a further goal to foster an ongoing effort to improve quality of operational performance.

Objectives of the Corporate Compliance Program

Foothills Gateway, Inc. is committed to the delivery of high quality services while conducting its business in full compliance with all statutes, regulations, and guidelines applicable to non-profit organizations, Colorado state laws, and Federal laws. FGI seeks to prevent and detect unlawful and/or improper conduct by its employees, contractors, business associates, board members and other stakeholders. FGI has implemented and will maintain an effective compliance program that will avoid improper conduct and/or inappropriate business practices.

Purposes of the Corporate Compliance Program

- Define the business and professional practice standards of conduct by which all FGI employees are expected to comply.
- Emphasize our commitment to compliance with all statutes, regulations, and guidelines applicable to non-profit organizations, Colorado state laws, and Federal laws.
- Establish an organizational structure and delineate responsibilities of the compliance efforts throughout FGI.
- Implement the Whistleblower and the Federal False Claims Act Prevention and Detection of Fraud and Abuse (DRA) policies and procedures that support confidential disclosure by which employees may ask questions and report concerns or compliance issues.
- Create a process for continuous auditing and monitoring of the operational activities and business practices.
- Ensure consistent enforcement of standards and procedures through prompt response and appropriate corrective action.
- Reinforce that all employees operate in an environment of honesty and integrity.

For further information about FGI's Corporate Compliance Program or to report a concern, contact the Chief Administrative Officer at 970-266-5312.

11/07... 5/16; 5/17; 2/18