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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX that enables management and employees to work together to address alleged fraud, abuse, and other misconduct in the workplace while fostering a culture of compliance.

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, compliant and ethical work environment.
- An effective reporting system augments our other efforts to foster a culture integrity, respect, and accountability.
- Compliance is everyone's responsibility.

Reporting – General

May I report using either the Internet or the telephone?

Yes. EthicsPoint enables you to submit a confidential, anonymous report via either the telephone or the Internet.

What types of situations should I report?

The EthicsPoint system allows employees to report any violation of our Code of Conduct, or any laws, regulations or organizational policies. Do not use this site to report events presenting an immediate threat to life or property. If you require emergency assistance, please dial 155 for emergencies on a hospital campus or 911 for emergencies at offsite locations.

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

Compliance is everyone's responsibility! 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, other member of your management team, or Human Resources. 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. 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?

Compliance is everyone's responsibility! We all have the right to work in a positive, compliant and ethical 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, corporate misconduct can threaten the very existence of an entire organization.

Does management really want me to report?

Yes! 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 our organization 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 makes these reports available only to specific individuals within the Office of Privacy and Corporate Compliance, who are charged with evaluating the report, based on the type of concern 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.

Reporting Security & Confidentiality Concerns

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 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's data shows that fewer than 12% of reports are generated during business hours.

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

Yes. 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 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 will 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...". Please keep in mind, the information provided by you may be the basis of an internal and/or external investigation into the issue(s) you report, and your identity may become known during the course of the investigation. The OPCC and collaborating departments will protect your anonymity to the extent possible, but cannot guarantee anonymity in all situations.

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 website. These reports have the same security and confidentiality measures applied to them.

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?

Compliance is everyone's responsibility! Our organization promotes ethical behavior. All unethical conduct, at any level, ultimately hurts our organization and all of our employees, including you. You only have to consider what has happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy organization. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself, your coworkers, patients, and community to report it.

I am not sure if what I have observed or heard is a violation of our organization's policy, or involves unethical conduct, but it just does not look right to me. What should I do?

Submit a report. NAVEX can help you prepare and submit 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 and start a cover-up?

The EthicsPoint system and report distribution process 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 submit the report? Or what if the organization has further questions for me concerning my report?

When you submit 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 a member of the OPCC team. You are encouraged to return to the site in the time specified to answer and clarify 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 submit a new report. Mention in the new report that it is related to a report or question you previously submitted.

Can I still submit 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. You can also submit an EthicsPoint report from any computer that can access the Internet. If you have Internet at home, then you can submit your report from the comfort of your own home. Also, many public locations, including the public library, have computers with Internet access.