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About the Ethics Response Hotline

What is the Ethics Response Hotline?

The Ethics Response Hotline is a comprehensive and confidential reporting tool created by NAVEX that enables management and employees to work together to address fraud, abuse, and other misconduct in the workplace while cultivating a positive work environment.

Why do we need a system like the Ethics Response Hotline?

- Our employees are our most important asset. By creating open channels of communication, we promote a positive work environment and maximize productivity.
- An effective reporting system augments 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. The Ethics Response Hotline enables you to file a confidential, anonymous report via either the telephone or the Internet.

What types of situations should I report?

The Ethics Response Hotline system allows employees to report any violation of our stated Code of Conduct, or other concern you may have.

What violations should I report?

A comprehensive list of issues that can be addressed via the Ethics Response Hotline can be reviewed [here](#).

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

When you observe some behavior that 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 the issue in this manner. It is for such circumstances that we have partnered with NAVEX. 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?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. And, corporate misconduct can threaten the very existence of an entire company.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our company - 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 the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

What happens when an issue is reported?

The Ethics Response Hotline allows the Food Bank to provide support for individuals looking to better understand their reporting options, serves as a resource and measure of accountability to formal reporting channels, and advocates for individuals who may not be comfortable pursuing formal reporting channels. Additionally, the hotline serves as a means of data gathering and assessment on patterns and trends to mitigate the pervasive effects and recurrence of violations.

In instances where the reporter self-identifies, and consents to participate in next steps, a member of the HR Team will reach out to connect and provide a space to talk through the reported incident in more detail. They will then provide you with resources and options on the next steps to help address the incident, or directly address the incident, depending on the nature and severity of the concern.

Although not every incident will be a violation of organizational policy or law, all reported incidents will be reviewed for an appropriate response. Depending on the nature and severity of the behavior, the concern may be addressed through education, restorative practices, mediation, community dialogue, or referral to appropriate offices for review, investigation, resolution.

Where do these reports go? Who can access them?

Reports are entered directly on the Ethics Response Hotline secure server. NAVEX 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 keeping these reports in the utmost confidence.

Designated administrators provided with details of a reported violation will treat the information as only to be shared on a need-to-know basis. Even when the details must be shared, respect and privacy of all involved parties will be exercised.

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

No. The Ethics Response Hotline is a positive aspect of our overall philosophy that allows us to ensure a safe, secure and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace 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 a company computer generates a server log that shows every website that my PC connects with. Won't this log identify me as the report originator?

NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to Ethics Response Hotline is available.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café or at a friend's house) through the Ethics Response Hotline secure website. Many people choose this option, as NAVEX data shows that fewer than 12% of reports are generated during business hours.

Can I report an issue anonymously?

You may report anonymously through the Ethics Response Hotline. While this may limit the Food Bank's opportunity to respond and directly address your concern, it will allow us to gather information toward remedial action.

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 Ethics Response Hotline system strips away Internet addresses so that anonymity is totally maintained.

I am concerned that the information I provide Ethics Response Hotline will ultimately reveal my identity. How can you assure me that will not happen?

The Ethics Response Hotline system protects 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. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

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 Ethics Response Hotline 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 to identify yourself, if you wish.

Tips & Best Practices

I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?

Our company promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy company. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

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. NAVEX 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.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The Ethics Response Hotline system and report distribution ensure 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 company has further questions for me concerning my report?

When you file a report at the Ethics Response Hotline Web site or through the Ethics Response Hotline Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the Ethics Response Hotline system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer company 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 Ethics Response Hotline correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

Can I still file a report if I don't have access to the Internet?

You can file an Ethics Response Hotline 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 Ethics Response Hotline toll-free hotline, which is available 24 hours a day, 365 days a year.