

2022

Compliance & Ethics Solutions



Our Mission

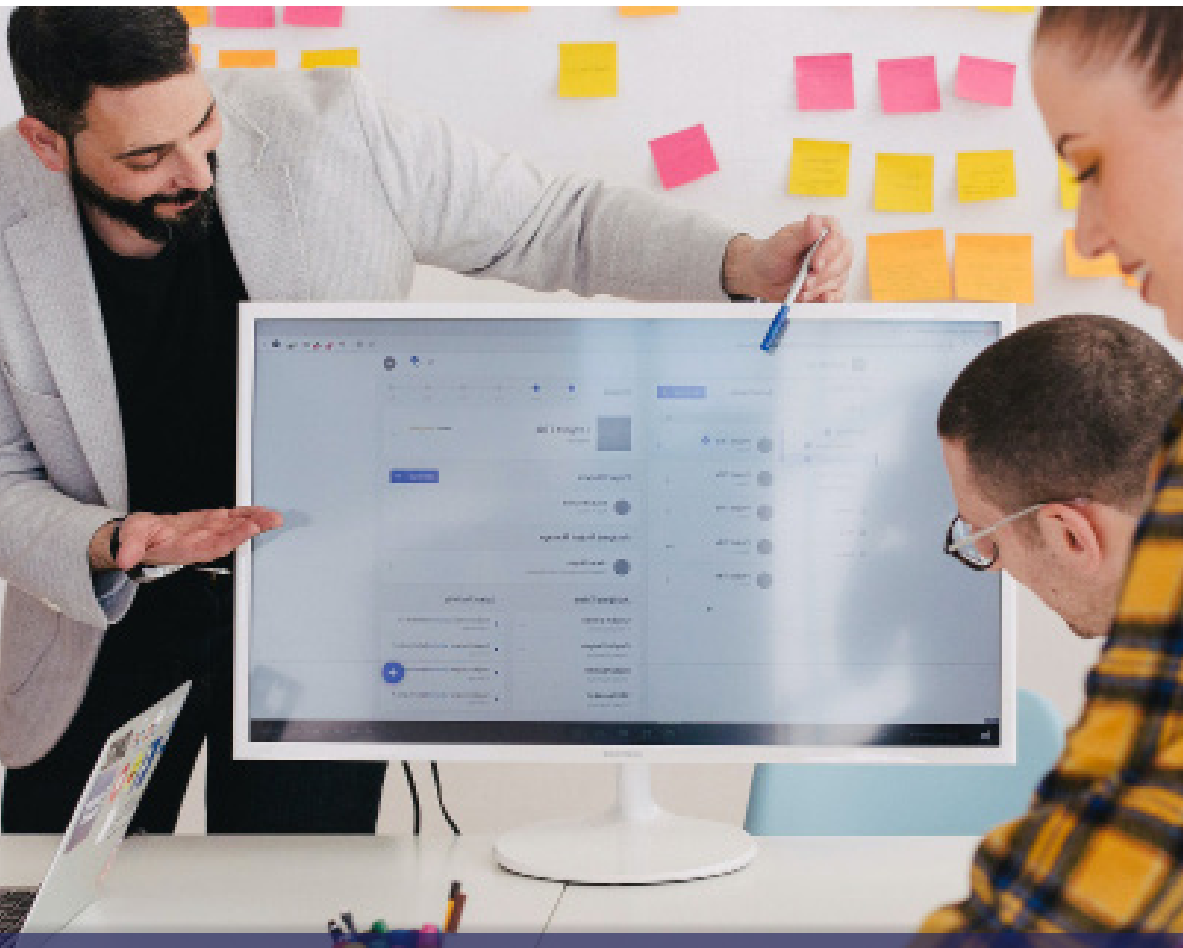
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It may never have crossed your mind to consider the mission of your ethics vendor. But we think it matters a lot. Our driving purpose to make the world a better workplace shows up in everything we do: the diversity that drives our innovation, the service that allows you to build your ROI, the understanding of what matters to compliance professionals on a day-to-day basis, and software which makes you more effective... just to name a few.

