Hotline FAQs About EthicsPoint Reporting – General Reporting Security & Confidentiality Tips & Best Practices

Hotline FAQs

United Way of Greater Cleveland's Hotline is intended to help staff members identify and address compliance concerns (e.g., financial, HIPAA, safety matters, etc.) making a confidential report either through the EthicsPoint Web site or by calling the EthicsPoint Call Center toll-free number (844-936-2716). This includes concerns related to compliance with COVID-19 health and safety standards (e.g., compliance with personal protective equipment, social distancing, and cleaning and disinfecting standards).

The online and telephone reporting service is not maintained on the organization's system and is not maintained by United Way employees. A staff member may provide their name and contact information or may choose to remain anonymous.

EthicsPoint, an independent, third party reporting service provider for the organization's hotline, is available to staff members 24 hours a day, seven days a week, every day of the year.

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global that enables management and employees to work together to address fraud, abuse, and other misconduct in the workplace while cultivating a positive work environment.

Why Does United Way of Greater Cleveland have a Hotline? Don't we have other channels of communication for these types of concerns? Why do we need a system like EthicsPoint?

- Our employees are our most important asset. By creating open channels of communication, we promote a positive work environment and maximize productivity.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.
- United Way of Greater Cleveland is committed to conducting business ethically and complying
 with applicable federal and state laws and regulations. An important aspect of that commitment
 is the availability of the confidential reporting 'hotline' operated by EthicsPoint, an independent
 reporting service. The 'hotline' provides a mechanism by which staff members may
 anonymously raise concerns about the compliance of the organization or
 individual staff members with UWGC policies, legal and regulatory requirements, or the Code of
 Ethics.

- There are a variety of channels of communication for expressing compliance concerns and resolving them. Typically, a possible violation of UWGC policy, legal or regulatory requirements, or the Code of Ethics is resolved by a staff member referring the concern to a supervisor or to a person of greater authority within the organizational structure. Alternatively, a staff member may choose to report an issue to Human Resources and/or the President and CEO.
- As another option, if a staff member does not feel comfortable speaking with a supervisor or other resource, or where a staff member desires anonymity, the United Way of Greater Cleveland's Hotline is available to the staff member to bring the concern to the organization's attention.
- Please note that any staff member who brings an issue to the organization's attention through the Hotline or otherwise should be aware that UWGC policy prohibits retaliation against staff members who in good faith report possible violations of UWGC policy, the law, or the Code of Ethics.
- Communication is still important. The Hotline is not intended to be a substitute for meaningful communication between you and your supervisor or with Human Resources. If you have questions or concerns regarding normal operating procedures or suggestions for making your workplace more comfortable or efficient, please bring directly to them.

Reporting – General

How do I reach the Hotline?

There are two options:

- 1. Calling the EthicsPoint Call Center toll-free number 844-936-2716
- 2. Online reporting www.uwgchotline.ethicspoint.com

What types of situations should I report?

- The EthicsPoint system allows employees to report any violation of our stated Code of Ethics, or other concern you may have.
- Some examples of situations that you may want to call or make an online report to the organization's Hotline are:
 - Bullying in the Workplace
 - Compliance with COVID-19 health and safety standards
 - Conflict of Interest
 - Disclosure of Confidential Information
 - Discrimination or Harassment
 - Donor Stewardship
 - Falsification of Contracts, Reports or Records
 - Fraudulent or inaccurate financial reporting
 - HIPAA / PHI Non-compliance
 - Misconduct or Inappropriate Behavior
 - Safety
 - Theft
 - Violation of Policy
 - Other

Can I use the Hotline to make reports concerning COVID-19?

• Yes. Concerns related to compliance with COVID-19 health and safety standards (e.g., personal protective equipment (facial coverings), compliance with social distancing, and cleaning and disinfecting standards) can be reported using the Hotline. Questions about your return to the office building should be directed to Human Resources.

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

When you observe some behavior that you believe violates our code of ethics, we expect you to
report it. Ideally, you should bring any concerns forward to your direct manager or other
member of our 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 NAVEX Global to utilize EthicsPoint. We would rather you report
anonymously than keep the information to yourself and not report the concern at all-

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 in a manner that is contradictory to these expectations. By working together, we can maintain a healthy and productive environment. Misconduct can threaten the very existence of an entire organization.

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 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 people. Also, offering positive input may help identify issues that can improve organizational culture and performance.

What happens when I call or make an online report to the Hotline?

- A report filed via the Hotline is taken by EthicsPoint, an independent, third-party vendor, not a United Way employee. When you call the EthicsPoint Hotline, a trained Call Center Communication Specialist will gather information regarding the issue being reported. For online reports, the information entered the website is automatically generated into a report.
- The vendor will then promptly forward a detailed report to Vice President, Human Resources and Operations who will coordinate a review of the issue. The organization will investigate and take appropriate action regarding all issues reported through the Hotline. The more complete the information you provide, the more thoroughly and quickly the organization can investigate and resolve your concern.

