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About EthicsPoint

What is EthicsPoint?

EthicsPoint is an independent, secure and confidential reporting system to assist management and employees to communicate any concerns about potential wrongdoing or misconduct or unethical behavior in the workplace to the appropriate people in the company who can address the concerns.

Why do we need a system like EthicsPoint?

- We believe that our employees are our most important asset. By creating open channels of communication, such as EthicsPoint, we can promote an ethical culture, positive work environment as well as maximize productivity.
- Publicly traded companies are required by law to have an anonymous reporting system like EthicsPoint to communicate to management any concerns employees may have about potential wrongdoing, misconduct or unethical behavior.
- An independent and secure reporting system such as EthicsPoint will augment all our efforts to foster a culture of integrity and ethical decision-making within our company.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential report via either the telephone or the Internet.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any concerns about potential wrongdoing or misconduct or unethical behavior.

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

Yes, you should. When you observe behavior that you believe violates a company policy or is evidence of potential wrongdoing, misconduct or unethical behavior, 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 may not feel comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint to enable you to have another means to make such reports, including the means to make such a report anonymously.

Why should I report what I know?

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 in the company know if someone is not acting appropriately. By working together, and acting ethically, we can maintain a healthy and productive work environment, and we also will maintain the reputation of our company.

Does management really want me to report concerns?

We certainly do. In fact, we *need* you to report any behavior that appears to you to be inappropriate or unethical. You may have knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and on our reputation.

Where do these reports go? Who can access them?

Reports are entered directly onto the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged by company policy with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients is required to keep these 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 computer 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 computer to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to report a user's identity to the company.

If you feel uncomfortable making a report on your work computer, you have the option of using any computer outside the company to access the EthicsPoint secure website.

Is the telephone toll-free Ethics Guideline 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 reporting system and forward the reports to the appropriate people in the company to handle your concerns. These reports have the same security and confidentiality measures applied to them as any other report made to EthicsPoint.

What if I want to be identified with my report?

There is a section in the report for identifying yourself. We encourage you to do this so we can follow-up with you directly with any questions. If you identify yourself the matter may be resolved more quickly. The company has a policy against retaliation if you make your reports know truthfully and in good faith.

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 wants to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. So if you know of any incidents of wrongdoing, misconduct or unethical behavior, it is your duty 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?

You should always make a report if something does not look right to you. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unnoticed because you weren't sure.

What if my boss or other managers are involved in a violation?

The EthicsPoint system is independent and secure and reports made to EthicsPoint are not distributed to implicated parties, and 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 Web site or through the EthicsPoint Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system 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 from time to time to answer company questions.

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, and if you choose to make the report anonymously, the report will continue to be kept under the umbrella of anonymity.