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The Point32Health Hotline

What is the hotline?

The Point32Health hotline allows colleagues and external customers to report concerns about potential noncompliance; fraud, waste and abuse (FWA); and other behavior not consistent with our Code of Conduct. The hotline tool is called EthicsPoint and is available by a toll-free phone number and a secure website. The hotline reporting is available 24 hours a day, 7 days a week, 365 days a year. Reports of suspected noncompliance and FWA can be made anonymously.

Why do we need a hotline like this?

- Our colleagues are the most important piece of our compliance program. By creating open channels of communication, we promote trust and a positive, ethical work environment, which helps to maximize productivity.
- An effective reporting system enhances our efforts to foster a culture of integrity and ethical decision-making.

About EthicsPoint

Who is NAVEX Global?

NAVEX Global is an external vendor that provides a hotline for Point32Health colleagues and external customers to report concerns about potential noncompliance and fraud, waste and abuse (FWA). The hotline tool is called EthicsPoint.

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential management tool created by NAVEX Global that enables individuals to report concerns about noncompliance, FWA, and other behavior not consistent with our Code of Conduct.

Reporting – What and Why

May I report using either the Internet or the telephone?

Yes, you can file a confidential report by telephone or through a secure website. Anonymous reporting is also available through either option.

What types of situations should I report?

Individuals should report any known or suspected violations of standards in our Code of Conduct, federal and state laws or regulations, suspected or known instances of fraud, waste and abuse, or other ethical concerns you may have.

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

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 to your direct supervisor or other member of our management team. We recognize, however, there may be circumstances when you are not comfortable reporting the issue in this manner. In those situations, you can report to the hotline confidentially and anonymously. 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?

As outlined in the Code of Conduct, individuals are required to report any suspected or potential compliance issues or FWA. We all have the right to work in a positive environment. With that right comes the responsibility to act in an ethical manner and let the appropriate people know if something improper may be happening. By working together, we can maintain a lawful, ethical and productive environment.

Does management really want me to report?

Yes, you 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. Also, offering positive input may help identify issues that can be addressed to improve corporate culture and business performance.

Where do these reports go? Who can access them?

Individuals enter a report directly on the hotline's secure website or through the toll-free telephone number. These reports are available only to specific individuals within the Point32Health Compliance Department who are responsible for investigating and tracking all received reports. Each of these individuals has had training in managing reports confidentially.

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

No. The Point32Health Hotline is a positive aspect of our overall philosophy of open communications, which helps us to ensure a safe, secure and ethical workplace. We encourage you to seek guidance on ethical dilemmas or communicate a concern. The hotline provides the option to report anonymously and is available 24 hours a day, 7 days a week, 365 days a year.

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

Point32Health relies on our colleagues to behave ethically. All unethical conduct, at any level, ultimately hurts the company and all colleagues, including you. If you know of any incidents of misconduct or ethical violations, it is your duty to yourself and your co-workers to report it.

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?

Ideally, you should bring any concerns forward to your direct supervisor or other member of our management team. If you are not comfortable doing so, you may file a report. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

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?

Point32Health logs all visits to websites but does not track what activity you do on a site. NAVEX Global (EthicsPoint) does not generate or maintain logs with IP addresses.

If you feel uncomfortable making a report through the hotline's secure website on your work device, you have the option of using a device outside our work environment (such as one located at library or friend's house).

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

You can file a report on the hotline's secure website from any computer that can access the Internet. A report from home, a neighbor's computer or any Point32Health device will be handled confidentially between EthicsPoint and the Compliance department.

For reports from non-Point32Health devices, the hotline strips away Internet addresses so the sender cannot be identified. If you are not using a company device to make a hotline report, please be sure that no sensitive company or confidential member or individual information is retained on that device.

I am concerned that the information I provide on the hotline will ultimately reveal my identity. How can you assure me that will not happen?

The hotline 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, do not include details like "From my cube next to Jan Smith..." or "In my 33 years..." in your report.

Is the telephone toll-free hotline confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report. An interviewer will type your responses into the hotline's secure website and review them with you. Telephone reports have the same security and confidentiality measures as if you accessed the website directly.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The hotline system and report distribution rules ensure that implicated parties are not notified or granted access to reports in which they have been named. If the issue is related to noncompliance with the Point32Health Code of Conduct, the report is referred to Human Resources and Legal. Point32Health maintains a non-retaliation policy for retribution against any colleague or customer who in good faith reports suspected noncompliance or FWA.

What if I want to be identified with my report?

There is a section in the report to identify yourself, if you wish.

Follow-up to Reports

What happens after I file my report? Will I know if there's an investigation?

When you file a report through the telephone or web hotline, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the hotline, either by Internet or telephone, to see the status of any investigation or to answer further questions from Point32Health representatives.

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 through the telephone or web hotline, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the hotline, either by Internet or telephone, and access the original report to add more detail or answer questions posed by a Point32Health representative. We strongly suggest that you return to the site in the time specified to answer any follow-up questions. Your anonymity will be maintained as you communicate through the secure site.

Are follow-ups on reports as secure?

All hotline correspondences are held in the same confidence as the initial report.

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.