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About EthicsPoint

1. What is EthicsPoint?

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

2. Why do we need a system like EthicsPoint?

- Our employees are very important to us. By creating open channels of communication, we promote a positive work environment and maximize productivity.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making amongst ourselves and business partners.

Reporting – General

3. May I report using either the Intranet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report by telephone or through an online form on the Intranet.

4. What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our stated Code of Conduct, or other concern or question you may have.

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

When you observe 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, 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 Southcoast Health has partnered with NAVEX. We would rather you report the concern or matter directly to Corporate Compliance via Navex with your contact information or anonymously than keep the information to yourself.

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

We all have the right to work in a positive environment. 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.

7. 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 Southcoast Health, our patients and our people.

8. 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 Southcoast Health who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has received training in keeping these reports confidential.

9. 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, and communicate concerns. 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

10. It is my understanding that any report I send from a Southcoast Health computer generates a server log that shows every website that my PC connects with, and won't this log identify me as a 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, at a friend's house, etc.) 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.

11. 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 maintained.

12. 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 is designed to protect 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...."

13. Is the toll-free telephone helpline confidential and anonymous as well?

Yes. You will be asked to provide the same information that you would provide in an online report. An interviewer will type your responses into the EthicsPoint Web site. Reports made by telephone have the same security and confidentiality protocols as reports made online.

14. What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish. We encourage you to provide your contact information so we can communicate with you and properly investigate. Anonymous reporters may inadvertently leave out relevant and important details that impacts the investigation and outcome.

Tips & Best Practices

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

Our organization promotes ethical behavior. All unethical conduct, at any level, ultimately hurts Southcoast Health and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy organization. So, if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

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

File a report. NAVEX 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 because you weren't sure.

17. 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 are designed so that implicated parties are not notified or granted access to reports in which they have been named.

18. What if I remember something important about the incident after I file the report? Or what if the Southcoast Health has further questions for me concerning my report?

When you file a report at the EthicsPoint website 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 Southcoast Health representative. We strongly suggest that you return to the site in the time specified to answer questions. You and Southcoast Health now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

19. 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.

20. 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.

21. Can I still file a report if I don't have access to the Intranet?

You can file an EthicsPoint report from any computer or mobile device that can access the Intranet. You can file from home. Additionally, 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 EthicsPoint toll free hotline, which is available 24 hours a day, 365 days a year