



FREQUENTLY ASKED QUESTIONS (FAQ'S)

Ethics Compliance Confidential Reporting Tool

NAVEX GLOBAL™
The Ethics and Compliance Experts



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A. About Blythedale's EthicsPoint

What is EthicsPoint?

- Blythedale's EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why does Blythedale need a system like EthicsPoint to act as an extension of our Whistleblower policy?

- At Blythedale, we believe that our reputation is our most important asset. By creating open channels 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 can make a report?

- All Blythedale stakeholders, including but not limited to our employees and staff, trustees, suppliers, vendors and visitors.

B. Reporting – General

May I report using either the Internet or the telephone?

- Yes. With Blythedale's 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 any stakeholder to report any suspected violation of our Code of Conduct, or to any other policy or procedure. Some examples could include

unethical conduct, including but not limited to inappropriate activities at the hospital, billing for services not performed, improper activities related to the use of funds and fiduciary responsibility, or a violation of federal, state, or local laws.

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

- When you observe some suspicious behavior that you believe could put Blythedale at risk, we expect you to report it. Ideally, you should bring any concerns forward to your direct supervisor, or, if appropriate, another Cabinet member. 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 Blythedale has 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 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. Misconduct can threaten the entire Blythedale community.

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 Hospital - 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 Hospital and our patients.

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 Blythedale's Chief Compliance Officer, who will evaluate the report, based on the type of violation and location of the incident. The Chief Compliance Officer will keep these reports in the utmost confidence.

Will I get a reply or resolution on my report?

- Yes. 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 see replies and case resolution. In case the further details are needed, you will receive inquiries and feedback through this same communication channel. We strongly suggest that you return to the site in the time specified to answer company questions.

Isn't this system just an example of someone watching over me?

- The EthicsPoint 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.

C. Reporting Security & Confidentiality

Is any report I send traceable to my computer?

- 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 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 desk 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 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.

D. 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?

- Blythedale chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the Hospital and all stakeholders, 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 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.

www.blythedale.ethicspoint.com