

# About EthicsPoint

## Questions & Answers for Employees



NATIONAL  
UNIVERSITY  
SYSTEM

### 1. What is EthicsPoint?

EthicsPoint is an independent, third-party confidential reporting tool that assists employees to report and address unethical, financial, non-compliance, policy, misconduct, and other institutional issues, all while cultivating a positive work environment. EthicsPoint is an effective system intended for employees to report concerns anonymously when they do not feel comfortable doing so in person or directly to someone in the organization.

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

We believe that our employees are our most important asset. By creating open channels of communication, we can promote an ethical, compliant, and safe work environment. The University considers anonymous reporting tools like EthicsPoint as a key tool and best practice to address compliance, potential unethical or unlawful and other misconduct issues/behaviors. An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

### 3. May I report using either the Internet or the Telephone?

Yes. With EthicsPoint, you can file a confidential, anonymous report via either the telephone or the Internet, in the manner most comfortable or convenient for you.

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

The EthicsPoint system is designed for employees to report unethical and improper behavior promptly. If you have information about behavior believed to be in violation of the law, policies, compliance, or ethical standards, you are encouraged to express concerns directly with your supervisor(s), department manager, Human Resources, or any other appropriate University office or official. EthicsPoint does not replace or supersede existing reporting methods. General reporting types are as follows:

<b>Conflicts of Interest</b>	Inappropriate third-party relations, misuse of proprietary information or intellectual property, improper relations
<b>Computer &amp; Information Security/Privacy Violations</b>	Copyright issues, data privacy/integrity, inappropriate use of technology, software piracy/intellectual property infringement.
<b>Discrimination, Harassment, or Retaliation</b>	Bias incidents, discrimination, harassment, nepotism, threats, benefit abuses, retaliation
<b>Financial Matters</b>	Embezzlement, fraud, improper giving/receiving, improper disclosures, theft, falsification of records; waste, abuse or misuse of institutional resources
<b>Non-immediate physical safety matters</b>	Sabotage or vandalism, public safety, unsafe working conditions.
<b>Occupational/Environmental Safety and Health Matters</b>	Environmental issues, neglect, unsafe working conditions, other risk/safety matters
<b>Research or Academic Misconduct</b>	Fraud, abuse, misappropriation, research non-compliance, intellectual property infringement, scientific misconduct
<b>Regulatory Compliance Issues</b>	Misrepresentation, inaccurate/incomplete disclosures, improper documentation/guidance, unlawful practices, falsification of records.

### 5. If I see a violation, shouldn't I just report it to my supervisor or Human Resources, and let them deal with it?

When you observe behavior that you believe violates our code of conduct, we expect you to report it timely. University and System employees are still encouraged to express any concerns to their supervisors, department manager, Human Resources, or any other appropriate University office or official.

However, we recognize that there may be circumstances when you are not comfortable reporting the issue in this manner. In these instances, employees can utilize this EthicsPoint reporting tool to report issues anonymously.

**6. Does management really want me to report?**

We certainly do. In fact, we *need* you to report. You many have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the University and System Community. Also, your input may help identity issues that are important and need to be addressed by the System/University. Reporting concerns is a service to the System/University, and will not jeopardize your employment. We expect that reports will be made in good faith to address legitimate issues or concerns.

**7. Why should I report what I know?**

We all have the right to work in an ethical work environment; and with that right comes the responsibility to act in a principled manner. This responsibility includes letting the University or System know if someone is acting inappropriately. By working together, we can maintain a healthy, safe, and compliant environment.

**8. 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. All reports submitted through EthicsPoint will be given careful attention by the appropriate University and/or System Administrators. Submissions to the EthicsPoint Hotline will be routed to and evaluated by the appropriate Compliance and Legal staff. EthicsPoint ensures that any named party in a complaint will not have access to that information.

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

No. The EthicsPoint system provides a third-party confidential resource that allows the University and System to promote an ethical, compliant, and safe workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, and/or communicate concerns. Effective communication is critical in today's workplace and EthicsPoint provides a great tool to enhance that communication.

**10. Can I file a report and still remain anonymous?**

All reports will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system removes internet addresses so that anonymity is totally maintained. Additionally, the University and EthicsPoint are contractually committed not to pursue a reporter's identity.

**11. 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, 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..."

**12. It is my understanding that any report I send from a company computer generates a server log that shows every website 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 pursue a reporter's identity.

If you feel uncomfortable make a report on your work computer, you have the option of using a computer outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website.



**13. 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 a professionally trained interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

**14. What if I want to be identified with my report?**

There is a section in the report for identifying yourself if you wish to do so.

**15. I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?**

The System and affiliate universities are committed to conducting its operations and responsibilities in an ethical manner and in accordance with all applicable laws, regulations, and policies. The University not only expects but depends on you to share in this responsibility through the reporting of concerns which involve possible noncompliance with policy and/or unethical behavior. All unethical conduct, at any level, ultimately hurts the University and all employees, including you. So, if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your colleagues to report it.

**16. 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?**

Consider talking with your supervisor and/or the appropriate departmental areas to see if the situation should and can be addressed. However, if you are uncomfortable using existing reporting methods, you are encouraged to file a report. 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.

**17. 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.

**18. 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 Report Key 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 provide additional information or to answer questions posed by University representative. We strongly suggest that you return to the site in the time specified to check the status of your report.

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

Follow-up reports the same security and confidentiality measures applied to them as the original report.

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

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have computers with internet access. If you don't have access or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline (855) 582-3769 which is available 24 hours a day, 365 days a year.