



<b>What is EthicsPoint?</b>	EthicsPoint is an anonymous and confidential reporting system created by a third-party vendor, Navex Global, to assist WelbeHealth in addressing suspected fraud, waste and abuse, non-compliance and Code of Conduct violations in the workplace, all while reinforcing our values and cultivating trust and a positive work environment.
<b>Why do we need a system like EthicsPoint?</b>	<p>We believe that our team members are our most important asset in fulfilling our purpose. Part of fulfilling that purpose requires that we proactively and promptly address suspected compliance concerns.</p> <p>We've partnered with a third-party vendor to help us do that because:</p> <ul style="list-style-type: none"> <li>• Third-party management provides a secure method for people to submit concerns anonymously</li> <li>• Vendors that specialize in this area bring their expertise on effective reporting system design and reporting</li> </ul>
<b>May I report using either the Internet or the telephone?</b>	With EthicsPoint, you may submit a confidential, anonymous report by telephone or the Internet on the secure EthicsPoint Website.
<b>Do I have other reporting options?</b>	You always have the option to discuss concerns with your direct supervisor, your location's Compliance Officer or your Human Resources Representative. However, if you are not comfortable raising your concern through those channels, you can report your concern directly to EthicsPoint. It is critical we hear your concerns and feedback through one of these channels so that we may look into it and address it.
<b>What type of situations should I report?</b>	<p>Team members can report any suspected or actual violations of the Code of Conduct, policies and procedures, suspected fraud, waste and abuse, or other concerns you may have.</p> <p><b>Examples of potential incidents include:</b></p> <ul style="list-style-type: none"> <li>• E-mail or fax containing protected health information (PHI) sent to an unintended recipient</li> <li>• Participant not receiving services according to care plan</li> <li>• Participant not receiving required medications</li> <li>• Inaccurate or incomplete documentation</li> <li>• Incorrect medical coding and billing</li> <li>• Accepting a gift from a vendor, referral source or participant (family member)</li> <li>• Falsifying an expense report</li> <li>• Submission of claims for services not provided or supplies not delivered</li> </ul>



	<ul style="list-style-type: none"> <li>• Sharing confidential information about the organization with a competitor</li> <li>• Owning part of a business that sells items or services to the organization</li> <li>• Sending unsolicited marketing information (i.e. brochures, flyers, etc.) to potential enrollees</li> <li>• Providing gifts to induce enrollment</li> <li>• Eliciting payments from a provider, agency or facility in exchange for a program referral</li> <li>• Personal Protective Equipment not provided</li> <li>• Fire extinguisher or oxygen cylinder not secured</li> </ul>
<p><b>Where do EthicsPoint reports go?</b></p> <p><b>Who can access them?</b></p>	<p>All reported compliance concerns are entered directly into the EthicsPoint secure system to prevent any possible breach in security.</p> <p>EthicsPoint makes these reports available only to select WelbeHealth Compliance team members based on a pre-determined workflow and the type of violation and location of the incident. The WelbeHealth Compliance Team then oversees the evaluation of the report, determines what action is needed, and tracks the follow-through until the incident is closed.</p> <p>Each of the report recipients manages all reports in the utmost confidence.</p>
<p><b>I am concerned that the information I provide EthicsPoint will ultimately reveal my identity.</b></p> <p><b>How can you assure me that will not happen?</b></p>	<p>The EthicsPoint system is designed to protect your anonymity. You are not required to state your name or other identifying information unless you want to.</p> <p>It's important to note, however, that if you wish to remain anonymous, you -- as a reporting party -- <u>need to make sure that the information you type in does not reveal your identity by accident</u>. Examples of information that can reveal your identity are: "From my workstation next to Jan Smith..." or "In my 33 years as a recreational therapist..."</p>
<b>Is the telephone toll-free hotline confidential and anonymous too?</b>	Yes. You will be asked to provide the same information that you would provide in an Internet-based report and a third-party, independent interviewer enters your responses into the EthicsPoint system. Telephone reports have the same security and confidentiality measures applied to them during delivery.
<b>What if I want to be identified with my report?</b>	If you want to identify yourself, you may do so when submitting your concern via the website or by phone.
<b>I am not sure if what I observed</b>	Submit a report. The EthicsPoint system guides you on how to enter your concern so it can be properly understood. The WelbeHealth Compliance

<p><b>or heard is a violation of our organization's policy or involves unethical conduct, but it concerns me.</b></p> <p><b>What should I do?</b></p>	<p>department will look into your concern and make the decision on whether it is a violation or unethical conduct.</p> <p>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.</p>
<p><b>What if I remember something important about the incident after I file the report?</b></p>	<p>When you file a report, whether via the EthicsPoint Website or through the EthicsPoint Call Center, you receive a unique report key and will be 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 and answer any questions posed by an organizational representative that will help resolve open issues.</p> <p>Please note that there is a limited window to edit your report. We strongly suggest that you return to the site in the time specified to answer any questions. Your dialogue with the organizational representative is an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.</p>
<p><b>What if the organization has further questions for me concerning my report?</b></p>	<p>You may be asked follow-up questions. If you have chosen to remain anonymous, don't worry. The compliance representative will post follow-up questions through the Website and the Website will generate a message to you in a way that the WelbeHealth compliance representative can't see who you are. We strongly suggest that you return to the site in the time specified to answer any questions. Your dialogue with the organizational representative is an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.</p>
<p><b>Are follow-up communications on reports as secure as the first one?</b></p>	<p>All EthicsPoint communications are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.</p>
<p><b>When can I expect a response back from my report?</b></p> <p><b>What happens once a report is submitted for</b></p>	<p>Once a report is submitted, a WelbeHealth's Compliance representative acknowledges receipt of the report or inquiry by responding to the reporter within 2 business days and immediately begins a comprehensive review of the issue. If necessary, the representative may ask additional questions for clarification or to obtain more information. At the conclusion of an investigation, the representative notifies the reporter that the investigation has concluded, and appropriate actions were taken (if</p>



<b>suspected incidents?</b>	warranted). Due to the confidential nature of investigations, specific details cannot be shared.
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