

OCEANS HEALTHCARE	WHISTLEBLOWER PROTECTION
EFFECTIVE DATE: 08/01/2025	SECTION: HUMAN RESOURCES
REVISED DATE:	POLICY NUMBER: HR.05.19
APPROVED BY: GOVERNING BODY	PAGE 1 OF 2

#### SCOPE:

This policy applies to all Oceans Acquisition, Inc. subsidiary entities operating in the state of New Mexico (hereinafter referred to as “Oceans”).

Inpatient       IOP/IOP+       PHP       Support Center       Pharmacy

#### PURPOSE:

This policy is intended to provide information regarding the whistleblower protection requirements of the New Mexico Health Care Consolidation Oversight Act, N.M. Stat. Ann. § 24A-9-1 et seq. (the “Act”).

This policy applies to all Oceans employees, officers, contractors, subcontractors, authorized agents, and health care providers (“Covered Party” or “Covered Parties”).

#### POLICY:

Establishes protections for “whistleblowers,” meaning those Covered Parties who reveal information that they believe in good faith to be an “unlawful or improper act” by Oceans under the Act.

#### DEFINITIONS:

##### *Covered Parties*

All Oceans employees, officers, contractors, subcontractors, authorized agents, and health care providers

##### *Retaliatory Action*

Any discriminatory or adverse action taken against a Whistleblower, including termination, discharge, demotion, suspension, harassment or limitation on access to health care services

##### *Unlawful or Improper Act*

A practice, procedure, action or failure to act on the part of Oceans that violates the Act or the New Mexico Healthcare Authority’s (“HCA”) or the New Mexico Attorney General’s (“AG”) ability to exercise authority pursuant to the Act.

##### *Whistleblower*

A covered party who reports information they believe in good faith to be unlawful or improper under the Act

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**PROCEDURE:**

1. Oceans shall not take Retaliatory Action against a Whistleblower who:
  - Discloses to the HCA, the AG, or any other New Mexico governmental body information about an action or a failure to act by Oceans that they believe in good faith constitutes an Unlawful or Improper Act as defined by the Act;
  - Provides information to or testifies before a public body as part of an investigation, hearing, or inquiry into an alleged Unlawful or Improper Act; or
  - Objects to or refuses to participate in an activity, policy, or practice by Oceans that they believe in good faith constitutes an Unlawful or Improper Act.
2. Covered Parties who engage in activity protected under the Act and this Policy will not be subject to unlawful retaliation. Any Covered Party who believes that they have been subject to retaliation for making a report or participating in an investigation under the Act or this policy must promptly report such alleged retaliation to the human resources department or Oceans Compliance Department.
3. If Oceans determines any employee has engaged in conduct in violation of this policy, they will be subject to disciplinary action, up to and including termination.