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### **About EthicsPoint**

#### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees of organizations such as Pearson College to work together in identifying and addressing fraud, abuse, and other misconduct in the workplace, while cultivating a positive work environment.

#### Why do we need a system like EthicsPoint?

- Pearson College believes our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and a strong, supportive workplace.
- Pearson College has effective internal policies and procedures in place to help foster a culture of integrity and ethical decision-making. Ensuring access to an independent reporting body such as EthicsPoint complements our approach.

# **Reporting – General**

#### May I report online or by telephone?

Yes. EthicsPoint is accessible either online or by phone. Both routes give you the ability to file a confidential, anonymous report.

#### What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our stated Code of Conduct, or other concerns you may have.

# If I see a violation, shouldn't I just report it to my manager, security, or human resources department and let them deal with it?

When you observe behaviour you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting an issue in this manner. It is for those such circumstances that we have partnered with EthicsPoint. We would rather you report a concern anonymously than keep the information to yourself.

#### Why should I report what I know? What's in it for me?

An open, supportive and transparent workplace benefits all staff, and all members of our community. Everyone has the right to work in a positive environment, and that right is supported by exercising certain responsibilities, such as the obligation to act in an ethical manner and to express concern about situations in which someone may not be acting appropriately.

#### Does management really want me to report?

Yes. In fact, we *need* you to report. You may have initial knowledge of an activity that could be cause for concern. Your reporting can <u>minimize</u> the potential negative impact on our institution, students, faculty and staff. Also, offering positive input may help identify issues that can improve overall organizational, culture and performance.

#### Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent a possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company 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 maintaining the confidentiality of these reports.

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

No. EthicsPoint is a service that provides a complementary, third-party reporting option that supports our already-strong policies and procedures to maintain our safe, secure, and ethics-based workplace. Whether directly to management or through EthicsPoint, staff are encouraged to seek guidance on ethical dilemmas, provide positive suggestions or communicate concerns.

# **Reporting Security & Confidentiality**

I understand any report I send from a company computer generates a server log that shows every website I view. Won't this log identify me as a report originator?

EthicsPoint <u>does not generate or maintain</u> any internal connection logs with IP addresses, so no information linking your company or home computer to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue the identity of anyone who makes a report.

If you feel uncomfortable making a report on your work computer, you have the option of using any computer to submit a report via EthicsPoint's secure website. Many people choose this option, as EthicsPoint's accumulated data shows that fewer than 12% of reports are generated during business hours.

#### Can I file a report from home and still remain anonymous?

A report from 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, whether through a work, home, or even neighbour's computer. Plus, 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 inadvertently reveal your identity by using identifying phrases, for example, such as, "From my workstation next to Jan Smith..." or "In my 33 years with...".

#### 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 online report and an interviewer will type your responses into the EthicsPoint website form. 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 an optional 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?

We choose to promote ethical behavior at Pearson College. All unethical conduct, at any level, ultimately hurts the credibility of our institution and reflects negatively on all staff, faculty and students. By making the decision to report, you help the College and community maintain its ethical goals.

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. 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 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 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 my organization has further questions concerning my report?

When you file a report through the EthicsPoint website or toll-free telephone number, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either online or by telephone and access the original report to add more detail, respond to any questions for clarification posed by a company representative, and add further information to help resolve open issues. We strongly suggest that you return to the site in the time specified to answer follow-up questions. You and the company 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 correspondence is 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?

Yes. You can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year. If you prefer to file online, and you don't have your own computer or smartphone, many public locations, including the public library, have computers with Internet access.