Do I have to give my name when I call or make an online report to the Hotline?

- No. If you wish to remain anonymous, the EthicsPoint Call Center Communication Specialist or EthicsPoint website will provide you with a unique randomized number called a "Report Key" after you create your own password. It is recommended that you check in 5 business days after submitting your report to see if there is any follow-up. (This enables communication between you and the organization while maintaining your anonymity).
- If you provided your email to contact you, you would receive an email letting you know there is follow-up required.

• You are also free to call the Hotline back at any time. By providing the unique randomized number called a "Report Key" and the password you created during your initial call–when completing the web intake form, you will be able to communicate additional information relevant to the reported issue.

Is anonymity guaranteed?

• The information provided by you may be the basis of an internal and/or external investigation into the issue(s) you report, and your anonymity will be protected to the extent possible. However, your identity may become known during the course of the investigation.

What happens if I remember something important about the incident after filing the report? Or what if the organization has further questions concerning my report?

- When you file a report, the EthicsPoint Communication Specialist or website will provide you
 with a unique randomized number called a "Report Key" after you create your own password. It
 is recommended that you check in 5 business days after submitting your report to see if there is
 any follow-up. (This enables communication between you and the organization while
 maintaining your anonymity).
- If you provided your email to contact you, you would receive an email letting you know there is follow-up required.
- You are also free to call the Hotline back at any time. Providing the unique randomized number called a "Report Key" and the password you created during your initial call or when completing the web intake form, you will be able to communicate additional information relevant to the reported issue.

Where do these reports go? Who can access them?

• Reports are entered directly on the EthicsPoint secure server. NAVEX Global makes these reports available only to Human Resources who are charged with evaluating the report, based on the type of violation or incident.

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

No. EthicsPoint is a positive aspect of our overall philosophy that allows us to ensure 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.

What about retaliation for making the report?

- Organizational policy prohibits retaliation against staff members who in good faith report apparent violations of UWGC policy, the law, or the Code of Ethics.
- Any employee who engages in retaliation or harassment against an employee reporting a violation in good faith is subject to discipline, up to and including termination. All reported concerns are presumed to be in good faith unless established otherwise.
- Knowingly false allegations are prohibited. United Way will take appropriate action if it is determined that deliberately false accusations have been made.

How can I check on an anonymous report I previously filed?

• To follow-up on an anonymous report, you can call the Hotline at 844-936-2716 or the website using your randomized number called a "Report Key" and the password you created.

What if I forgot my Report Key or forget the Password?

• Unfortunately, if you have lost or forgotten your unique, randomized number called a "Report Key" and the password you created, you will need to create a new report. For security and confidentiality reasons, the vendor is not permitted to retrieve lost report numbers or passwords.

What happens with my report?

- The organization will review every report to the hotline. An investigation will be conducted by Human Resources if a review establishes that the allegation constitutes unethical or illegal activity, and if it is supported by specific information or corroborating evidence. Other departments may become involved in investigations based on their areas of oversight responsibility or expertise.
- Efforts will be made to perform investigations discreetly. The details of the investigation will be kept confidential, to the extent feasible, and consistent with organizational policies and applicable federal, state, and local laws.

What can I expect regarding resolution?

• The organization is committed to conducting an appropriate and timely response to each report submitted through the hotline, as well as appropriate and timely closure to those allegations which proceed to the investigation process.

Security & Confidentiality

It is my understanding that any report I send from an organizational computer generates a server log that shows every website that my PC connects with. Won't this log identify me as the report originator?

- NAVEX Global does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.
- 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 or at a friend's house) through the EthicsPoint secure website. Many people choose this option, as NAVEX Global's data shows that fewer than 12% of reports are generated during business hours.
- You also have the option to call the EthicsPoint Call Center toll-free number (844-936-2716) and provide your report to an EthicsPoint Communication Specialist.

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 completely maintained.

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 protects 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 Internetbased 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 to identify yourself if you wish. It is helpful to the organization to be able to discuss the report with the employee directly during a review of the issue.

Tips & Best Practices

I am aware of some individuals acting unethically, but it doesn't not affect me. Why should I bother reporting it?

• Our organization promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the organization and all employees, including you. 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 organizational policy, or involves unethical conduct, but it just does not look right to me. What should I do?

• File a report. NAVEX Global 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.

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 ensure 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 organization 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, randomized number called a "Report Key" 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 an organization representative. We strongly suggest that you return to the site periodically to check on inquiries to questions. You and the organization 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.

What if I lose my Report Key or forget the Password I created?

• To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

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 do not 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.