

CleanSlate – EthicsPoint ReportLine Frequently Asked Questions (FAQs)

What is EthicsPoint?

EthicsPoint is a comprehensive & confidential reporting tool to assist CleanSlate & its employees with reporting suspected violations of law or CleanSlate policy.

Why does CleanSlate 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 & maximize productivity. An effective reporting system will augment our efforts to foster a culture of integrity & ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With CleanSlate's ReportLine & EthicsPoint system, you can anonymously file a report by way of the Internet or telephone.

What type of situations should I report?

The CleanSlate's ReportLine & EthicsPoint system is designed to report behaviors that conflict with CleanSlate standards & may violate a law or regulation. Complaints that are violations of law or regulation are typically reported via CleanSlate's Patient Support Services at 413-341-1780.

If I see a violation, shouldn't I just report it to my manager, security or People Services & let them deal with it?

When an employee of CleanSlate observes behavior that they believe is in violation of CleanSlate's policy or the law, the employee has a duty to report it. Ideally, employees should bring concerns to their direct supervisor or manager, or someone within management. We recognize, however, that there may be circumstances when employees are not comfortable reporting the issue directly to their supervisor or management. That is why CleanSlate partnered with EthicsPoint to establish its ReportLine.

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

Misconduct in companies is a threat to public policy & weakens the morale & culture of ethics & integrity at CleanSlate. Employees & agents (e.g., contractors) have a duty to act in an ethical manner & let the management at CleanSlate know if someone from CleanSlate (employee or agent) is not acting appropriately. Everyone else should do it because it's simply the right thing to do. By working together to address ethical violations we can maintain a healthy, productive, & ethical environment at CleanSlate.

Does management really want me to report?

<u>Yes.</u> Employees have a unique knowledge of the organization, including activities that may be cause for concern, this is why management strongly encourages employees to report any behavior that they believe is in violation of CleanSlate policy or the law. Reporting can minimize the potential for the negative impact any misconduct could have. Additionally, reporting often identifies important system issues & offers insight into the potential risks that the organization may not be aware of which may lead to the implementation of important improvements within CleanSlate.

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 delivers the reports to a specific senior-level individual within CleanSlate who is charged with evaluating the report. Each of these report recipients has had training in keeping these reports in the utmost confidence.

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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 a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your personal computer to EthicsPoint is available. EthicsPoint is contractually committed not to pursue a reporter's identity. If you feel uncomfortable making a report on your work computer, you have the option of using a computer outside of work (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Or, you always have the option of using the telephone to call in your concerns to CleanSlate using its ReportLine at 844-338-7287.

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

<u>Yes.</u> An Internet portal never identifies a visitor by screen name & the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Again, EthicsPoint is contractually committed not to pursue a reporter's identity.

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

<u>Yes.</u> You will be asked to provide the same information that you would provide in an Internet-based report & an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security & confidentiality measures applied to them during delivery. Keep in mind that the more information you provide, the better able CleanSlate will be able to investigate.

What if I want to be identified with my report?

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

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

Unethical conduct, at any level, ultimately hurts you as a CleanSlate employee. Remember, CleanSlate employees, including you, have a duty to report misconduct, whether you provide your name or report anonymously.

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 with CleanSlate's ReportLine. They will help you prepare & file your report so it can be properly understood. The preference is that a report is filed in a situation that turns out to be harmless rather than possible unethical behavior goes unchecked.

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

CleanSlate's ReportLine & the EthicsPoint system are designed so that implicated parties are not notified or granted access to reports where 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 CleanSlate's ReportLine through the EthicsPoint website or through the EthicsPoint Call Center, you receive a unique username & are asked to choose a password. You can return by Internet or telephone & access the original report to answer questions posed by a CleanSlate investigator or add more detail that will help resolve open issues. It is strongly suggested that anyone who has filed a report return to the site in the time specified to answer questions from investigators with CleanSlate.

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

Yes. All correspondences are held in the same strict confidence as the initial report.

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

Yes. You can call CleanSlate's ReportLine at 844-338-7287 - it is toll-free & available 24 hours a day, 365 days a year.