PROCEDURE # 9.1D		EFFECTIVE DATE	REVISED DATE
TITLE:	COMPLIANCE OVERSIGHT COMMITTEE	7/22/2022	9/11/2025
ATTACHMENT TO		REVIEW DATES	
POLICY #:	9.1	7/21/23, 9/11/25, 7/14/26	
POLICY TITLE:	CORPORATE COMPLIANCE		
CHAPTER:	COMPLIANCE		

I. PURPOSE

The Lakeshore Regional Entity (LRE) shall maintain a Compliance Oversight Committee (COC) that will advise the Corporate Compliance Officer (CCO), Chief Executive Officer (CEO), and the LRE Board in overseeing the implementation and operation of the LRE Compliance Program. The COC will review reports and recommendations made by the LRE CCO regarding compliance activities. This includes data regarding compliance information and activities generated through audits, monitoring, and individual reporting.

The COC serves as an informational and advisory resource for the CCO and establishes a communication link between the employees and the compliance function.

The COC's purpose is accomplished through the fulfillment of duties and responsibilities of each member at the operational level, and by reviewing reports and recommendations made by the LRE CCO regarding compliance activities, which are an integral part of the LRE's commitment to compliance

II. PROCEDURES

A. Organizational Structure

The Compliance Oversight Committee is chaired by the CCO. The COC will be comprised, per LRE policy, by individuals with the requisite seniority and comprehensive experience within their respective functional areas to implement any necessary changes in LRE's policies and procedures.

1. The membership will consist of the following individuals:
    - Chief Executive Officer (CEO)
    - Chief Operating Officer (COO)
    - Chief Financial Officer (CFO)
    - Chief Information Officer (CIO)
    - Representative of the Board of Directors
    - Compliance Officer (CCO)
    - Legal Counsel (as needed)

2. Additional individuals with varying responsibilities within the organization may be requested to attend meetings based on subject expertise.
3. Compliance Oversight Committee members should demonstrate high integrity, good judgment, assertiveness, and an approachable demeanor, while eliciting the respect and trust of the employees of the organization.

B. Duties and responsibilities of the Oversight Committee shall include the following:
   1. Assisting in the development and review of the Compliance Plan and related policies to ensure they adequately promote compliance and address legal requirements and identified risk areas;
   2. Analyzing the regulatory environment in which LRE operates, the legal requirements with which it must comply and specific risk areas;
   3. Analyzing the effectiveness of the compliance program and making recommendations for improvement;
   4. Assisting the Compliance Officer in identifying potential risk areas and violations;
   5. Advising and assisting the Compliance Officer with compliance initiatives;
   6. Working with appropriate departments to develop standards of conduct that promote allegiance to the compliance program;
   7. Recommending and monitoring, in conjunction with the relevant functional area leaders, the development of internal systems and controls to carry out LRE standards, policies and procedures as part of its daily operations;
   8. Determining the appropriate strategy/approach to promote compliance with the LRE compliance program and detection of any potential violations, such as through hotlines and other fraud reporting mechanisms;
   9. Monitoring internal and external audits and investigations for the purpose of identifying troublesome issues and deficient areas experienced by LRE and implementing corrective and preventive action;
   10. Receiving, interpreting, and acting upon reports and recommendations from the CCO;
   11. Providing a forum for the discussions of compliance related issues.

C. Meeting Schedule
   The Compliance Oversight Committee will meet at minimum quarterly and whenever unique situations arise which require such a meeting.

III. CHANGE LOG

Date of Change	Description of Change	Responsible Party
06/26/2014	New Policy	Chief Compliance Officer
7/22/2022	Annual Review- Rescinded Policy and Adapted as Procedure	Chief Compliance Officer
9/11/2025	Annual Review; changes to COC membership	CEO/Designee
7/14/2026	Annual Review – minor grammatical changes	CEO/Designee