

HERITAGE FARM POLICY AND PROCEDURES

Policy: Response to Governmental Investigations

Date: October 8, 2013

Rationale:

Law enforcement and regulatory agencies routinely conduct interviews to gather information during compliance audits, inquiries, and investigations. Heritage Farm shall respond to all official requests for information timely and accurately.

Policy:

- Heritage Farm is committed to appropriately responding and not interfering with any lawful audit, inquiry, or investigation.
- Employees will remain courteous and professional when dealing with investigators or agents.

Procedures:

- Announcement of an impending visit by any government investigator or auditor should be immediately reported to the Executive Director, who will notify the Compliance Officer (and legal counsel if appropriate).
- The handling of a search warrant or subpoena will be directed to outside legal counsel.

Visits to any of Heritage Farm's facilities:

- If an individual arrives at Heritage Farm and identifies himself or herself as a government auditor, investigator, or other representative, treats him or her with respect and courtesy. Notify the Compliance Officer and Executive Director.
 - Either the Compliance Officer or Executive Director will request identification (do not attempt to photocopy credentials, as this is a violation of Federal law) and the reason for the visit.
- Ask the individual to wait in an unused office or a location where business is not conducted.
- Notify all appropriate persons or entities upon learning the type and scope of the investigation.
- Do not enter into any investigation without being advised previously to the investigation.