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About EthicsPoint & the AUI Ethics & Integrity Line

What is EthicsPoint?

- EthicsPoint is a comprehensive and confidential reporting tool, provided by NAVEX Global, an independent third party vendor, to assist AUI management and AUI employees – both at the Corporate Office and at the Research centers - to work together to address any cases that arise relating to fraud, abuse or other misconduct in the workplace, while maintaining a positive and trusting work environment. Their tool, when used by AUI, is known as the AUI Ethics & Integrity Line.
- AUI chose NAVEX Global for its seriousness and security standards. NAVEX Global provides more employee hotlines than any other vendor, for more than 8,000 customers across more than 200 countries. All the anonymous reports that they receive on behalf of their clients are captured in a central repository to support each client's investigation, remediation, reporting and trend analysis. They are a recognized leader in risk data collection, investigation and analysis systems.

Why do we need the AUI Ethics & Integrity Line?

- This channel is being introduced to support anyone who in good faith alleges misconduct, dishonest, unethical or illegal activity occurring at the AUI Corporate Office or at AUI research centers. Such misconduct could refer to violations of laws, rules, regulations, our internal policies and procedures and/or a threat to the public interest (e.g. fraud, health and safety matters, corruption).
- The introduction of this system has not been preceded by any known illegal acts or gross non-compliance at AUI or its Research centers. Neither does its introduction signify any lack of confidence by AUI in its employees or any presumption that some wrongdoing is taking place.
- On the contrary, our employees' credibility, honesty and accountability are a source of great pride to AUI. We have positive reasons for implementing the Ethics Line.
- By ensuring, though, that AUI employees always have open channels of communication, we promote a positive work environment and maximize productivity.
- The effective reporting system that the AUI Ethics & Integrity Line represents augments our other efforts to ensure a culture of integrity and ethical decision-making. This system further promotes our values of equity, care, encouragement, trust, respect, reciprocity and is another example whereby we encourage AUI employees to speak up with the confidence that they will be listened to, if they have any concerns.

Is this just a telephone line to make complaints?

- No. EthicsPoint establishes a sophisticated, yet simple and secure way for the AUI President to receive and process AUI or research center-related complaints via channels that allow for complete anonymity and productive, prompt follow-up.

Does this replace the existing mechanisms for AUI employees to raise concerns?

- No. It *complements* the policies, procedures and practices which already give AUI employees the opportunity to raise their concerns (e.g. the employee consultation policy; the policy promoting a respectful and non-discriminatory workplace; the safety policy; the grievance procedure policy; the Ombuds program and others).
- Employees are very much encouraged to use the above-mentioned channels of communication to voice their concerns. However, should any person feel that none of the above would be an appropriate method to raise an issue or resolve their concern (or, to put it another way, that s/he considers the above-mentioned channels inappropriate in any way, or for any reason), s/he is encouraged to contact AUI's Ethics Line, via that service's web portal or telephone.

Reporting – General

May I report using either the Internet or the telephone?

- Yes. The AUI Ethics & Integrity Line gives you the ability to file a confidential, anonymous report via either the telephone or the Internet.

How does the web-based reporting work?

- Data is encrypted with 128-bit SSL encryption technology (i.e. no cookie storage or tracking)
- The AUI Ethics & Integrity Line is globally accessible 24/7/365, managed via a US Call Center. In addition, it is/has bi-lingual, easy-to-use web forms and an option to upload documents.
- Employees may also add more case information anonymously after their initial report.
- Notifications of case assignments and reminders are generated via e-mail, referring case participants to the web application

What type of situations should I report?

