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About We Care

Why do we need a program like We Care?

- We value our relationship with every resident, family member and loved one and maintaining open communication is a key to customer service and resident quality of care and quality of life.
- We believe that our employees are our most important asset. By creating open avenues of communication, we can promote a positive work environment and maximize productivity.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

Who is EthicsPoint?

EthicsPoint is a third party company that provides a comprehensive and confidential reporting system for our We Care program, which assists residents, family members, friends, management and employees to address issues of concern.

Reporting – General

May I report using either the Internet or the telephone?

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

What type of situations should I report?

We welcome you to provide feedback or communicate unresolved concerns relating to any matter, such as customer service, employee relations, billing matters, and resident rights.

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

Ideally, residents, family members, friends and employees should bring any concerns forward to a member of our management team or to their direct supervisor. If an employee observes behavior that they believe violates our Code of Conduct, our expectation is for that employee to report it. 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 live and 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.

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 centers - 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 center and our people. Also, offering positive input may help identify issues that can improve 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 our organization who are charged with evaluating the report, based on the type of matter reported. Each of these report recipients has had training in keeping these reports in the utmost confidence.

As an employee, isn't this system just an example of someone watching over me?

The We Care program 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.

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

When you file a report at the We Care Web site or through the We Care Call Center, you receive a unique user name and are asked to choose a password. You can return to the We Care 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 also be resolved, no matter how complex.

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 a center's PC, you have the option of using a PC outside our center (such as one located at an Internet café, at a friend's house, etc.) through the We Care secure website. Also, you always have the option of sharing your feedback or concern by calling 1-855-260-2615.

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 We Care 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 We Care will ultimately reveal my identity. How can you assure me that will not happen?

The We Care 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 We Care 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 for Employees

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 organization and all employees, including you. . 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 We Care system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

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

All We Care 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 a We Care 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 to or are uncomfortable using a computer, you can call the We Care toll-free hotline, which is available 24 hours a day, 365 days a year.