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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool to assist management and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- We encourage an open and transparent dialogue with our employees, vendors and other members of the SVHC community. A system like EthicsPoint allows for true confidentiality and 24-hour access in making a report.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.



Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our Code of Ethical Conduct or other concern you may have.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates our Code of Ethical Conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. We think you are the expert in your area--you know what is going on in our company, both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.



Isn't this system just an example of someone watching over me?

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.



Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log 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. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports generated during business hours.

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

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 EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

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

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

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



Tips & Best Practices

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. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

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

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

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

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

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

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique user name 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 more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue" where situations are not only identified but can be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.



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

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline 855-262-1442 which is available 24 hours a day, 365 days a year.



Gifts and Gratuities

SVHC Gifts, Gratuities, Prizes & Honoraria Frequently Asked Questions (FAQs):

Question #1: At a conference, a sponsoring company provides each attendee with a tote bag in which to carry conference materials. Can these bags be accepted?

Answer: Yes, so long as the value of the bag is less than \$15. Under the Gifts, Gratuities, Prizes and Honoraria policy *nominal or token gifts from vendors with the vendors' name valued at up to \$15 may be accepted.*

Question #2: At the same conference, there is a vendor hall.

- At the vendor table, they are giving water bottles with the vendor's emblem. Can you accept the water bottle?

Answer: Yes, if the value is less than \$15.

- One of the vendors is doing a raffle for a **Kindle Fire**. Can you participate in the raffle? If you win, can you keep the prize?

Answer: Yes and yes, if the raffle is truly random and has no connection with current or future business decisions. Whenever possible, employees are encouraged to share all raffle prizes. Under the Gifts, Gratuities policy, *random raffle prizes may be accepted if there is no potential to influence any business judgment or decision.*

Question #3: A vendor is asked to supply a birthday cake for a member of a department the vendor regularly does business with. Is this acceptable?

Answer: No. It is not acceptable to solicit food from vendors. The receipt of food from vendors is acceptable only in limited circumstances as stated in the Gift, Gratuities policy and generally, approval from the Compliance Department should be obtained before accepting food from vendors.

Question #4: What if the vendor in question 3 brings the cake on their own?

Answer: It will depend on whether the vendor is an **existing** business relation or a potential **business** relation. If the vendor already has a contract with us and is not seeking any new or expanded business, you can accept the cake if it is less than under \$100 and it was not solicited. If this vendor is proposing any new relationship with us or is seeking additional business, the cake must be declined.

Question #5: A pharmaceutical company provides logo embellished pens, sticky note pads and coffee mugs to a department. Is that acceptable?



Answer: No. Gifts from pharmaceutical companies, even of very low value, are prohibited. Vermont law limits the gifts from pharmaceutical companies and they should always be declined.

Question #6: A company is bidding to provide services to the SVMC. Members of the company come here to speak to members of executive management and other leaders. SVMC provides lunch for the presentation. Is this acceptable?

Answer: Yes, but only because SVMC is supplying the lunch. The company is a potential business relation and we do not accept any gifts, including food, from potential business relations.

Question #7: Staff attending a professional meeting may be invited out for dinner by a vendor representative. Is that acceptable?

Answer: The goal is to “avoid even the appearance of improper influence” on business decisions. As a result, a meal provided by any vendor who has an **established** business relationship with SVMC can be accepted under the terms of the Gifts, Gratuities policy up to a value of \$100 per event and no more than once per quarter. If the vendor does not have an existing business relationship with SVMC, or is soliciting new business, the meal cannot be accepted and the staff member attending should pay for their own meal.

Question #8: Materials Management orders bulk supplies as needed. In many cases the vendor will include free gifts, e.g. CD players or toys as promotional items. What should be done with these items?

Answer: The promotional materials, if less than \$100 in total, may be shared with employees. If the total value exceeds \$100, they should be returned to the supplier; if that is not possible, they can be donated to an approved charity or destroyed.

Question #9: You are invited by the company who supplies patient equipment to SVMC to attend the SVHC Foundation golf tournament; are you able to attend? The equipment company has an existing contract with SVMC.

Answer: You can attend and you may play in the business relations' foursome, but you must pay your own green fees if the fee is greater than \$100. Under the policy, you can accept existing business-relation paid entertainment only up to \$100 per event and one event per quarter.

