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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 in working together to address 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.
- 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 either the telephone or the Internet; that report can also be anonymous where permitted by local law.<sup>1</sup>

## What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our stated Code of Conduct and Ethics Policy, additional employee policies such as ServiceNow's Anticorruption Policy or Acceptable Use Policy, or other concern you may have.

## If I see a violation, shouldn't I just report it to my manager, security, or human resources?

When you observe some behavior that you believe violates our Code of Conduct and Ethics Policy or other ServiceNow policy, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, other member of our management team, our HR department or our Legal department. 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 because we would rather you report confidentially and/or anonymously than keep the information to yourself.

## 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 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 of such activity on the Company and our people. Offering positive input may also help identify issues that can improve corporate culture and performance.

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<sup>1</sup> NOTE: Any reference to anonymous reporting herein only refers to anonymous reporting where permitted by local law. All reporting, however, whether done through in-person reporting or reporting through EthicsPoint, will be treated confidentially and shared only with persons on a need-to-know basis.

**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 Company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has a legal or ethical obligation to keep these reports in the utmost confidence.

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

The EthicsPoint system concentrates on being a positive aspect of our overall corporate philosophy, and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, or communicate an ethical concern. Effective communication is critical in today's workplace and this tool is provided to you to enhance that communication.

# Reporting Security & Confidentiality

**It is my understanding that any report I send from a Company computer generates a server log that shows every website that my computer connects with. 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 our work environment (such as a personal or public computer, etc.) through the EthicsPoint secure website. Many people choose this option.

**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 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?**

Speak to your manager, other Company management, HR, or Legal to address your concern. If you are not comfortable with this, 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.