

## About EthicsPoint

### What is EthicsPoint?

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 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.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

## Reporting – General

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

Yes. With EthicsPoint, you have the ability to file a 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 the NYU Langone Health Code of Conduct, or to seek guidance from the Compliance team on the Code or other compliance matters. This system should not be used to report Human Resources or Employee and Labor Relations matters, which should be directed to your manager, supervisor, department leadership, or the Human Resources/Employee and Labor Relations team.

### 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 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, or other member of your management team. 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. HIPAA or privacy related violations can always be reported directly to the helpline or to the Compliance Office directly.

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

All members of the NYU Langone Health workforce have a duty to report suspected or actual compliance concerns, as noted in the NYU Langone Health Compliance Concerns: Reporting, Investigating, and Protection from Retaliation policy. 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. Corporate misconduct can threaten the livelihood of an entire company or put our patients at risk.

#### **Does management really want me to report?**

Yes. In fact, we need you to report. You know what is going on in our institution - 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 institution and our people. Also, offering positive input may help identify issues that can improve corporate 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 to a team within the Office of Internal Audit, Compliance, and Enterprise Risk Management who are charged with evaluating the report, based on the type of violation and location of the incident. If you provide your name, the Compliance team does their best to not share your information if it is not needed to investigate or review the allegation. Sometimes your information must be shared in order to review the concern, but only those who need to know receive that information. You can choose to remain anonymous, but if you do so you must provide specific details on the events, including times, dates, names of individuals involved or aware, and witnesses. Otherwise the concern cannot be addressed.

#### **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.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

## **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.

**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.

**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.