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About EthicsPoint

What is the EthicsPoint Line?

EthicsPoint is an on-line portal for reporting integrity and ethical concerns. EthicsPoint is staffed by a live operator from an independent company (NAVEX Global), 24 hours a day, 7 days a week. NAVEX Global is a leading provider of corporate ethics and compliance programs and hotlines worldwide and manages EthicsPoint to ensure independence and objectivity.

Calls or web-based reports are free, confidential and may be made anonymously. (The Ethicspoint system is structured to be compliant with applicable EU and in-country regulations regarding whistleblower hotlines and data protection.) Operators are equipped to take these calls and web-based reports in all primary languages of the countries in which we operate or do business. The operator or reporter will relay the information to Bazaarvoice's EthicsPoint distribution list and will provide you with a case number and call back date if desired.

How do I report a concern?

It is important to promptly report any situation which may violate the law or Company policy – whether you are involved in the situation or not. It is generally advised that you first report a suspected violation to your supervisor. If this is not a viable option, report it to your supervisor's manager, People and Talent, Legal or EthicsPoint. In addition, you can always email ethics@bazaarvoice.com

We encourage you to provide full information and your name in order to facilitate a complete investigation. We may not be able to investigate some matters, such as allegations of sexual harassment, without such information. Do not, however, investigate a situation on your own. Investigations may involve complex legal issues and acting on one's own may compromise the integrity of the investigation or adversely affect Bazaarvoice and its employees.

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 a positive work environment and maximize productivity.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

Can I be retaliated against for reporting a concern?

Bazaarvoice does not discriminate or retaliate against any person who asks questions or makes a good faith report of a suspected violation of law, the Code of Conduct or any ethics and compliance related policy or procedure. Likewise, retaliation against anyone who participates in an investigation will not be tolerated. A team member who believes that he or she has experienced retaliation for making a report or assisting in an investigation must report this as soon as possible using any of reporting mechanisms, including, but not limited to, ethics@bazaarvoice.com or EthicsPoint.

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 or ask a question via either the telephone or the Internet.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our stated Code of Conduct or Bazaarvoice policy; ask any question regarding our Code of Conduct or Bazaarvoice policy; or, report other concerns you may have.

If I see a violation, shouldn't I just report it to my manager or People and Talent and let them deal with it?

When you observe some behavior that you believe violates our Code of Conduct or Bazaarvoice policy, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management. 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 Navex/Ethicspoint. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know?

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 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 these reports go? Who can access them?

Reports 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 Bazaarvoice 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.

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.

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 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.

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?

Our company 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 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 username 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?

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