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About EthicsPoint

What is EthicsPoint?

Wayne Health has selected EthicsPoint, a third party, secure tool, for the reporting of compliments, complaints, and compliance/<u>Code of Business Conduct and Ethics</u> issues by employees and patients. EthicsPoint, created by NAVEX Global, is a comprehensive and confidential reporting tool. EthicsPoint enables management, employees, and patients to work together to address fraud, abuse, and other misconduct while cultivating a positive healthcare environment.

Why do we need a system like EthicsPoint?

- By creating open channels of communication for the confidential reporting of compliments, complaints, compliance issues, and other concerns, we promote a positive environment for patients and employees alike.
- An effective reporting system supports our other efforts to foster a culture of safety, integrity, and ethical decision-making.
- Tracking and trending of issues and concerns allows for system improvements to be put into place to prevent future occurrences.

Reporting – General

May I report using either the Internet or the telephone?

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

To file using the Internet, go to the **EthicsPoint reporting page**. You can file from home. Many public locations, including the public library, have Internet computers.

To file by phone, call the Compliance hotline toll-free at 866-270-1965, which is available 24 hours a day, 365 days a year.

What types of situations should I report?

The EthicsPoint system allows patients and employees to report any violation of our stated <u>Code</u> of Business Conduct and Ethics, 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 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 NAVEX Global. 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 a safe and 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 or safely. By working together, we can maintain a safe, healthy, and productive environment.

Does Wayne Health really want me to report?

We certainly do. In fact, we *need* you to report. You may have initial knowledge of an activity that may be cause for concern. Your reporting can <u>minimize</u> the potential negative impact on our patients and employees. 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, accessible by the Risk Management department at Wayne Health. Each report recipient has had training in keeping these reports in the utmost confidence.

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

No. EthicsPoint is a positive aspect of Wayne Health's overall philosophy that allows us to ensure a safe, secure, and ethical environment. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in healthcare, 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 website that my PC connects with. Won't this log identify me as the report originator?

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

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 or at a friend's house) through the EthicsPoint secure website. Many people choose this option, as NAVEX Global's data shows that fewer than 12% of reports are 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.

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 protects 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 to identify yourself, if you wish.

Tips & Best Practices

I am aware of some individuals acting unethically or unsafely, but it doesn't affect me. Why should I bother reporting it?

Wayne Health promotes ethical and safe behavior. All unethical or unsafe conduct, at any level, ultimately hurts the patients and employees, including you. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and other patients/employees 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. NAVEX Global 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.

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 ensure 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, randomized number called a "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 more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer questions from Wayne Health. You and Wayne Health have now entered into an "anonymous dialogue," where situations are not only identified, but can also 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.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

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, at https://secure.ethicspoint.com/domain/media/en/gui/35818/index.html. You can file from home. Many public locations, including the public library, have Internet computers.

If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free Compliance hotline at 866-270-1965, which is available 24 hours a day, 365 days a year.