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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist ACC with its employees, members, sponsors and vendors, to work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- We believe that our employees, members, sponsors and vendors are important assets of the association. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- It is a best practice for associations to have a reporting vehicle to address accounting and auditing fraud and other illegal or unethical conduct.
- An effective reporting system will augment our other efforts 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 the ability to file a report via either the telephone or the Internet, with the option to remain anonymous. Note: some jurisdictions have limits on anonymity of certain types of reports. The EthicsPoint system will guide you on what you can and can not do if you are in one of those jurisdictions.

What type of situations should I report?

The EthicsPoint system is designed for employees, directors, members, independent contractors, consultants, sponsors and vendors of ACC or of ACC Chapters/divisions to report any suspected or actual legal or ethical violation. For example, you should report any concern that you may have regarding a suspected or actual violation (whether past, present or future) of any of the following rules:

- Federal, state or local laws, regulations and rules;
- [ACC's Employee Code of Conduct](#);
- [ACC's Comprehensive Compliance Reporting Policy and Procedures](#);
- Any other governing documents, policies and procedures of either ACC or an ACC Chapter or division.

For more details regarding ACC's compliance reporting policy and procedures, please read [ACC's Comprehensive Compliance Reporting Policy and Procedures](#).

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 code of conduct or one of govern documents, policies and procedure of either ACC or an ACC Chapter or division, we expect you to report it. Ideally, you should bring any concerns forward to your direct supervisor, or to ACC's Director of Compliance. 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 partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

EthicsPoint is only one of the channels through which you can report your concerns. To understand the various ways in which you can submit a report and how ACC will follow up, please read [ACC's Comprehensive Compliance Reporting Policy and Procedures](#). The main purpose of the EthicsPoint hotline is the option to submit your report anonymously.

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

We all have the right to work and engage in a positive environment, and with that right comes the responsibility of acting in an ethical manner, in compliance with the law, 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 and the sustainability of benefits that members of an association receive from their membership.

Does management really want me to report?

Yes, we certainly do. In fact, we *need* you to report. You know what is going on in our association - 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 association and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports, whether made directly through the hotline, or reported directly to ACC's Director of Compliance, are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within ACC 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 keeping these reports in the utmost confidence. The data is centralized, stored and processed in the United States for the purpose of investigating the concern reported and taking corrective action(s) where appropriate.

Who follows up on these reports and how?

ACC will analyze all compliance reports that it receives through the EthicsPoint hot line, and will take corrective action(s) where appropriate. For more detail regarding key ACC personnel involved in this process and to learn more about ACC's follow-up procedures, please consult [ACC's Comprehensive Compliance Reporting Policy and Procedures](#).

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 our association and this is a great tool to enhance that communication.

We have carefully chosen this reporting tool to support our commitment to compliance 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 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 PC to EthicsPoint is available in the EthicsPoint system. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity. . However, you should be aware that ACC has a robust records retention policy and archival system that saves logs of websites visited and telephone calls made.

If you feel uncomfortable making a report on your work computer or telephone, you have the option of using a computer or telephone outside of ACC's 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 (if you submit your report anonymously). An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is 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 when you file your report anonymously. 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, mentioning "From my cube next to Jan Smith..." or "In my 33 years..." may compromise the anonymity of your report.

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

Yes. Like the EthicsPoint internet system, the telephone hotline offers you the option to either identify yourself or remain anonymous (provided that reporting anonymously is allowed in the relevant jurisdiction). 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 submitted over the phone have the same security and confidentiality measures applied to them during delivery as reports that are submitted online.

What if I want to be identified with my report?

Whether you are reporting via the hotline over the phone or online, there is a section in the report for identifying yourself, if you wish. Your identity will be kept confidential to the fullest extent possible, unless doing so does not comply with the law or would prevent a full and effective investigation of the report. To the greatest extent possible, all personnel responsible for responding to such reports will maintain the confidentiality of the reporting individual and the matters related to the report.

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?

ACC chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the association, employees, members, sponsors and vendors, 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 organization. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your peers and colleagues 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 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 an association 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 association questions. You and the association 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?

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.