Many vendors won't state it explicitly, but their mission seems to be to acquire as much of your compliance budget as possible. While we certainly hope your invoice checks cash, each department in each division of our company is united around in giving you the tools and insights to take the best care of your people!

INTEGRATED COMPLIANCE REPORTING



HELPLINE

24 / 7 anonymous, secure, and caring reporting with the detail you need

WEB REPORTING

Accept reports for any incident with custom guided prompts from any device

CASE MANAGEMENT

A highly configurable platform makes it easy to manage complex investigations and coordinate across teams

ETHICO

Gain the information, control, and effectiveness to guide your compliance program to success.

You can't fix it if you don't know about it. So make sure your transparency and reporting initiatives are getting the care they deserve with CL solutions.

WHY CHOOSE US?

Built by compliance professionals, we understand your needs

- All calls answered LIVE (no call queues used) 24/7/365
- Immediate notification 24 hours a day for severity situations
- Custom call greeting and directives ensure calls are handled YOUR way
- Online case management for reporting and analysis (MyCM)
- Each high quality, actionable report is quality reviewed
- Web reporting forms for flexible case intake across devices
- Built on service, we work hard to earn your business every day
- We serve as a true extension of your unique ethics & compliance program
- <1% Gross abandonment rate (compared to the 12-20% industry average)
- International access via direct toll-free or international toll-free (compliance included)

SERVICE OVERVIEW

Confidential, professional, and actionable reporting channel that encourage employees to voice compliance, ethics, and regulatory concerns without fear of retribution is an integral component of an effective compliance program. Ethico adapts the reporting process to get the right information. With Ethico you can take action while promoting transparency and assuring callers of a comprehensive and secure (or anonymous) reporting process. With the best service in the industry, we act as an integral component of our clients' compliance programs and provide an avenue for employees and other stakeholders to report the concerns and violations you want to know about.

QUALITY COMPLIANCE SOLUTIONS FOR 20 YEARS

Ethico provides risk-conscious leaders with transparency into issues that might threaten safety, culture, and reputation.

Your 24-hour toll-free hotline, tailored web intake form, mobile reporting app, and integrated case management software pinpoint concerning activities and provide you with comprehensive reports so you can take action.

RISK TEAM

Calls are received 24/7/365 by risk-conscious elicitation experts, skilled in the art of interviewing and documenting ethics and compliance information. Each new rep must complete 120 hours of in-house training before ever being allowed to field live calls for our clients. They are taught a comprehensive, adaptive interview techniques based on professionalism and empathy for every caller. Actionable reports that provide the information you need to begin your investigations allowing you to address risk and close cases faster. Quality analysts review all reports before submission to clients and are available 24/7 to help RS's with severity determinations. Finally, all call center supervisors are required to pursue certification as a compliance and ethics professional (CEP).



CASE MANAGEMENT SOFTWARE (MyCM) PRODUCT FEATURES

- Manage all risk, compliance, and employee relation issues within one flexible, configurable solution. The MyCM Web Platform provides easy access to issues reported across reporting channels. Customized account details and user fields allow automated follow up and standardized reporting across your team.
- Clarity through Convergence. MyCM gives managers easily accessible analytics to improve their understanding of compliance issues and exposure facing the business at both operational and strategic levels. Make better, faster business and ethics decisions through superior reporting and analysis.
- Improved efficiency through simple-to-use web interfaces and cross-channel notification. The solution streamlines the identification, assessment, review and treatment processes—including configurable automated case routing and prioritization.
- Integrate seamlessly with virtually all legacy and current HR management systems on the market. If you have a system in place, we lead the market in GRC data integration for cohesive risk mitigation.



HOTLINE INCIDENT REPORTING



Ethico's Hotline, a professional 24/7 anonymous hotline, is a critical component of every robust compliance program.

Because caring compliance leaders are ready to help, nobody should have to suffer due to localized dysfunction or misconduct. A proper third-party awareness solution lets you take action.

