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About EthicsPoint

What is EthicsPoint?

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

Why do we need a system like EthicsPoint?

- Our employees are our most valuable asset. By creating open channels of communication, we promote a positive work environment and maximize productivity.
- An effective reporting system enhances our efforts to foster a culture of integrity and ethical decision-making, where employees are encouraged to speak up and ask questions or report wrongdoing.

Reporting – General

Can I report using either the internet or the telephone?

Yes. EthicsPoint enables you to file a confidential, anonymous report via either the telephone or the Internet.

What types of situations should I report?

The EthicsPoint system allows employees to report any violation of our Standards of Business Conduct, policies, procedures, or the law.

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 behavior that you believe violates our Standards of Business Conduct, policies, procedures, or the law, we expect you to report it. You are encouraged to bring any concerns forward to your direct manager or another manager you trust. We recognize there may be situations where you are not comfortable reporting your concern to a manager. This is why we have partnered with NAVEX to provide additional resources for you to ask questions or raise concerns.

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

Reporting wrongdoing is not always easy, but it is the right thing to do. When you speak up and report misconduct or suspected misconduct, it allows our company to evaluate and promptly address issues. 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.

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.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint 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.

Reporting Security & Confidentiality

Am I really anonymous?

Whether you report a concern from work, home, a neighbor's computer, or any internet portal you can remain anonymous if you choose to. NAVEX does not generate or maintain connection logs, so no information linking your connection to EthicsPoint is available. The EthicsPoint system also strips away internet addresses to maintain anonymity.

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

Many times, anonymous concerns can be much more difficult to investigate; however, if you wish to remain anonymous, the EthicsPoint system protects your anonymity. When asking a question, or reporting a concern, avoid using any identifying information. For example, "From my cube next to Jan Smith..." or "z My manager John Smith...".

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 EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

Tips & Best Practices

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?

Bring the concern forward. Immediately raise your concerns with your manager, Business Conduct Advisor (BCA), human resources, Ethics, or the law department. NAVEX can also 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 EthicsPoint 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 EthicsPoint website or through the EthicsPoint Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the EthicsPoint system again by internet or telephone and access the original report to add more detail or answer questions posed by a company representative.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report.

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.

For further assistance you may also contact the Sector Ethics office by sending an email to one of the email addresses below:

Aeronautics Systems - As_ethics_office@ngc.com

Corporate - CorpEthicsOffice@ngc.com

Defense Systems - DSEthics@ngc.com

Mission Systems - EthicsOfficeMS@ngc.com

Space Systems - SPEthics@ngc.com