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About EthicsPoint

What is EthicsPoint from Navex?

Path has contracted with Navex to create a comprehensive and confidential reporting tool that enables leaders, team members and contractors to work together to address fraud, abuse, and other misconduct in the workplace while cultivating a safe work environment. This tool is called EthicsPoint.

Why do we need a system like EthicsPoint?

- Our team members and contractors are our most important asset. By creating open channels of communication, we promote a positive work environment and maximize safety for our company and our patients.
- An effective reporting system augments our other efforts to foster a culture of integrity, compliance, and ethical decision-making.

Reporting – General

How do I make a report?

EthicsPoint from Navex enables you to file a confidential, anonymous report via either the telephone or the Internet.

What types of situations should I report?

The EthicsPoint system allows team members or contractors to report any violation of our Code of Conduct, Employee Handbook or other concern you may have.

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

When you observe or discover a behavior that you believe violates our code of conduct or employee handbook (for Path team members), 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 we have partnered with Navex to provide EthicsPoint. 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?

We all have the right to work in a safe, 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. And, corporate misconduct can threaten the very existence of an entire company. By working together, we can maintain a healthy and productive environment.

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 - 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, our people and our patients. Also, offering input may help identify issues that can improve our 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 company who are charged with evaluating the

report based on the type of violation and location of the incident. For example, HIPAA concerns go to our Privacy Officer. Fraud, waste and abuse concerns go to the Compliance Officer. Harassment concerns go to People Operations. 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. It's actually the opposite! We are asking you to Say Something if you see something. 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 our 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 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 or via the telephone.

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 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 meeting on 6/2 with Jan Smith..." or "In my 33 years...".

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 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. The EthicsPoint toll-free hotline is available 24 hours a day, 365 days a year.

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?

Our company promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees and contractors, including you. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your colleagues 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?

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.

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 ensures 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? 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 a company representative.

What if the company has further questions for me concerning my report?

We strongly suggest that you return to the site using your Report Key in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations can be further discussed without revealing your identity (if you choose to remain anonymous).

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

Yes. All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity with no connection to your IP address or name.

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.