THE CHALLENGE

You can't fix what you don't know about. Policies and training only start the job of making sure misbehavior isn't harming your people, quality, reputation, and bottom line. Ethico's secure, thorough, and risk-conscious hotline empowers your entire employee base to contribute to risk awareness and ethical cultures.

THE SOLUTION

With the ability to submit reports of alleged wrongdoing 24/7 from any country in any of over 200 languages with the assurance of anonymity (where needed), a caring and custom configured intake process is essential. The important information your team needs to investigate issues effectively and efficiently can only make an impact if you know about it.

WHAT YOU GET

Our 24/7 hotline answered directly by a live person (instead of hold music/recording) covers all the languages you need with a dedicated toll free number. Expert dynamic interviews go beyond inadequate rote questions to provide key information about events and their related risks. Standardized fields for key information like location and categories, allow you to track, report, and benchmark issues to support your success. All this is supported by Ethico's dedicated Quality Assurance, Account Managers, and service fit for actual people.

CLARITY

Key info sent to the right people. An Adaptive Interview goes beyond scripted questions which leave out key info and force your team to redo the interview. Take action faster with true adaptive intake.

SERVICE EXCELLENCE

Handle risky issues your way. A hotline should support your goals by getting the information you need. Request specific questions and tailored handling instructions to get it right.

AUTHENTIC COMPLIANCE

Never miss a key notification. Treating each issue the same risks losing an issue in the shuffle. 24/7 live, immediate notification and custom severity escalation let you rest assured your team knows what going on.

WEB REPORTING



MyComplianceReport allows customized reporting across desktop, tablet, and mobile devices.

A web reporting option is essential in the internet age. Moreover, built-in compliance standards, adaptive categories and questions, and user friendly design make speaking up easier and issue follow-up faster.

THE CHALLENGE

Not every workplace is set up the same. Some manufacturing plants do not allow phone calls on the floor. Some hospital staff may not be able to keep a phone on them at all times. Ethico's secure, adaptable, and anonymous-capable web reporting portal empowers your entire employee base to contribute to compliance progress 24/7 from mobile, tablet, PC, or any device with a browser.

THE SOLUTION

Build a comprehensive awareness and transparency program with the flexibility and security of a dynamic web portal that accepts document uploads and can be configured to collect the information you need. Empower employees to easily submit the important information your team needs to take action effectively and efficiently to make it right.

WHAT YOU GET

A secure third-party online portal allows people to report misbehavior, policy violations, or other more specific activities you want to know about—all customized with your logo, welcome message, code of conduct, and more. Critically, the dynamic platform is part of an integrated solution so all reported issues, including via our hotline (phone) and MyCM (your office), are aggregated and reported on from within one case management system.

CLARITY

Structured fields for fast follow up. Avoid the partial info from email or other unstructured intake methods and collect key information (location, category) and fields that allow your team to follow up promptly.

SERVICE EXCELLENCE

Interactions and questions your way. Put your reporting parties at ease with clear, customized information about your program, expected follow up, and the values that drive your mission forward.

PEACE OF MIND

One platform for all users. Easily compile reports from the web into your existing workflows with intelligent routing, optional severity escalation, and a range of system integration options so you never cause a problem.

EXIT INTERVIEWS



CLARITY

Interviewers can categorize the interviews by their contents. This ensures reports with compliance violations go to your compliance team, any HR issues and it goes your HR people, or mentioning both and they go to both.

SERVICE EXCELLENCE

Interviews are conducted by trained specialists in intake processes and elicitation. Interview reports are submitted to quality analysts for checks in content, form, and grammar.

PEACE OF MIND

Apart from the standard questions asked during each exit interview, you can add custom question tailored to the needs of your organization or industry.



Improve employee retention, engagement while learning about actionable risks or exceptions during a thoughtful interview with departing employees.

A departing employee is an excellent resource for compliance and HR teams which is so often unused. Without a good exit interview process, your best ideas and key input to improve your culture walk out the door.

