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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist Children's Colorado team members as they work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive and ethical work environment.

### Why does Children's Colorado need a system like EthicsPoint?

- At Children's Colorado we believe that our team members play an integral role in achieving our mission and vision. By creating open channels of communication, we promote a positive work environment and maximize productivity.
- An effective reporting system will support our efforts to foster a culture of integrity and ethical decision-making at Children's Colorado.

# Reporting – General

**May I report using either the Internet or the telephone?**

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

**What type of situations should I report?**

The EthicsPoint system is designed for team members to report any violation of laws, regulations, organizational policies, procedures, and/or Children's Colorado Code of Conduct, or any other concern you may have with compliance and/or ethics in the workplace.

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

It is everyone's right and responsibility to report any activity that appears to violate the Children's Hospital Colorado Code of Conduct or any laws, regulations, or Children's Colorado policies. You may make a report by speaking to your team leader or contacting the Corporate Compliance Program. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner thus we have partnered with EthicsPoint to provide secure and anonymous reporting options via telephone and online mechanisms.

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

We all have the right to work in a positive and ethical environment. With that right comes the responsibility of acting in a professional manner and notifying the appropriate personnel if there is a concern for violation of laws, regulations, organizational policies, procedures, and/or Children's Colorado Code of Conduct. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of our entire organization.

**Does Children's Colorado 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 team members. Also, offering constructive feedback may help identify issues that can improve compliance 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 the organization 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 EthicsPoint system offers open lines of communication, and allows us to assure a safe and secure mechanism to report concerns. Effective communication is critical in today's workplace and this serves as a helpful tool to enhance such communication.

We have carefully chosen the best reporting mechanism to meet our compliance obligations while maintaining an open, yet confidential reporting environment.

# Reporting Security & Confidentiality

**It is my understanding that any report I send from a Children's Colorado 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 your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during regular 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. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

**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 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 EthicsPoint website. 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 prefer.

## 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?**

Children's Colorado promotes ethical behavior. All unethical conduct, at any level, ultimately damages the organization and all team members, including you. If you know of any incidents of non-compliance, misconduct, and/or ethical violations, it is your responsibility to yourself, your colleagues, and the organization to make a report.

**I am not sure if what I have observed or heard is a violation of laws, regulations, Children's Colorado policies, procedures, and/or Code of 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 would rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you were unsure.

**What if my team leader or other leadership members 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 Children's Colorado has further questions for me concerning my report?**

When you file a report on 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. You may add more detail or answer questions posed by an organizational representative and include additional information that may help resolve open issues. We strongly suggest that you return to the site in the time specified to answer questions from Children's Colorado. You and Children's Colorado 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. Many public locations, including the public library, have Internet computers. If you do not have

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