

## **EthicsPoint FAQ**

### **Q. What is EthicsPoint?**

EthicsPoint is Kamehameha Schools' confidential compliance helpline/hotline. It is a comprehensive and confidential reporting tool which employees can utilize to report unethical, illegal, or prohibited behaviors and activities within or pertaining to Kamehameha Schools. Employees can also utilize the EthicsPoint system to ask questions or seek guidance pertaining to compliance and ethics related issues and concerns.

### **Q. May I report using either the KS Intranet or the telephone?**

Yes. You can access the Helpline either electronically through a KS intranet link to EthicsPoint or by telephone to EthicsPoint's call center (toll free number: 1-866-294-9573), both of which are available 24 hours a day, 365 days a year. By giving you choices, EthicsPoint helps to ensure that you can file a report in the manner most comfortable or convenient for you.

### **Q. Why do we need a system like EthicsPoint?**

- KS' employees are the key to fostering an organizational culture that values ethical behavior and respect for compliance with laws, regulations, and internal policies. Through open channels of communication, you can participate in improving our organizational culture.
- The EthicsPoint system is an additional resource that provides a safe and secure method for employees to raise questions and share their concerns. Despite KS' strong commitment to confidentiality and anti-retaliation, employees who witness or experience unethical practices can understandably be reluctant to report their concerns while at work due to fear of reprisal, retaliation, or other adverse consequences. A confidential third-party reporting hotline such as EthicsPoint can help eliminate these concerns by providing employees the opportunity to submit a report anonymously, confidentially, and from a secure and private location outside of the workplace.
- Helplines have proven to be an effective means for reducing compliance violations and protecting an organization's assets and reputation.
- The implementation of a third-party helpline demonstrates and reinforces KS' commitment to ethical behavior.

### **Q. Does KS management really want me to report compliance violations?**

We certainly do. In fact, we need you to report. You know what is going on within KS - 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 KS and its stakeholders. Additionally, your input may help identify issues that can improve our organizational mission, culture, and performance.

**Q. Why should I report what I know? What's in it for me?**

As stewards of Pauahi's generous gift to her people, we are responsible for acting in an ethical manner and letting KS management know if someone is not acting appropriately. By working together, we can maintain a safe and nurturing environment that supports our culture and values.

**Q. What type of situations should I report?**

You should report any violation of applicable laws, regulations, KS policies & procedures, the KS Code of Conduct, or any other unethical behaviors or activities.

**Q. If I see a violation, shouldn't I just report it to my manager or human resources representative and let them deal with it?**

You certainly can and are encouraged to do so. However, if such contact is not possible or convenient or if you wish to remain anonymous, you may use the KS Compliance Helpline. All reports submitted through EthicsPoint to KS will be handled promptly and confidentially.

**Q. It is my understanding that any report I send from my computer at work generates a server log that shows every web-site that I connect with. 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.

**Q. Can I file a report from home and still remain anonymous?**

Yes. When contacting the call center, you will be given the option to identify yourself, request confidentiality, or remain anonymous. EthicsPoint is contractually committed not to pursue a reporter's identity.

**Q. 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, you as a reporting party need to ensure that the content of your report does not reveal your identity by accident. For example, "From my cube next to John Smith..." or "In my 33 years with KS..."

**Q. Isn't this just a "Big Brother" program making everyone suspicious of everyone else?**

Absolutely not, the EthicsPoint system concentrates on being a positive aspect of the overall KS organizational culture, and allows employees to partner with management to assure a safe, secure, and ethical workplace. We encourage you to use the system to seek guidance on ethical

dilemmas, provide positive suggestions, or communicate a concern. Effective communication is the lifeblood of any organization and EthicsPoint is a great way to enhance that communication.

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

Compliance violations may negatively impact KS's tax-exempt status, result in penalties imposed on KS by regulatory agencies, expose KS to civil liability, and damage KS' reputation. Accordingly, all staff members have a responsibility to protect the trust, the school, its students and its mission. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your co-workers to report it.

**Q. I am not sure that what I've observed or heard is a violation of KS policy, or involves unethical conduct, but it just does not look right to me. What should I do?**

Use the KS Compliance Helpline to file a report. EthicsPoint can help you to prepare and file your report so it can be properly understood. We'd rather you report a situation that turned out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

**Q. 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 KS who are responsible for processing alleged violations. Each of these recipients has had training in keeping these reports in the utmost confidence. Moreover, the EthicsPoint's system and staff ensure that no report is ever shared with implicated parties.

**Q. 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 are designed so that no report is ever shared with implicated parties. This will help to eliminate cover-ups by any implicated individual.

**Q. What if I remember something important about the incident after I filed the report? Or what if KS management has further questions for me concerning my report?**

When you file an electronic or telephone report, you receive a unique user name and are asked to choose a password if you wish to remain anonymous. You can return to the EthicsPoint system again either electronically or by telephone and access the original report to answer questions posed by KS management and add further information that will help resolve open issues. We strongly suggest that you follow up within five days of filing your report. This will enable you and KS management to have an "anonymous dialogue" where situations are not only identified but also resolved, no matter how complex.

**Q. Are these follow-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.

**Q. What if I want to be identified with my report?**

There is a section in the report for identifying yourself, if you wish.

**Q. Can I still file a report if I don't have access to the KS intranet?**

If you don't have KS intranet access or are uncomfortable using a computer, you can call EthicsPoint toll-free at 1-866-294-9573. The call center is available 24 hours a day, 365 days a year.

**Q. Is the telephone toll-free helpline confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an electronic report and an interviewer will type your responses into the EthicsPoint system. These reports have the same security and confidentiality measures applied to them during delivery.

**Q. What happens after I file an EthicsPoint complaint?**

A cross-functional team first meets to decide how the complaint should be investigated. An investigation is conducted and the manager and one-up manager of the implicated employee(s), the Managing Director of Human Resources, and the Director of Compliance decide whether there was a compliance violation and, if so, make a decision about the appropriate level of discipline, which may include warning, suspension, or termination.