THE CHALLENGE

You need to know the unfiltered truth about what is causing turnover, how your workforce is undermining policies, or you need to know what could be done to bring quiet unengaged employees into the fold. Research has shown employees are most honest and candid when leaving a job and the fear of losing their position is no longer silencing them.

THE SOLUTION

Despite having an end date of employment, many departing employees will still resist providing the full unfiltered truth if they are concerned with damage to their relationships or reputation. This is how a third party exit interview strategy comes into play. Exit interviews conducted over the phone with departing employees will ensure everyone has the chance to share hidden information, insights, and recommendations.

WHAT YOU GET

Exit Interviews conducted by third party specialists familiar with intake in HR, E&C, and other potential reportables during exit interview. Interviews can be made by either inbound or outbound phone calls and departees can be incentivized to take part in the interviews with gift card offers. Exit Interview reports are professionally composed and submitted into the integrated MyCM system. MyCM will allow you to access the record of your exit interview reports and set up workflows so the reports are sent to the appropriate generalists or reviewers. Webform exit interview options are also available.

CASE MANAGEMENT SOFTWARE



MyCM is a robust, configurable issue management platform which enables coordination across your team to manage all your issues clearly.

Ethico software and services give E&C and HR teams clarity to know how they can do the most good. Stay on top of what to address and how keep your team safe.

THE CHALLENGE

Regulations, company complexity, and a culture of accountability are growing faster than compliance department budgets. So to properly get the job done, compliance teams need the right tools to drive efficiency and reliability. MyCM improves your ability to process and keep track of the growing work required. With a better handle on the work, you can focus appropriate resources on the issues and areas of highest potential impact.

THE SOLUTION

The MyCM compliance issue management system is highly configurable to fit the existing compliance processes that already work for your team. It handles customization requirements (workflows, notifications, deadlines, team roles) and gives you dashboard, real time and summary reports so you can identify risks and investigate issues to completion efficiently.

WHAT YOU GET

A single platform to record, track, report, and manage all your issues, all your reporting parties, and all your users and reports. MyCM's powerful platform intuitively guides you and your team from initial report and automated assignment to the right coordinator, through investigation, review, and resolution. Pre-loaded reports, extensive custom analytics, and benchmarks keep your eyes on key areas to monitor and improve.

CLARITY

A single repository for all issues. Whether notified via hotline, online, in-office, or email, all your issues are managed in one place so you can view, work, and follow up with clarity.

SERVICE EXCELLENCE

Configured to serve your team. Specialized investigation fields, custom workflows, flexible document upload, and cross platform reminders and messaging. Your team's workflows are easier on MyCM.

AUTHENTIC COMPLIANCE

Built-in best practices. Maximize your ROI with pre-loaded customizable reports combined with focused training and unwavering user support to set up, benchmark and improve your compliance.

DISCLOSURES



CLARITY

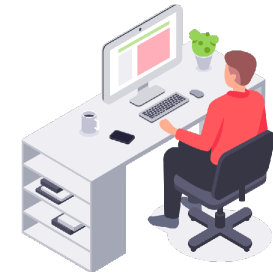
Choose from pre-built templates to launch a consolidated disclosures solution in days instead of months. You can get the data you need without bothersome coding and custom development.

SERVICE EXCELLENCE

Multiple elements of the webform can be configured to meet your specific needs. This could be to include disclaimers, acknowledgements, locations, and more.

AUTHENTIC COMPLIANCE

Smart-routing sends approvals to the people who need to see them, and automatically tracks participation so you can leave your spreadsheets and emails behind.



Our Disclosures reporting tool allows you to effectively manage all requests and approvals in one simple interface, saving you time and money while giving you a better handle of your risk.

Transforming the reporting and approval process for both your HR and Compliance Team, as well as your stakeholders, is easier than you think. Managing your disclosure process from distribution to resolution should and can be easy.

THE CHALLENGE

Conflict of Interest, gift, travel, and entertainment disclosure requirements are notoriously problematic. They are too often an afterthought for employees and thus a draining and ongoing game of chase for managers and HR leaders. Solve both problems with a simple to use, robust disclosures platform offering your workforce an easy way to submit online disclosure forms.

