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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 does CWB Group have a system like EthicsPoint?

We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and reinforce our culture of integrity and ethical decision making. We want you to feel comfortable bringing forward concerns and have partnered with EthicsPoint to provide you with a secure, confidential and anonymous means of communication.

Reporting – General

May I report using either the Internet or the telephone?

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

What type of situations should I report?

The EthicsPoint system is designed for you to report any violation of our Code of Conduct, or other concern you may have.

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

When you observe some behavior that you believe violates our Code of Conduct, we expect you to report it. Employees and contractors are encouraged to report matters of concern to their manager, next level manager, HR Business Partner or Ethics Officer. Vendors or other stakeholders are encouraged to report matters to the manager of the business location where the issue arose.

We recognize, however, that there may be circumstances when you are not comfortable reporting an issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. 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 our culture of ethics and integrity.

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 organization - 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 CWB Group and our people.

Where do these reports go? Who can access them?

EthicsPoint makes these reports available only to specific individuals within the CWB Group who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in handling these reports and keeping them 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 (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

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.

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...".

Is the telephone toll-free hotline 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 website. 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 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.

Tips & Best Practices

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. Additionally, employees or contractors may contact their manager, HR Business Partner or Ethics Officer for guidance.

What if I remember something important about the incident after I file the report? Or what if CWB Group has further questions for me concerning my report?

When you file a report at the EthicsPoint website 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 CWB Group 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 questions. By doing so,

you and the CWB Group will enter 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, they are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.