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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist ADP's Ethics Department in obtaining information about an issue or concern. You can use this helpline to confidentially report your concerns. If local law permits, your report can be anonymous.

### Why do we need a system like EthicsPoint?

- ADP believes that our associates are our most important asset. By creating open channels of communication, such as this helpline, we can promote a positive work environment and maximize productivity.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- 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 report via the internet. Telephone service is available in most locations; if a number is not listed you have the option of submitting a web report via the internet. You can also call the Ethics Office directly at 973-974-7377; send an email to [adp.ethics.helpline@adp.com](mailto:adp.ethics.helpline@adp.com); or send a detailed note with documents to ADP, Mail Stop 325E, One ADP Boulevard, Roseland, NJ 07068.

## What type of situations should I report?

The EthicsPoint system is designed for associates to report any violation of ADP's Code of Business Conduct & Ethics, or any other concern you may have. Individuals in France, Germany and Italy may only report concerns related to anti-bribery, auditing or accounting, banking or financial allegations, discrimination or harassment, security in the work place, and environment or anti-competitive practices.

## 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 behavior that you believe violates ADP's Code of Business Conduct & Ethics, we encourage you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of your management team. 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.

## Why should I report?

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.

## Does ADP's management really want me to report?

Yes. You may have knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on ADP and our associates. In addition, offering positive input may help identify issues that can improve our 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 provides these reports directly to ADP's Ethics

Department. The ADP Ethics Department will evaluate each report, based on the type of violation alleged and location of the incident. The ADP Ethics Department is fully trained on how to keep reports confidential.

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

The EthicsPoint system is a positive aspect of ADP's overall philosophy, and helps to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, communicate a concern or ask a question in a safe and confidential matter. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

# Reporting Security & Confidentiality

**It is my understanding that any report I send from ADP 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 computer 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 computer, you have the option of using a computer outside of ADP's work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website.

**Can I file a report from home and have it remain anonymous?**

If local law permits, 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. 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, if local law permits such reporting. If you feel more comfortable, you should avoid information in the body of the report that reveals your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

**Is the telephone toll-free helpline confidential and secure 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 as web based reports.

**What if I want to be identified with my report?**

There is a section in the report for identifying yourself.

## Tips & Best Practices

**I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Should I report it, why?**

Yes. ADP has a proud tradition of strong values of responsibility and integrity. All unethical conduct, at any level, ultimately hurts the company and all associates, 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 an incident of misconduct or ethical violation, you should report it.

**I am not sure if what I have observed or heard is a violation of ADP policy, or involves unethical conduct, but it just does not look right to me. What should I do?**

File a report. ADP would rather you report a situation that turns out to be harmless than let some 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 ADP 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 ADP representative and add further information that will help resolve open issues. ADP strongly suggests that you return to the site in the time specified to answer any possible additional questions and/or find out the status of your report. You and ADP now have entered into a "secure dialogue," where situations are identified and resolved (no matter how complex), without the fear of retaliation.

**Are these follow-ups on reports as secure as the first one?**

Yes. All EthicsPoint correspondences are held in the same strict confidence as the initial report.

**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 a toll-free helpline number, where available, or file a report with an EthicsPoint representative, 24 hours a day, 365 days a year. You can also contact the ADP Ethics Helpline directly by phone at 973-974-7377; by sending an email to [adp.ethics.helpline@adp.com](mailto:adp.ethics.helpline@adp.com); **or** by sending a detailed note with documents to ADP, Mail Stop325E, One ADP Boulevard Roseland, NJ 07068.