

Father Flanagan's Boys' Home (a/k/a Boys Town) and its affiliate corporations (hereinafter collectively referred to as "Boys Town") provide employees, volunteers, and interns an effective way to report what they believe to be inappropriate, illegal, or unethical behavior or activities, such as theft, embezzlement, harassment or unlawful discrimination, acts or threats of physical violence, misappropriation of assets, and other activities directly related to management. EthicsPoint is an independent third party that receives the reports of violations of policies and/or public law and directs them to the appropriate member of management. Boys Town allows reporters to use this process without fear of retaliation or reprisal.

As a general principle, and wherever it is possible to do so, reporters should attempt to report an issue at the lowest level. This may involve an employee discussing the matter directly with the individual involved in the situation or with the employee's immediate supervisor. If the matter cannot be resolved at that level, or if the matter directly concerns the employee's immediate supervisor, the employee should discuss the matter with the next-level supervisor, a Vice President/Affiliate Executive Director, a member of the appropriate Human Resources Department, or the Office of the General Counsel.

EthicsPoint provides a method for anonymous reporting. However, the reporter may be asked additional questions or be asked to reveal his or her identity so that a report made through EthicsPoint can be fully investigated. Statements made and information disclosed during the processing of an EthicsPoint report will be shared as required by law, and/or as permitted by law, at Boys Town's discretion.

Submitting an EthicsPoint Report

- Reporters may submit an issue to EthicsPoint by typing in the website address established for Boys Town at www.boystownethics.com or by calling the EthicsPoint toll-free number at 1-888-264-0754.
- Telephone calls are answered by EthicsPoint's independent call center, which assists in completing the report.
- Once an EthicsPoint report has been made, the individual is assigned a unique code called a "report key." The reporter should write down the report key and password and keep them in a safe place. After 7 to 10 business days, the reporter should use the report key and password to check the report for feedback and/or questions.

Employees should not report the following to EthicsPoint:

- Safety or rights violations involving any youth. These should be reported to the Youth Safety Line (as noted in FFBH Policy #2675, Youth Safety Line) instead of EthicsPoint.
- Do not use EthicsPoint to report events that present an immediate threat to life and/or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact 911 or the appropriate authorities.

For additional information, please refer to Policy #4400, Employee Grievance, and its related procedures and practices.