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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global that enables Open Door's management and employees to work together to address fraud, waste, abuse, mistakes, and other errors and misconduct in the workplace while cultivating a positive work environment. It is an incident reporting system which also enables Open Door's employees and patients to report complaints, grievances, concerns or unusual events they wish to bring to the attention of management.

Why do we need a system like EthicsPoint?

- Our employees and our patients 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.

Reporting – General

May I report using either the Internet or the telephone?

Yes. *EthicsPoint* enables you to file a confidential, anonymous report either through the telephone or the Internet.

What types of situations should I report?

The *EthicsPoint* system allows Open Door's employees and patients to report any violation of the law, regulations, our Code of Conduct, and policies and procedures or other concern they may have.

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 the law, regulations, our Code of Conduct, and policies and procedures, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or a 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. We would rather you report securely or 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. And, a deviation from our policies and procedures and best practices can threaten our mission and commitment to the patients and the community we serve.

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 company - You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company, our staff or our patients. 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. NAVEX Global makes these reports available only to specific individuals within the company who are charged with evaluating the

report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

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.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company 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.

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

A report from home 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.

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 and management is required to protect your anonymity for good-faith reporting of incidents.

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 to identify yourself, if you wish.

Tips & Best Practices

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

Open Door promotes safe and ethical behavior. We are committed to best practices in healthcare. Inappropriate and unethical conduct, at any level, ultimately hurts the company, its employees and patients, including you. It is our collective responsibility to protect Open Door's reputation as a responsible corporate citizen. If you know of incidents of misconduct or ethical violations, consider it a duty to yourself, your coworkers, the patients we serve, and our community, to report it.

I am not sure if what I have observed or heard is a violation of Open Door policy, or involves inappropriate or 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'd rather you report a situation that turns out to be harmless than let possible unsafe or unethical behavior go unchecked.

What if my supervisor 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 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, 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 Open Door representative. We strongly suggest that you return to the site in the time specified to answer such questions. You and the designated Open Door representative 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?

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.