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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 or patients to work together to address fraud, abuse, and other misconduct, while cultivating a positive work environment.

### 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 work environment and maximize productivity.
- We value our patients and want to see our patients thrive in our facilities. What patients see from their perspective is important to us and helps us maintain integrity.
- We also want to hear from our vendors, contractors, affiliated providers, and others about how we may best support a positive culture of compliance and ethics in our facilities.
- 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. EthicsPoint 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 employees, patients, vendors, and others to report any violation of our stated Code of Conduct, or other concern you may have.

## If I see a violation, shouldn't I just report it to my manager, security, the front desk, 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. We have partnered with NAVEX so you may confidently report a concern or ask a question without feeling pressure from local staff. You also have the option to report anonymously through the Navex system. 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 and receive treatment in a 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 with integrity. By working together, we can maintain a healthy and productive environment. And, corporate misconduct can threaten the very existence of an entire company.

## 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 facilities - 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 patients, and our people. Also, offering positive input or asking questions may help identify issues that can improve 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. Each of these report recipients has had training in keeping these reports in the utmost confidence.



# Reporting Security & Confidentiality

## **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. If you choose to be anonymous, please provide as much detail as possible about the situation. It is also your responsibility to check back on the case to see if the investigator has asked any questions or needs additional information.

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

NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

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...". In addition, you are responsible for checking back on the case to see the status and if the investigator has asked any questions or needs additional information.

## **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 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.

## **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, patients, vendors, and all employees. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy company. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself, your care team, or your coworkers 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 ensure that implicated parties are not notified or granted access to reports in which they have been named. In addition, the investigator will take any possible steps to keep your name confidential.

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