THE SOLUTION

A simplified reporting process increases disclosure reporting rates. The solution therefore, is a streamlined webform allowing stakeholders to easily report disclosures. Direct case management integrations allow compliance and HR teams to have a one-stop platform to review real-time snapshots into their current disclosure risk profile.

WHAT YOU GET

Our Disclosures reporting tool lets you effectively manage all requests and approvals in one simple interface, saving you time and money while giving you a better handle of your risk. Crowdsourcing the process with a tool that allows access from any device for stakeholders to submit, review and reject disclosures. Workflows in the MyCM interface will allow you to automate disclosure routing based on manager to ensure accountability.

+ SANCTION SCREENING LICENSE CHECK



CLARITY

Continually updated exclusion and license primary source data in intuitive reports and dashboards.

AUTHENTIC COMPLIANCE

With our experience over millions of searches, you can rest assured that you've partnered with an expert team.

SERVICE EXCELLENCE

Your dedicated Account Manager and team of experts respond quickly so you never miss something important.



Without an expert partner, you risk wasted staff time, expired licenses, improper exclusion decisions, and eventual fines and government enforcement.

It's your responsibility to make sure you aren't dealing with unlicensed or sanctioned employees, customers, or vendors. That's easier said than done. Our user-friendly platform, expert account managers, and insight from millions of searches reduce your risk and give you confidence that you're safe.

YOU GET ALL THIS

- Adaptive, intelligent search learns your decisions and preferences
- AI-powered continuous database updates mean you're always searching updated lists
- Healthcare focused plan includes access to hundreds of databases including the SSDM file, board actions, and state Medicaid lists.
- Finance and trade focused plan also includes access to hundreds of databases such as BIS, FinCEN, PEP, OFAC, restricted party watchlists, etc.
- Expert guidance and calibrated search and review criteria
- ActionCheck™ guarantees your results up to \$5 million
- NCQA Credentials Verification Organization (CVO)

EXPERT SERVICES

The worst risks are the ones you don't see coming. That's the problem with bare minimum software and improperly scoped review standards. With SanctionCheck & LicenseCheck, your risks are managed by our expert Account Managers and powerful machine-learning software platform. Our knowledge of the complexities of the monitoring process means you lower your risk, save time, and have confidence in the results.

BUILT FOR TEAMS

SanctionCheck and LicenseCheck were built to make coordination, management, and execution across teams a breeze. User groups, segmented reporting, and multiple data upload or integration options put you in control of your standards.

THE FULL **SANCTION CHECK** PROCESS

Web Access

SanctionCheck's robust software compiles sanction databases and watchlists into one platform. This saves time, ensures accuracy, and allows you to upload and check your full lists in one place.

Initial Search

Identify potential matches based on your search criteria. SC experts review against match criteria that fit your risk tolerance.

Additional Data

Sensitive information (such as employee/vendor IDs) not present in the initial search can reduce the size of your list on a second pass.

Agency Follow Up

A valuable effort that's different across agencies. SC's experts know to check for data not available in standard lists.

