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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool to assist Colonial Management Group LP, its individual Treatment Centers, staff members, and patients to work together to address fraud, abuse, and other misconduct in the at all levels of the organization.

Why do we need a system like EthicsPoint?

- We believe that our patients and staff members are very important to our business. By creating open channels of communication, we can promote a positive environment.
- An effective reporting system will augment 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. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

What type of situations should I report?

The EthicsPoint system is designed for our patients and staff members to report any violation of our stated Code of Business Conduct & Ethics, or other concerns you may have related to ethical incidents that have occurred inside of the clinic or inside/outside office environment.

If I see a violation or if an incident occurs, shouldn't I just report it to the Program Director, his/her Supervisor, or human resources and let them deal with it?

When you observe some behavior that you believe violates our Code of Business Conduct & Ethics, we expect you to report it. Ideally, you should bring any concerns forward to the clinic's Program Director, Regional Director, Compliance, Human Resources or any 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 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?

. By working together, we can maintain a healthy and productive environment. Organization misconduct can threaten the livelihood of the entire organization.

Does Colonial Management Group LP really want me to report?

We certainly do. In fact, we *need* you to report.. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the organization..

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the organization who are charged with evaluating the report, based on the type of violation, incident 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?

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical organization. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in the organization 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 an organization or personal computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

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. Plus, as a reminder, EthicsPoint is contractually committed not to pursue a reporter's identity.

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.

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 for identifying yourself, if you wish.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Our organization chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the organization, staff members and patients.

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. EthicsPoint 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.

What if the clinic in which I seek treatment, a Supervisor/Manager or other managers are involved in a violation or incident? 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.

What if I remember something important about the incident after I file the report? Or what if the organization 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 user name 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 an organization representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer organization questions. You and the organization 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.

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.