

Compliance Hotline Reporting – General Reporting Security & Confidentiality Tips & Best Practices

Compliance Hotline

What is the Compliance Hotline?

The Compliance Hotline is a comprehensive and confidential reporting tool created by NAVEX that enables management and team members to work together to address fraud, abuse, and other misconduct in the workplace while cultivating a positive work environment.

Why do we need a system like the Compliance Hotline?

- Our team members are our most important asset. By creating open channels of communication, we promote a positive work environment and maximize productivity.
- 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. Brookwood Baptist Health enables you to file a confidential, anonymous report via either the telephone or the Internet.

What types of situations should I report?

Our system allows team members to report any violation of our Code of Conduct, or other concern you may have. Immediate and urgent concerns related to patient care or team member safety should be raised through your leadership team or by calling 911.

If I see a violation, shouldn't I just report it to my manager, security, 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 forward to your supervisor 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. 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 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. 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?

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 the company and our people. Also, offering positive input may help identify issues that can improve organizational culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly into the Compliance Hotline's secure server. NAVEX makes these reports available only to specific individuals within the organization 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.

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

No. The Compliance Hotline 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.

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 the Compliance Hotline 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 a friend's house or via your mobile device) through the Compliance Hotline's secure website.

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 Compliance Hotline system strips away Internet addresses so that anonymity is totally maintained.

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

The Compliance Hotline 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..."

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 Compliance Hotline system. These reports have the same security and confidentiality measures applied to them during delivery.

Does someone who works for Brookwood Baptist Health answer the phone?

No. The Compliance Hotline is staffed by trained professionals who work for an outside independent organization - NAVEX.

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 organization and all employees, including you. 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 and 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 Compliance Hotline system and report distribution 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 file the report? Or what if Brookwood Baptist Health has further questions for me concerning my report?

When you file a report at the Compliance Hotline's website or through the Compliance Hotline Call Center, you receive a unique, randomized number called a "report key" and are asked to choose a password. You can return to the Compliance Hotline system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative.

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

All Compliance Hotline 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 a Compliance Hotline report from any computer or mobile device 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 Compliance toll-free Hotline, which is available 24 hours a day, 365 days a year.