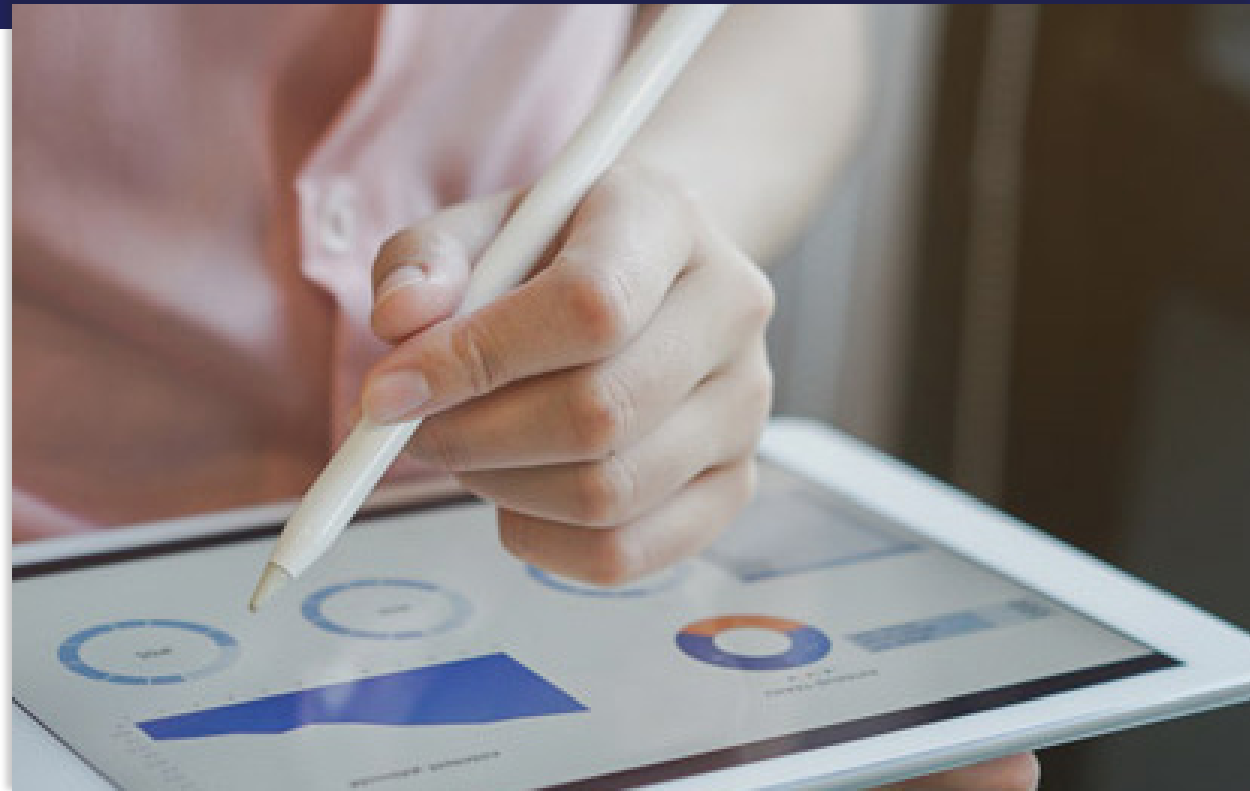
Legal Attestation

When a sanction match cannot be ruled out, SC engages the employee or vendor to attest they are not the listed person or entity on the sanction.

Completely Cleared

Completing each step gives you confidence your reimbursement and reputation aren't put at risk by sanctioned parties.

**IF YOU'RE NOT COMPLETING EACH STEP
IN 'THE FULL PROCESS' THEN YOU'RE
EXPOSED TO AVOIDABLE RISK.**



LICENSECHECK

Ethico's NCQA LicenseCheck keeps your organization safe and compliant through licensure verification and ongoing monitoring. Real-time access to primary source data exceeding standards and requirements allow you to operate with full transparency and confidence. Ensure you are in compliance with standards and regulations. LicenseCheck verifies that a provider's license is active, but also monitors for expiration and status changes (revoked, suspended, restricted, probation). Our goal is to become an extension of your compliance program as we save your staff time and help to protect your patients.

ACTIONCHECK GUARANTEE

With so many names, licenses, boards, lists, and potential matches to consider you can be sure that your screening by SanctionCheck service is complete with our \$5,000,000 guarantee.

+TRAINING LEARNING MANAGEMENT



Your learners don't have to feel like you're wasting their time. Give your people a fresh approach when it comes to compliance training.

Countless scientific studies show the comparative effectiveness of interactive, engaging, relevant, and updated e-learning courses versus old-school text-heavy slides with a voice-over.

THE CHALLENGE

Regulations require training on compliance and ethics for your workforce. You can choose this opportunity to simply check the box or you can choose to use training as a way to supercharge your organization's culture. Sometimes a little education is all someone needs to recognize right from wrong, but this instruction can fall on deaf ears if it is not delivered in a way which your workforce retains.

