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## About NAVEX

### What is NAVEX?

NAVEX 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 NAVEX?

- 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 are required by law to have an anonymous reporting mechanism so that staff, contractors, patients, visitors, and medical and clinical staff members can report concerns or potential violations.
- 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 NAVEX, you have the ability to file a confidential, anonymous report via either the telephone (1-800-555-8497) or the Internet.

### What type of situations should I report?

The NAVEX system is designed for an individual to report any violation of our stated Code of Business Conduct (“Code”), or other concern you may have.

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

When you observe some behavior that you believe violates our Code, we would like for you to report it. Ideally, any concerns should be addressed to the direct manager, or other member of the 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. 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?**

Memorial fosters a positive environment and this reporting mechanism encourages the responsibility of acting in an ethical manner by letting us know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment.

### **Does management really want me to report?**

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 initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the organization and our patients. Also, offering positive input may help identify issues that can improve our culture and performance.

### **Where do these reports go? Who can access them?**

Reports are entered directly on the NAVEX secure server to prevent any possible breach in security. NAVEX makes these reports available only to specific individuals within Memorial 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 NAVEX 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**

**As a team member, 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?**

While Memorial does maintain a network traffic log, this log is used to combat potential information security violations and will never be used to identify individuals who submit an anonymous report. Memorial is committed to maintaining your privacy.

NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to NAVEX is available. In fact, NAVEX 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 through the NAVEX secure website. .

### **Can I file a report from home and still remain anonymous**

A report from home will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the NAVEX system strips away Internet addresses so that anonymity is maintained. Plus, NAVEX is contractually committed not to pursue a reporter's identity.

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

The NAVEX 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 NAVEX 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 organization chooses to promote ethical behavior. All unethical conduct, at any level, may ultimately hurt patients, team members and the organization. If you know of any incidents of misconduct or ethical violations, we encourage you 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 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 misconduct or unethical behavior go unchecked because you weren't sure.

**As a team member, what if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up or retaliate against me for bringing attention to the matter?**

The NAVEX system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named. NAVEX makes these reports available only to specific individuals within Memorial who are charged with evaluating the report, based on the type of violation and location of the incident.

Memorial has a non-retaliation culture that protects individuals from retaliation.

**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 NAVEX website or through the NAVEX Call Center, you receive a unique user name and are asked to choose a password. You can return to the NAVEX system again either by Internet or telephone and access the original report by providing your user name and password 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 NAVEX 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?**

If you don't have access or are uncomfortable using a computer, you can call the NAVEX toll-free hotline 800-555-8497 which is available 24 hours a day, 365 days a year.