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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees 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 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.

# 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. Please note that in accordance with Academy policy, faculty, administrators and staff may not make anonymous reports of concerns of sexual misconduct, hazing, harassment, discrimination, or bullying.

**What type of situations should I report?**

The EthicsPoint system is designed to serve as an additional means for parents, students, faculty, staff or alumni to report any violation of our stated Code of Conduct, or other policy violations.

**If I see a violation, shouldn't I just report it to my dean, house counselor, teacher, manager, public safety, the CCC, or human resources and let them deal with it?**

When you observe behavior that you believe violates Academy policy, we expect you to report it. Ideally, you should bring any concerns forward to an adult on campus or for employees, to a manager or member of the Senior Administrative Council. 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. Please note that in accordance with Academy policy, faculty, administrators and staff may not make anonymous reports of concerns of sexual misconduct, hazing, harassment, discrimination, or bullying.

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

We all have the right to live, learn and 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 environment.

**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 community - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize potential negative impacts on the community. Also, offering positive input may help identify issues that can improve community culture.

**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 the Academy 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 maintaining confidentiality to the greatest extent possible in any given situation.

**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 community environment. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate concerns.

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 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 Academy-issued device you have the option of using an off-site device to access 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. Please note that in accordance with Academy policy, faculty, administrators and staff may not make anonymous reports of concerns of sexual misconduct, hazing, harassment, discrimination, or bullying.

**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. Please note that in accordance with Academy policy, faculty, administrators and staff may not make anonymous reports of concerns of sexual misconduct, hazing, harassment, discrimination, or bullying.

**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 not sure if what I have observed or heard is a violation of Academy 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 Academy representative and add further information that will help resolve open issues. When filing an anonymous report, we strongly suggest that you return to the site in the time specified to answer Academy questions. Please note that in accordance with Academy policy, faculty, administrators and staff may not make anonymous reports of concerns of sexual misconduct, hazing, harassment, discrimination, or bullying.

**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.