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## About EthicsPoint

### What is EthicsPoint?

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

You are encouraged to use this Helpline, hosted by third party provider, EthicsPoint, to submit reports relating to potential or actual violations of law, regulation, or behavior that is not in alignment with our Code of Business Practices.

### Why do we need a system like the Helpline?

- 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. The Helpline enables you to file a confidential, anonymous report via either the telephone or the Internet.

## What types of situations should I report?

The Helpline system allows employees to report any violation of our applicable laws, regulations, professional standards and policies, or other concerns you 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 an issue that you believe violates our our applicable laws, regulations, professional standards and policies, we expect you to report it. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue to someone directly. It is for such circumstances that we have partnered with NAVEX Global. We would rather you report anonymously than keep the information to yourself.

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

At Nemours, compliance is everyone's responsibility. The trust of our patients, their families, our associates and our business partners depends on our integrity. We are committed to carrying out our roles and responsibilities as they relate to our business practices in accordance with the highest ethical standards and applicable laws, regulations, professional standards, and policies. Nemours takes all compliance concerns seriously and appreciates individuals who raise them.

## Does Nemours really want me to report?

We certainly do. In fact, we *need* you to report. We need to know what is going on in our company - 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 company 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. NAVEX Global makes these reports available only to specific individuals within Nemours 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. The Helpline 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 is a third-party vendor and does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to the Helpline 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 Nemours Helpline EthicsPoint secure website.

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

A report from outside the Nemours network 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. 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 Helpline 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 Nemours Helpline 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 unethically, but it doesn't affect me. Why should I bother reporting it?**

At Nemours, compliance is everyone's responsibility. The trust of our patients, their families, our associates and our business partners depends on our integrity. We are committed to carrying out our roles and responsibilities as they relate to our business practices in accordance with the highest ethical standards and applicable laws, regulations, professional standards, and policies. Nemours takes all compliance concerns seriously and appreciates individuals who raise them.

**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. The Helpline 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.

**What if my boss or other managers are involved in a violation? Won't they get the report?**

The Nemours Helpline system and report distribution ensure that implicated parties are never 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 with the Nemours Helpline website or through the telephone Helpline, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the Helpline system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer company 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.

**Are these follow-ups on reports as secure as the first one?**

All Helpline 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 Helpline 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 Helpline toll-free, 24 hours a day, 365 days a year.