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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global, an independent third party, to assist Direct Relief in addressing fraud, abuse, violations of policies and procedures, and other misconduct.

Why do we need a system like EthicsPoint?

- Direct Relief requires its directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All employees, and representatives of Direct Relief are to practice honesty and integrity in fulfilling their responsibilities and to comply with all applicable laws and regulations.
- We believe that our directors, officers, employees, and volunteers are critical to the organization's mission. By creating an open channel of communication, we can promote a positive work environment and maximize productivity. As a non-profit public benefit corporation, we must have a clear process through which concerns, complaints, or allegations of wrongdoing may be raised through an anonymous reporting vehicle, reviewed in a confidential manner and if necessary investigated by an independent source to resolve the matter.
- 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.

What type of situations should I report?

The EthicsPoint system is designed for directors, officers, employees, and the general public to report any violation or suspected violation of policies and principles that are further outlined in our [Guiding Principles](#), [Whistleblower Policy](#), [Conflict of Interest Policy](#) and [Privacy Policy](#). Additional policies and procedures related to employees only can be found in our Employee Handbook. The Employee Handbook is provided to all employees upon their start of employment and updated on an annual basis.

If the general public observes behavior that violates Direct Relief's policies or principles, they are encouraged to report it to a member of the Board, human resources, or the management team and may also utilize EthicsPoint if they prefer to report their concern anonymously.

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 designated by Direct Relief (including the Chair of the Audit Committee, a member of the Board of Directors, in the event the designated person(s) is/are implicated in the report) who are charged with evaluating the report, based on the type of violation and location of the incident and deciding further action as necessary. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Reporting – Employees

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 a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire organization.

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

If an employee observes behavior they believe violates our policies and procedures outlined in our Guiding Principles, Whistleblower Policy, Conflict of Interest Policy, Privacy Policy and/or Employee Handbook (employees only,) we expect they will report it. Ideally, employees should bring any concerns forward to their direct manager, or another member of our management team. We recognize, however, that there may be circumstances when they are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. In keeping with the policy of maintaining the highest standards of conduct and ethics, Direct Relief will investigate any suspected fraudulent or dishonest use or misuse of Direct Relief's resources or property by employees, directors, officers, consultants, or volunteers. We would rather you report anonymously than keep the information to yourself

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 or violates our policies and procedures. Your reporting can minimize the potential negative impact on the organization and our people. Also, offering positive input may help identify issues that can improve culture and performance.

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 today's workplace and this is a great tool to enhance that communication.

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 Direct Relief computer generates a server log that shows every web-site that my Personal Computer (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 are an employee of Direct Relief and 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..."

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 844-573-4161, which is available 24 hours a day, 365 days a year.

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 a Communication Specialist from NAVEX Global answering the hotline will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery as a report filed directly on the Web site via the Internet.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

I become aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Direct Relief chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the organization. So if you are an employee and know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it. If you are not an employee and become aware of a potential violation to Direct Relief's policies and procedures you are encouraged to contact a manager, human resources, or utilize EthicsPoint to report your concern.

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 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.