

## **Online Reporting**

### **Frequently Asked Questions**

**Q: If I make a report to the Compliance Hotline, will I have to speak to someone at ARA?**

A: No. The Compliance Hotline is staffed by a separate company, EthicsPoint, that specializes in receiving compliance reports. You may leave your name, or give an anonymous report.

**Q: What issues should I report to the Compliance Hotline?**

A: Suspected or actual violations of ARA's Compliance Program, Code of Ethics and Conduct, or of applicable laws and regulations. Examples of the kinds of issues staff are required to report, if they have knowledge, include known or suspected kickbacks or bribes, falsification of documentation (financial, medical or other), destruction of records required to be retained under our Document Destruction policy, billing irregularities, conflicts of interest, and waste or misuse of ARA property or funds.

**Q: How will I know if anyone followed up on my Hotline report?**

A: All Compliance Hotline reports are reviewed promptly and investigated within an appropriate time, depending upon the circumstances. If you report anonymously, you will create a password of your choosing and the Hotline staff will give you a report key to check on the status of your report. We won't provide detailed information about findings but will let you know if an investigation is underway or completed.

**Q: If I make an anonymous report, can you guarantee no one will ever know it was me?**

A: If you report anonymously, we will not try to find out who you are. Unless necessary to conduct an adequate investigation or compelled by judicial or other legal process, we will keep your identity confidential if you request that we do so. And remember, we don't allow retaliation against anyone who files a good faith report.

**Q: What do you mean by reporting in "good faith"?**

A: A good faith report is when you believe or suspect there was a violation that should be reported, and you make a truthful report. A report is not made in good faith if you know it's false and are trying to cause trouble for someone by making unfounded accusations.

**Q. What are my options for reporting a concern?**

If you believe that actions have taken place, may be taking place or may be about to take place that violate or would violate ARA's Code of Ethics and Conduct, ARA policy or any legal or regulatory requirements, you must report the matter in one of the ways described below.

- to ARA Compliance Hotline, 1-800-423-0250

- by completing a form on ARA's compliance reporting website at [www.americanrenal.ethicspoint.com](http://www.americanrenal.ethicspoint.com)
- by calling Compliance at 978-922-3080 x 252
- by mail addressed to Chief Compliance Officer, 500 Cummings Center, Beverly MA 01915
- via secure e mail to [compliance@americanrenal.com](mailto:compliance@americanrenal.com)

## 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 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.

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