The AUI Ethics & Integrity Line is designed to report any violation of laws, regulations, AUI or research center policies, or other concerns you may have, concerning:

- Financial Reporting or Accounting Irregularities, including the circumvention of internal controls.
- Regulatory Non-compliance
- Embezzlement, Fraud or Theft
- Conflict of Interest
- Unethical Ethics in the Conduct of Research
- Gross Mismanagement or the Gross Waste of Funds
- Workplace Violence, Threats, Intimidation or Harassment
- Discrimination & Discriminatory Harassment
- Safety, Health & Environmental Issues
- Substance and Alcohol Abuse in the Workplace
- Abuses of Authority
- Information Technology or Physical Security Issues, Threats to Property and Assets
- Violations of Policy

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 codes 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 established the AUI Ethics & Integrity Line. 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. Corporate misconduct can threaten the livelihood 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 a cause for concern. Your reporting can minimize the potential negative impact on the company and for you and your colleagues. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

- The AUI Ethics & Integrity Line is linked directly to the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specified individuals within AUI at a senior level who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has been trained to keep these reports in the utmost confidence. Depending on the report received, the AUI President may involve the Research center Director, other AUI and Research center managers and staff, the AUI Audit Committee Chairperson and the Chairperson of the AUI Board of Trustees, and any other body or official, internal or external, as required to ensure a thorough review of the issue in question *while, at all times, maintaining AUI's firm commitment to confidentiality* (See the "[Reporting workplace concerns](#)" policy for specific details).

Who is responsible for addressing my concerns/resolving my complaint?

- The AUI Ethics & Integrity Line ensures the ultimate responsibility for a proper response to complaints of unethical or illegal conduct is at the apex of AUI's authority structure i.e. to the AUI President (or the Chair of the AUI Audit Committee if the complaint is against the AUI President).
- The cases will be managed in most respects at the Centers, but the AUI President must be aware of any case outcomes and acknowledge his consent with them. He must at all times strive for a thorough and impartial investigation of the report, a reasonable and reasoned judgment and the maintenance of confidentiality, as and when requested,

Reporting Security & Confidentiality

Any report I send from a company computer generates a server log that shows every website 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 your work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website.

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 system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity. You can file an EthicsPoint report from any computer that can access the Internet. Many public locations, including the public library, have Internet computers.

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, 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..."
- See the AUI "[Reporting Workplace Concerns](#)" policy for more detailed guidance.

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.

What if I want to be identified with my report?

- There is a section in the report for identifying yourself, if you wish.

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 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?

- Yes. All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

Is there any case where confidentiality may be waived?

- There are practical limits on our commitments to confidentiality. They may be waived if necessary to conduct a proper investigation or if we’re legally compelled to waive them. See the AUI “[Reporting Workplace Concerns](#)” policy for more detailed guidance.
- This system and the AUI policy is a more robust protector of confidentiality and anonymity in two ways: genuine anonymity is achieved, should the complainant wish, by the telephone hotline/web portal’s use of passwords that permit AUI to interact with complainants all the way through a case without being aware of the identity of the complainant. It also provides a commitment that AUI will communicate with a complainant on issues of confidentiality, if the general commitment to confidentiality may need to be waived, obtaining their input, before taking any action that changes confidentiality status.

Reporting & Retaliation

Could I suffer retaliation if I file a report because I believe someone has done wrong?

- No. Never. Retaliation will not be permitted in any form. Employees may request confidentiality, but will be protected appropriately whether or not they have requested confidentiality.
- As AUI promotes open, honest and constructive dialogue on all employee matters, it will never discriminate nor take retaliatory measures (discharge, demote, suspend, threaten, harass) against any employee who puts forward improvement ideas or, in good faith, raises a concern, makes a complaint or assists in the investigation of a report of a workplace concern.

What would happen if someone retaliated?

- You will be protected. Any intimidation, coercion, threats or discrimination against any individual or group who raises their concerns or who reports suspected wrongdoing is prohibited and will be subjected to appropriate disciplinary action, which may include the termination of the person(s) taking or suggesting action against the person or group raising concerns.

I’m worried about retaliation from senior management?

- Someone (with no relation to AUI!) once said, "If you 'blow the whistle' on somebody below you, you'll get a pat on the back. Above you? You'll be fired." It is very regrettable that the preceding saying was proven true at some companies in the past. AUI wishes to make it absolutely clear to everyone concerned, though, that all of us at AUI have a duty and are in service to a cause greater than ourselves; the advancement of knowledge. All investigations – regardless of the position in the organizational hierarchy of the alleged offender - will be handled honorably, with the utmost respect for sound business ethics and best human resource management practice.

