



# Ethics and Compliance

# **About EthicsPoint**

#### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool utilized to assist management and employees in working to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

## Why do we 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 and maximize productivity.
- Providing a system such as EthicsPoint is considered "best practice"
- An effective reporting system will supplement our other efforts to foster a culture of integrity and ethical decision-making.

# **Reporting – General**

## Who can file a report?

Reports may be filed by anyone (staff, students, patients, volunteers, vendors, etc).

## 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 employees to report any violation of our stated Code of Conduct, policy and procedures, rules and regulations or other concern you may have; however, it is not a 911/emergency service.

# If I see a violation, should I first report it to my manager, security, or human resources and let them address the issue?

When you observe behavior that you believe violates our Code of Conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, HR or another member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. If that situation arises, EthicsPoint is another way that you can report incidences. All reports remain confidential and anonymous unless stated otherwise by the reporter. We would rather you report anonymously than keep the information to yourself.



## Why should I report what I know? What is in it for me?

We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correct wrongdoing wherever it may occur at OU Medicine. Each employee has an individual responsibility for reporting without fear of retaliation. By working together, we can maintain a healthy and productive work environment.

## Does leadership really want me to report?

We certainly do. In fact, we *need* you to report. You may have knowledge of an activity that may be cause for concern. Your reporting can <u>minimize</u> the potential negative impact on OU Medicine, our employees and the patients we serve.

## 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 the SVP Ethics and Compliance Officer and the Ethics and Compliance Department at OU Medicine. Each of these individuals has had training to ensure these reports are kept in the utmost confidence.

## Is this system 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. Effective communication is critical in today's workplace and this is a great tool to enhance that communication. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

# **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 will 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, or any smart phone through the EthicsPoint secure website.

# Can I file a report from home and remain anonymous?

Yes

# 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 Web site. These reports have the same security and confidentiality measures applied to them.

## What if I want to be identified with my report?

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

# **Miscellaneous**

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

OU Medicine promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees. If you know of any incidents of misconduct or ethical violations, it is your duty as an OU Medicine employee 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 does not look right to me. What should I do?

Report the conduct through your chain of command or HR. If you do not feel comfortable doing so, 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 continue because you were not sure.

# What if my leader or other managers are involved in a violation? Will they get the report? 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 on the EthicsPoint Web site or through the hotline, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system either by Internet or by telephone and access the original report to add more detail or answer questions posed by the party investigating the event. In approximately 5-7 business days, when logged back into the system, you will be able to view case updates and follow-up 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.

#### Can I still file a report if I do not have access to the Internet?

If you don't have access to the Internet, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.



# What if I am not comfortable speaking English?

EthicsPoint provides the ability to report in Spanish on the web portal. If you wish to report in a language other than English or Spanish, please use the EthicsPoint Hotline which provides 200 languages in which to report.

# How will I know that my report was received?

After 5-6 business days, you can log back into the system using your PIN and password. You will be able to see general information about the case status (e.g. in process or closed) as well as any questions or comments that have been posed by OU Medicine. Note that you are not able to see detailed information about the investigation or its outcomes.