



Frequently Asked Questions

Shriners Hospital for Children® (“SHC”) created the Corporate Compliance Department to help ensure that our organization operates according to high ethical standards and in compliance with both our legal obligations and established internal procedures. We developed these answers to respond to frequently asked questions you may have about the Compliance Hotline and the Corporate Compliance Department.

Q: Where do SHC’s compliance policies and regulations apply?

A: The policies and regulations apply to SHC headquarters, its hospitals, and any other SHC facility.

Q: Does SHC really want me to report?

A: We certainly do. In fact, we need you to report. You know what is going on in our organization - both good and bad. You may have knowledge of an activity that may be cause for concern. Your reporting may minimize the potential negative impact on SHC and its people. Also, offering positive input may help identify issues that need correcting to improve our culture and performance.

Q: What may I or should I report to the Hotline?

A: You may report any actual or suspected violation of the law, policies, procedures or any ethical concerns you may have. If you are an employee, however, we suggest that you first consult with your manager. Contact your Human Resources representative for help with issues relating to working conditions. Contact the Legal Department if you believe the matter involves compliance with any legal, regulatory or government requirements.

If these steps did not resolve the issue, or if you are reluctant to use these channels, please contact the Corporate Compliance Department. The Corporate Compliance Department seeks to prevent unlawful or unethical conduct and to detect it if it occurs. The Corporate Compliance Department can also answer questions and respond to concerns you may have about compliance, ethics and the requirements specified in SHC policies.

Please feel free to contact the Corporate Compliance Department even if you unsure whether a matter should be reported.



Q: If I see a violation, shouldn't I just report it to my manager or Human Resources and let them deal with it?

A: You certainly can, but there are several reasons why you may want to use the Hotline as well. The Hotline 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 confidence.

Q: What is a "whistleblower?"

A: A whistleblower is someone who provides information or raises a concern in good faith regarding suspected misconduct, mismanagement, waste of resources and/or abuse of authority within the organization.

Q: How does SHC protect a whistleblower?

A: SHC recognizes its obligation to protect whistleblowers from being subjected to possible retaliation, or the fear of such consequences, as a result of raising concerns in good faith. There are three ways in which the organization affords protection: (1) you may choose to remain anonymous when reporting suspected misconduct or raising concerns; (2) you may request to have your identity kept confidential during the investigative process; and (3) as a deterrent, the organization expressly prohibits retaliation against anyone who makes such a report in good faith.

Q: How does the Hotline work?

A: If you make a report online, the webpage prompts you to provide the necessary information to evaluate your concern. You will be given the option to remain anonymous or to provide your name and contact details. Once you have completed your report, you will be provided with a Report Key, and you will be asked to create a password. You should return to the website later on for an update because we may need to ask you questions in order to look into the report further. You will need to enter both your Report Key and your password.

If you make a report by telephone, your call will be answered by a qualified call center specialist. This person works for a third-party vendor and has no connection to SHC. Depending on the language in which you wish to conduct the conversation, the call center



specialist will either continue with the call, transfer it to a colleague who is able to speak your language, or ask an interpreter to join the conversation.

Once a report is made to the Hotline, details of the report are sent to the Corporate Compliance Department for follow up.

Q: Can I still file a report if I don't have access to the Internet?

A: You can file a report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have computers with Internet access. If you don't have access or are uncomfortable using a computer, you can call the Hotline at (866) 290-7637 within the United States, Mexico and Canada.

Q: Do I need to identify myself?

A: No, only if you wish. When you call the Hotline, you may remain anonymous. The call will not be recorded, and no attempt is made to determine the number from which you are calling. We understand the value of reports provided by individuals who wish to remain anonymous. We also understand the value of being able to contact those who make reports to ask for additional information or clarification of the issues. Often, additional information is necessary for a successful conclusion of an investigation. We encourage you to identify yourself; however, it is not required.

Q: Is the telephone toll-free Hotline confidential and anonymous too?

A: Yes. You will be asked to provide the same information that you would provide in an online report, and an interviewer will type your responses into the Hotline website. These reports have the same security and confidentiality measures applied to them during delivery.

Q: When can I submit a report?

A: You can submit a report anytime, anywhere. The Hotline is available 24 hours a day, seven days a week, for both online and telephone reporting.



Q: What information should I be prepared to give?

A: Your report should tell us (1) what happened, (2) when it happened, (3) where it happened, (4) who was involved, (5) what was done and/or said, (6) whether there were any witnesses other than you, (7) where these other parties can be contacted, (8) whether you have already discussed this with another internal department or manager, and (9) what documents may support your report. In order to protect the reputations and privacy rights of all parties, and to promote the fairness of the investigation process, it is important that the information you provide be accurate and given in good faith.

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

A: A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the Hotline system strips away Internet addresses so that anonymity is maintained. Plus, the vendor that operates the Hotline for SHC is obligated not to pursue a reporter's identity.

Q: Is it possible that my Hotline call can be traced back to me by using "Caller ID?"

A: No. Caller ID is disabled for all incoming calls.

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

A: There is a section in the report for identifying yourself, if you wish.

Q: Will I get into trouble if I report an ethical concern, or if I suspect someone of violating a SHC policy or regulation?

A: No. SHC strictly prohibits retaliation, in any form, against anyone who makes a report in good faith, even if the concern is later determined to be unfounded. Any suspected retaliation should be reported to the Hotline. However, anyone who knowingly makes a false report might be subject to disciplinary action.



Q: Do I have to participate in any investigation?

A: Yes. Unless an applicable law or policy provides otherwise, each SHC workforce member is required to cooperate in an investigation.

Q: What are the consequences for violating policies and regulations?

A: People who violate applicable policies and regulations may be subject to disciplinary action. Those who violate these obligations may simultaneously violate applicable law. This may subject them to prosecution, imprisonment and fines, and they may be required to reimburse SHC and others for losses.

Q: Does an investigation ever lead to the prosecution of someone?

A: If necessary, we will contact law enforcement authorities. SHC supports, as a matter of principle, the criminal prosecution of those involved in criminal conduct, regardless of whether any restitution is paid to SHC.

Q: How will I know a violation has been corrected?

A: All reports are reviewed thoroughly and confidentially to determine the best resolution strategy. Depending on the complexity of the matter, it may take time to investigate. For confidentiality reasons, you may not be told the specifics of how a particular matter is being / has been resolved. However, if you are an employee and the problem was in your immediate work area, you may see a change in procedures or possibly a change in personnel.