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About EthicsPoint

What is EthicsPoint?

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

Why do we need a system like EthicsPoint?

Our employees are our most important asset and by maintaining open channels of communication we promote a safe and professional work environment.

The EthicsPoint reporting system augments our other programs to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

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

What type of situations should I report?

EthicsPoint is designed for employees to report any violation of our stated Code of Conduct, business ethics or harassment policies.

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 a behavior you believe violates Stimson's code of conduct or other ethical business practices, we expect you to report it. Ideally, you should report any violations to your direct manager or other member of the management team. There may be situations when you are not comfortable reporting the issue in this manner. It is for exactly these types of circumstances that we partnered with EthicsPoint. This system allows the employee report inappropriate behaviors anonymously rather than keep the information to oneself.

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

Everyone who works at Stimson has the right to work in a professional environment. With that right comes the responsibility of all to act ethically and to report those situations when violations occur. Corporate misconduct can threaten the livelihood of the entire company. Working together we can maintain a healthy, productive and professional environment.

Does management really want me to report violations of our Code of Conduct and other ethical business practices?

Yes. 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 the reports go? Who may access them?

Reports are entered directly into the EthicsPoint secure server to prevent a breach in confidentiality. EthicsPoint makes these reports available only to those individuals within the company who are charged with evaluating the report, based on type of violation and location of the incident. Those responsible for receiving reports completed training in confidentiality requirements and proper handling.

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

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

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 Stimson's IP addresses so information linking your PC to EthicsPoint is unachievable. In fact, EthicsPoint is contractually committed to never pursue a reporter's identity.

If you are uncomfortable making a report via your work PC you have the option of using a PC outside our work environment (Internet café, friend's house, etc.) through the EthicsPoint secure website. EthicsPoint's data indicates that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

Filing a report from home, a neighbor's computer, or any internet portal remains secure and anonymous. The internet portal never identifies a visitor by screen name and the EthicsPoint system strips away internet addresses to ensure full anonymity is maintained. EthicsPoint is contractually committed to never 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 system is configured to protect your anonymity. To ensure there are no inadvertent disclosures of identity, remember, as a reporting party – you must ensure the body of the report does not inadvertently reveal your identity. For example, do not disclose items such as: *"From my cube next to Jan Smith..."* or *"In my 33-years at Stimson..."* or *"Since I transferred to the Portland office..."*

Is the telephone hot line toll-free, confidential and anonymous?

Yes. When submitting a hot-line report you are asked to provide the same information that is provide in an Internet-based report. The interviewer types your responses directly into the EthicsPoint Web site. Telephone reports comprise the same security and confidentiality measures applied to internet based reports.

What if I want to be identified with my report?

The report includes a section for the submitter to provide their identity.

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?

Stimson promotes ethical behavior. Unethical conduct, at any level, ultimately hurts the company and each employee, including you. You only have to consider recent corporate scandals to see the disastrous effects that occur to an otherwise healthy company from a lapse in ethics. If you ever observe any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report your observations.

I am unsure if what I observed or heard is either 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 report distribution program is 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? What if the company has further questions for me concerning my report?

When you file a report through either the EthicsPoint website or 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 enter additional details or answer questions posed by a company representative 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 enter into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are the follow-up details in reports as secure as the first submission?

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

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 Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.