THE SOLUTION

Ethico's LMS solutions are your answer for interactive training that you don't just watch, you experience. Leverage our robust library of world class content. Or increase relevancy when you overlay your own policies, local culture, and stories for a custom learning experience.

WHAT YOU GET

Access to a library of continuously updated award winning training modules. All generations will enjoy the familiar TV-series format that uses five to eight-minute broadcast-quality episodes or try quick vlog-style micro-learning to strengthen your culture throughout the year. Training courses can integrate with any LMS; however, the Ethico LMS can support your needs just as well with easy to send invitations and reminders. Dashboards allow administrators to monitor completion rates, customize training, and send out micro-learning refreshers. You can even compound your effectiveness by integrating policy and incident examples directly into lessons.

CLARITY

.....
Easily launch, customize, monitor, and reinforce key lessons with memorable courses across any LMS.

SERVICE EXCELLENCE

.....
Our engaging content utilizes modern features such as gamification, micro-learning and experiential video learning.

PEACE OF MIND

.....
Through our partnerships, Ethico can provide you with access to a vast array of materials on many subjects delivered in different tones.

DATA SECURITY SUMMARY



HARDWARE & NETWORK

- **Commercial Data Centers:** (Primary and DR Site): US location, SOC2 Type 2 audited, Video Surveillance and On-site guard 24x7, Multi-factor Authentication (including individually issued badge) required for access.
- **Servers:** Virtualized machines architected for high availability (automatic failover).
- **Operating System:** Our SaaS applications run on current version Windows Server OS. Security patching at least monthly.
- **Monitoring:** Multiple layers of automated, proactive monitoring 24x7.
- **Anti-virus:** Malware and anti-virus protections on all servers. Continuous monitoring and patching/updates at least monthly.
- **Network:** Firewalls protecting all servers and our network. Continuous monitoring and cyber protections are in place.

BACKUPS & DISASTER RECOVERY

- **Disaster Recovery:** Our "Primary Site" systems continually replicate to a second "DR Site." This allows us to have a Recovery Point Objective (RPO) and Recovery Time Objective (RTO) under 1 hour.
- **Backups:** In our "belt and suspenders" approach to data protection we supplement our Disaster Recovery method (described above) with system, file, and database backups.

COMPLIANCE & AUDITING

- We use third party auditors and adhere to these industry best practices
- **SOC2 Type2:** Audited annually.
- **CVO/NCQA:** Audit bi-annually.
- **Penetration Testing and OWASP:** Tested annually.
- **Vulnerability Testing:** Tested quarterly.
- **HIPAA:** All our systems are designed to adhere to HIPAA requirements for privacy.
- **GDPR:** We provide extra protections for Clients who need us to adhere to GDPR standards.

SOFTWARE

- **Language:** Our custom, proprietary SaaS solutions are based on current .Net framework
- **Testing/Quality Assurance:** Our software development lifecycle (SDLC) uses multiple phases of testing (unit testing/Dev, QA, and UAT). The QA Testing is performed by an independent testing team using hundreds of testing scripts that include security testing and regression testing. Before a release to production all code is reviewed by the Information Security Team during the development/testing process. All software goes through a thorough security review at the time of release and is tested annually against the OWASP Top Ten and other common threats for vulnerabilities.
- **Updates:** Software releases for small system improvements or addressing bug defects occur at least monthly. Major updates or new function releases occur at least quarterly.

DATABASE & DATA PROTECTION

- **Database:** Microsoft SQL Server is our standard database management system. All client data is housed within the application database and accessed by our SaaS solutions.
- **Client Segregation:** All Client data for a particular database – LOGICALLY segregated by Client ID. Client data is not visible to another Client.
- **Encryption ("data at rest"):** Our SQL Server databases are fully encrypted, as well as backups of the database, using AES 256 strong encryption.
- **Data Masking:** In addition to database encryption, sensitive data such as passwords and PII are masked when displayed on a screen by the application.

