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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool to assist management and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like the EthicsPoint Ethics and Compliance Hotline?

We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.



Reporting – General

May I report using either the Internet or the telephone?

Yes. With the EthicsPoint Ethics and Compliance Hotline, you have the ability to file a confidential, anonymous report via either the telephone toll-free at 1-888-854-5145 or the Internet. Both are available 24 hours a day, 365 days a year.

What type of situations should I report?

The EthicsPoint Ethics and Compliance Hotline is designed for employees to report any violation of our stated Code of Business Conduct and Ethics, or other concern you may have.

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

When you observe some behavior that you believe violates our Code of Business Conduct and Ethics, we expect you to report it. Ideally, you should bring any concerns forward to your direct Supervisor, Manager, a representative of either the Human Resources Department or the Legal Department, an Officer, or other member of our Executive Team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. In such circumstances, we encourage you to utilize the EthicsPoint Ethics and Compliance Hotline. We would rather you report anonymously than keep the information to yourself.

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. 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 to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within our company who are charged with evaluating the report and with maintaining the reports in the utmost confidence.



Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and 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. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment or contacting the EthicsPoint Ethics and Compliance Hotline via telephone, toll-free at 1-888-854-5145.

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 EthicsPoint Ethics and Compliance Hotline system strips away Internet addresses so that anonymity is totally maintained. 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 Ethics and Compliance Hotline 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 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 EthicsPoint Ethics and Compliance 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 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?

Our company chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your co-workers 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. The EthicsPoint Ethics and Compliance Hotline 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 Ethics and Compliance Hotline 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 the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Ethics and Compliance Hotline, either through the Web site or through the Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint Ethics and Compliance Hotline again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. 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 be resolved, no matter how complex.

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, continuing under the umbrella of anonymity.