



CHHS Compliance Helpline Questions and Answers for CHHS Employees

Q. How will the CHHS Helpline work?

CHHS has contracted with EthicsPoint®, an independent professional service, to provide the intake system for our CHHS Helpline. EthicsPoint offers a comprehensive and confidential Internet- and telephone-based reporting tool that assists CHHS and our employees in working together to address fraud, abuse, misconduct, and other violations in the workplace, while helping to cultivate a positive work environment.

Q. Why do we need a system like EthicsPoint?

The reasons why we need a reporting tool:

1. Employees are a company's most important asset. Through open channels of communication, you can participate in improving the company and helping to create a safe and ethical environment.
2. The Office of the Inspector General has stated the existence of a method to report alleged violations of laws and regulations confidentially is an element of an effective compliance program.

Q. How do I report something?

EthicsPoint helps ensure all CHHS employees can file a report anonymously and in the manner most comfortable or convenient for you. You can make a Helpline report at work, home or any other location – via a toll-free phone number or the Internet. Here's how:

- By calling EthicsPoint's toll-free phone number: 1-877-659-5200
- By accessing the EthicsPoint Internet site: www.ethicspoint.com
- By clicking on the EthicsPoint link on the CHHS intranet

Access to EthicsPoint is available 24 hours a day, seven days a week.

Q. Does senior management really want me to report?

Yes, senior management certainly does. You may have initial knowledge of a non-compliant activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our business partners.

Q. Why should I report what I know?

We all have the right to work in a positive environment. But with that right comes the responsibility of acting in an ethical manner and letting appropriate people know if someone is not acting in a compliant manner. By working together, we maintain a healthy and productive environment.

Q. What types of situations should I report?

The CHHS Helpline's purpose is to enable anonymous and confidential communication from employees about things such as accounting or financial malfeasance, charging, billing and coding errors, inappropriate employment practices and actions, misconduct, sexual harassment, workplace violence, unsafe work conditions, privacy issues, fraud and theft.

Q. If I see a violation, shouldn't I just report it to my manager and let my manager deal with it?

You certainly can, but there are good reasons why you could use EthicsPoint as well. First, EthicsPoint ensures that your report gets to the appropriate people. More importantly, reports can be filed anonymously and all report information is secure and held in the strictest confidence.

Q. It is my understanding any time I connect to the Internet at work, someone sees what website I've visited and for how long. Won't this identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

Q. Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, the library or any Internet portal will remain secure and anonymous, if you wish. An Internet portal never identifies a visitor by screen name, and the EthicsPoint system strips away Internet addresses so anonymity is maintained. Plus, CHHS will not to seek a reporter's identity.

Q. I am concerned the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me this will not happen?

We always encourage you to identify yourself, however, the EthicsPoint system is designed to protect your anonymity. As a reporting party, you need to ensure the body of the report does not reveal your identity by accident, for example, "From my cube next to Jan Smith..." or "In my 23 years..." When you place a call, the representative will also help ensure you do not accidentally provide identifiable information.

Q. What if I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Our company chooses to promote ethical behavior. Unethical conduct, at any level, ultimately hurts the company and all employees, including you. A seemingly harmless lapse in ethics could potentially have a harmful effect on an otherwise healthy organization. So if you know of incidents of misconduct or ethical violations, we hope you will be motivated to report it.

Q. I am not sure that what I have seen or heard is a violation of company policy, or involves unethical or illegal conduct, but it just does not look right to me. What should I do?

You should talk to your manager or another person in management. If you are uncomfortable doing so, you should file a report with the CHHS Helpline. EthicsPoint will help you prepare and file your report so that it can be properly understood. We'd rather have you report a situation that turned out to be harmless than let possibly unethical or illegal behavior go unchecked because you weren't sure.

Q. Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent possible breaches in security. EthicsPoint makes an anonymous and confidential report available only to designated officials, including the Director of Corporate Compliance who is charged with evaluating these types of reports. These officials have had training in treating reports confidentially. EthicsPoint and CHHS work together to ensure no initial report is shared with implicated parties, their peers, or subordinates. Investigations are tracked by the CHHS Director of Corporate Compliance.

Q. What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

CHHS's Helpline and report distribution are designed so no initial report is shared with implicated parties, their peers or their subordinates. There are protocols for appropriately handling all reports, even those implicating high-level employees.

Q. What if I remember something important about the incident after I filed the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint website or via the toll-free number, you receive a unique Report Key and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add further information or answer questions. We strongly suggest you return to the site in six days of your original report filing to see if there are questions or open issues. You and the company now have entered into an "anonymous dialogue" which can help clarify and resolve a situation, no matter how complex. Be sure to remember the password you select as you file your report. This is your confidential way to view updates and add additional information regarding your report. To maintain

confidentiality, EthicsPoint does not keep a list of these passwords. If it is lost, you will not be able to return to your report. Instead, you will have to create a new report using the original information, and create a new password.

Q. Are follow-up reports as secure as the first one?

All EthicsPoint correspondence is handled in the same confidential and anonymous manner.

Q. What if I want to be identified with my report?

We always encourage you to identify yourself by talking to your manager or another person in management. However, there is a section in the Helpline report for identifying yourself, if you wish. The CHHS report distribution process ensures confidentiality and anonymity within the organization.

Q. How do I follow up on a report I've submitted?

In six business days of submitting your report, you may access the EthicsPoint website or you may call the EthicsPoint toll-free number, 1-877-659-5200, and use your unique Report Key and password to obtain an update on the progress of your report.