FILE & DATA TRANSMISSION

- **"Data in Transit":** All web pages of the application are encrypted by HTTPS and TLS so that information moving from the SaaS application to your browser (data in transit) is secure.
- **API:** Our SaaS applications use a RESTful API for 3rd party system integration. Our APIs utilize OAuth authentication, secured by a 256-bit SSL cert that is all software-based protection.
- **Secure FTP (myCM):** Some clients in myCM use a third-party relationship for compliance management. Client-vendors receive myCM case information through a secure, encrypted "SFTP" folder that is unique to them.
- **Secure FTP (SanctionCheck & LicenseCheck):** Communication of lists and exclusions are submitted via secure and encrypted methods.
- **XML (myCM):** Microsoft SQL Server is our standard database management system. All client data is housed within the application database and accessed by our SaaS solutions.

INTERNATIONAL DATA PRIVACY FAQ

Your key questions about international data protection

Q How does Ethico identify GDPR data for the hotline?

A Ethico has dual verification system for reports that may contain GDPR information. During the setup process, any client who has locations in the EU or related states will automatically be assigned a category named, "GDPR". Any report that comes in from an EU or related state will be assigned the "GDPR" category. Also, as part of the review process by our QA Team, the reviewer will mark the "GDPR" check-box identifying these calls as GDPR. Two data points allow Ethico to be able to identify reports related to GDPR at any time. We are able to provide clients and their reports information in a timely fashion due to this. If a reporter contacts Ethico directly, we will notify the client of any data requested within one business day. Ethico will wait for up to one-business day for the client to respond to any data requests. If the client has not responded at that time, Ethico will act according to GDPR guidance.

Q How long does Ethico hold onto hotline data for countries with data privacy laws?

A Ethico has determined that all call records pertaining to countries with international data privacy laws will be retained for 6 months. After 6 months, all report data will be purged from the system. A shell of the report will remain with a note that this report has been removed according data privacy guidelines.

Q How does Ethico identify GDPR and international data for SanctionCheck?

A In order to identify records in SC that are GDPR related, we provide clients with a field that they fill out when uploading their files to the system. All searches done against these names will be flagged as "GDPR." This flag is how we identify any information that is provided in accordance with GDPR data privacy laws. If a data requester requests for change or deletion, we will respond to the client who performed the search within one-business day. Ethico will wait up to one business day for a response from the client for instruction on how to proceed with the request. If the client does not respond in this period, Ethico will fulfill the request based on GDPR data privacy guidance.



Q How long does Ethico hold onto GDPR data for SanctionCheck?

A Since SC is a system of audit for checking employees, vendors, physicians, board members, and volunteers against sanction databases, we will save any records and search results for 2 years for any entity tagged as "GDPR." After the 2-year time period all search information, will be completely purged from our system leaving only a shell of the search with a note that this person "has been removed" in accordance with GDPR guidelines.

Q Does Ethico have a Data Processing Agreement in place with Clients within the European Union (EU) and vendors, who have potential access to Client Data?

A Yes, Ethico has data processing agreements in place, which include the standard contractual clauses (EU 2010/87)

Q How does Ethico keep up with the ever changing data privacy laws?

A We are constantly reviewing the security frameworks to ensure any international data transfer meets all necessary security regulations. We monitor data security regulations in countries around the world to make sure we are current with data privacy laws. We have a system that tells us of the privacy changes, requirements, how it relates to our processes, and recommendations on changes we need to make.

Q Does Ethico comply with international data privacy laws and which ones?

A Ethico is compliant with data privacy standards around the world. These include but are not limited to: GDPR, LGPD, PIPEDA, Singapore PDPA, EU Whistleblower Directive, SOX, HIPAA, CCPA, UK FCA, Australian Privacy Act, etc.



Together, we will make the world a better workplace.

Our values and brand promise are what guide us along this path. While every company has a set of 'Core Values' hanging on their wall, what separates us from others is our ongoing commitment to take these values off the wall and authentically live them out each day.

The Ethico Promise