I'm a manager or supervisor who supports this policy and good business ethics. What should I do?

- Recognize that your personal example on business ethics, just like other matters, will set the tone for your group
- Do not engage in any acts that could be perceived as favoritism; either with colleagues above or below you in the management hierarchy, with peers, with suppliers, facility users etc.
- Know the regulations governing your work duties and make sure your staff do too. If you or they need more or better training, make sure you request it and that it is provided.
- Appreciate that, for most employees, it takes courage to come to a supervisor with a problem.
- Be available and accessible to your staff and do not take actions that lead them to distrust you.
- Remember that by you maintaining confidentiality on relatively unimportant matters, your colleagues will know they can rely on you to maintain confidentiality when the stakes are higher.
- Investigate all allegations and, if there is a problem, act on them. Involve Human Resources, your own manager and/or the Ombuds if need be and document what you do and communicate your actions appropriately.
- Use the AUI Ethics & Integrity Line if that is the route that will give you most confidence in a proper result

What would happen if someone knowingly submitted a false accusation?

- Only in instances where AUI and/or its Research center(s) determine that a false report was made maliciously by an employee or group of employees, with the primary intent of harming the organization(s), or an individual within the organization(s), could adverse employment actions be considered against a person making a complaint or assisting in the investigation of a complaint. An employee's action in reporting concerns that are protected by statute or regulation does not automatically render him/her immune from discharge or discipline for legitimate reasons. As a safeguard against retaliation, any adverse actions related to allegations found to be false and malicious will require the full involvement and prior written consent of the AUI President.

Will I be believed if I report improper conduct?

- AUI accepts the overwhelming evidence indicating people who raise complaints via this type of hotline are usually very committed, well-liked employees who are knowledgeable about their organization and about acceptable standards of behavior. They decide, after much consideration, to raise their concerns via a tool like the AUI Ethics & Integrity Line because they believe it is right and proper to do so. They feel they "have to." That sense of obligation is admired and respected at AUI.

- Those reporting complaints will usually experience contradictory emotions (for example, mixtures of loyalty and disloyalty to friends, colleagues, superiors and the organization and its mission and service to the public and science community). We recognize that they may also experience a fear of being ostracized or criticized, or of having their complaints ignored. This will not happen. AUI considers the raising of good faith concerns as a loyal and responsible act in the interests of good employee relations and prudent management.
- Employees who are accused of improper conduct will have the right to have any charges against them presented in a manner that is fair and allows them to present their response to the charge/s. There will neither be an *a priori* assumption of guilt or innocence on the part of the accused employee nor of the motivations behind the reporter's complaint. Each case will depend on the specific circumstances and the detailed gathering and assessing of evidence conducted by senior management in an environment that is respectful of the rights of all involved and will allow for a fair and thorough investigation.

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?

- AUI chooses to promote 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 seemingly harmless lapse in ethics can have on an otherwise healthy company. So, 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. EthicsPoint 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 system and report distribution are designed so that implicated parties are not notified nor granted access to reports in which they have been named.

Can I still report my concerns using existing policy and processes?

- You can always use the various means to raise concerns (the employee consultation, grievance, respectful workplace conduct and Ombuds policies). The AUI Ethics & Integrity Line is offered as a complement or an alternative to these, if, for whatever reason, you consider the existing channels inappropriate or inadequate as a means of resolution.
- The Research centers will be able to manage complaints that are raised via its existing channels - employee grievances, Ombuds cases etc. - still protecting employee confidentiality and without the need even to involve AUI in those cases.

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

- If you don't have access to or are uncomfortable using a computer, you can call the AUI Ethics & Integrity Line by phone, toll-free. It is available 24 hours a day, 365 days a year.
- Calls offer English and Spanish support. The caller is able to send reports to be attached to any phone report. Reports via telephone are notified to AUI's nominated senior management representatives, translated if received in Spanish.