

Lovelace

Title: Whistleblower and Anti-Retaliation Policy-CD-MKT	Policy Number: 90439.1
Approved by: LHS DCA Group, LHS Market Director, Compliance	Market Approval Date: Not Set Effective Date: 01/22/2026 Next Review Date: 01/22/2027
Attachments: None	Page 1 of 3

Applicability: This policy applies to the following Lovelace Health facilities: Lovelace Division, Lovelace Medical Center, Lovelace Medical Group, Lovelace Roswell Regional Hospital, Lovelace Roswell Specialty Clinic, Lovelace UNM Rehab Hospital, Lovelace Westside Hospital, Lovelace Women's Hospital

1. Purpose

Lovelace Health System and its subsidiaries (LHS) is committed to lawful, ethical behavior in all activities. LHS requires all Personnel to act in accordance with applicable laws, regulations, and policies, and to report any suspected misconduct to the legal or compliance departments.

This policy ensures:

- Employees and agents are encouraged to report in Good Faith any suspected Unlawful or Improper Acts that may violate the Health Care Consolidation Oversight Act; and,
- Whistleblowers are protected from Retaliation.

2. Scope

This policy applies to all Personnel of LHS or its subsidiaries

Protected Activity includes, in good faith:

:

- Reporting to or cooperating with the New Mexico Health Care Authority, the Attorney General, or other governmental entities;
- Participating in an investigation, inquiry, hearing, or proceeding relating to the New Mexico Health Care Authority; or
- Objecting to or refusing to participate in Unlawful or Improper Acts.

3. Definitions

Good Faith means that a reasonable basis exists as evidenced by the facts available. Personnel mean all employees, non-employed providers, contractors, officers or authorized agent of LHS.

Retaliatory Action means any discriminatory or adverse action taken by LHS against a whistleblower, including termination, discharge, demotion, suspension, harassment or limitation on access to health care services,

Unlawful or Improper Acts means a practice, procedure, action or failure to act on the part of LHS that violates the Health Care Consolidation Oversight Act or the applicable state agency's or attorney general's ability to exercise authority pursuant to the Act.

Reporting Procedures

Personnel are encouraged to report concerns through any of these channels:

Printed documents are considered uncontrolled.

Printed copies are for reference only. Please refer to the electronic copy for the latest version.

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- Immediate supervisor or department director
- Compliance Officer, Human Resources or to the legal department
- EthicsPoint Compliance Hotline: 800-633-2939 (anonymous option available)
- External reporting: Individuals may also confidentially contact the New Mexico Health Care Authority under the Health Care Oversight Act.

All reports must be made in good faith, based on a reasonable belief that a Unlawful or Improper Act occurred.

4. Non-Retaliation Commitment

LHS strictly prohibits any Retaliatory action against anyone who makes or participates in a good-faith report.

Any employee who believes they have experienced retaliation should immediately report it to Human Resources or Compliance.

5. Investigation and Confidentiality

All reports will be promptly reviewed by Compliance or HR. Investigations will be handled objectively and, whenever possible, confidentially.

Findings will be documented, and appropriate corrective or disciplinary action will follow when warranted.

6. Posting and Distribution

This policy will be:

- Posted conspicuously in workplace common areas;
- Published on LHS's public website
- Provided in written or electronic form to every officer, employee, contractor, volunteer, and any other agent of LHS at onboarding and whenever materially updated.

7. Record Retention

All whistleblower-related reports, investigations, and resolution records will be retained for at least seven (7) years from the date of final resolution, or longer if legally required.

New Mexico Statutes

Health Care Oversight Act NM Stat. Ann. §59A-63-1 *et seq.* Violations of this policy or the Health Care Oversight Act may result in administrative fines of up to \$10,000 per violation or up to \$100,000 for willful or repeated offenses.

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8. Annual Review

This policy will be reviewed at least annually by the Compliance Officer and Legal Counsel to ensure continued compliance with the Health Care Oversight Act.