Question #10: The same equipment company purchases a table at the SVHC Harvest Ball. Some SVHC employees are invited to attend. Can SVHC employees accept the ticket?

Answer: No, SVHC employees can attend and may sit at the table with business relations, but since the cost is greater than \$100, the employees must purchase their own ticket.



An exception to both these answers relates to gifts from the physician groups who work at SVMC under a professional services agreement and their individual members. Currently these are Anesthesia Associates of Bennington, Dartmouth-Hitchcock, Radiology Associates of Bennington and Taconic Orthopedics. If one of the physicians in these groups invites you to attend the golf tournament or the Harvest Ball with them, and you are an SVMC employee who is **not** a member of senior management, you may accept. Remember, you want to avoid *any appearance of impropriety or influence*. You should always review these gifts with your manager before accepting.

Question #11: What if the business purchasing the table in question 10 is **not** a business relation of SVHC, meaning that they do not have a contract with SVHC or any related entity; can SVHC employees, volunteers or Board members accept the ticket?

Answer: SVHC community members (defined in the Gifts, Gratuities policy to include *Board members, EMT, credentialed medical providers, employees and volunteers*) **should exercise great caution** in this area. The Gifts, Gratuities policy does not prohibit accepting a gift from anyone or anything which does not have a business relationship with SVHC. However, remember that the Code of Ethical Conduct encourages us to *act according to the highest ethical and professional standards of conduct* and to *avoid actual or perceived conflicts of interest*. The Conflict of Interest policy directs us to avoid any *undue influence or appearance of competing interests*. The Gifts, Gratuities policy directs us to *avoid even the appearance of impropriety* and to *avoid any activities which have the potential to influence any business judgment or decisions*.

As a result, community members should ask themselves whether there is any potential to influence decisions, and whether there is any appearance of impropriety, and avoid accepting any such gift which may present even a perceived conflict of interest.

Question #12: Can the Foundation solicit business relations for purposes of fundraising?

Answer: Solicitation may be initiated by the Foundation as long as (1) the solicitation is for a bona fide charitable event hosted by SVHC; (2) it is a broad community solicitation; and (3) the participation by a vendor or a potential vendor in a fundraising activity is **not** taken into account when making any business decisions. Questions about “fundraising” activities should be directed to the Foundation Office.

Question #13: Can Foundation staff accept a meal from someone who is being solicited as a donor to the Foundation?

Answer: Generally yes, so long as the potential donor is **not** a business relation of SVHC. Sharing meals at the expense of either SVHC or the potential donor is excluded for the Gifts, Gratuities polis **so long as** the potential donor is not also engaged in a contract with SVHC for the provision of goods or services to SVHC. If there is a potential business relationship between the donor and SVHC, there can be no payment for meals by the donor.



Question #14: A patient has offered a financial gift to the staff as the result of some very successful treatments at the hospital; can I accept?

Answer: Gifts of money and donations offered by a patient or a patient's family can never be accepted by a staff member. The patient or family member may be redirected to the Foundation staff if they wish to make a gift to the organization. If the patient leaves the gift and if it cannot be returned, contact the Compliance Department for resolution.

Question #15: What about brownies or other baked goods given by a grateful patient; can I accept those?

Answer: Yes, as these are a modest "thank you" gift and it would be hurtful to decline. Share them with co-workers. The Gifts, Gratuities policy specifically allows the receipt of such nominal or token gifts of appreciation.

Question #16: A vendor sends our department a gift basket full of food for the holiday. Can we accept the basket?

Answer: Yes, if it is an existing business relation, if the value of the gift is less than \$100, and if it is unsolicited. If it is from a vendor who is seeking a contract, it must be declined or returned. Share the gift with co-workers.

Question #17: I've been asked to speak at an industry conference; can I attend? If so, how do I get compensated for my time?

Answer: First, you must obtain the approval of your supervisor. If approved, you must decide whether you are attending for SVHC or not. If it is on behalf of SHVC, you do not have to use vacation days, but you must give your honoraria to SVHC. Alternatively, if you use ET or PTO for the days away, you may keep any compensation. Always start by speaking with your supervisor. The Gifts, Gratuities policy provides specific direction for workshops and honoraria.