

[About EthicsPoint](#)

[Reporting – General](#)

[Reporting Security & Confidentiality](#)

[Tips & Best Practices](#)

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting system monitored by NAVEX Global to assist management and employees in working together to address fraud, abuse, and other misconduct in the workplace, while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- 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

How do I make a report through EthicsPoint?

With EthicsPoint, you can file a confidential report by either telephone or a web-based portal. The report can also be anonymous where permitted by local law.¹

What type of situations should I report?

You should contact the EthicsPoint system if you have any questions or concerns about potential or actual violations of Company policies, our Code, or the law.

If the EthicsPoint system can't accept a question or report due to local laws, you are encouraged to talk with your manager, HR, or Legal.

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

We understand that it takes courage to speak up. We want you to be comfortable raising a concern, so we have a variety of methods to do so. Where permitted by the laws of your country, you can raise a concern anonymously.

¹ NOTE: Any reference to anonymous reporting herein only refers to anonymous reporting where permitted by local law.

When raising a concern, you are encouraged to provide as much detail as possible — the Company's ability to investigate will be substantially assisted if you provide fulsome information.

Why should I report what I know?

ServiceNow is committed to fostering an environment where open, honest communication is the expectation – not the exception. Our success depends on each of us upholding our core values of **integrity, ethical conduct, and honesty**.

Does management really want me to report?

Yes. Doing the right thing means speaking up whenever something doesn't seem right. All of the details are not needed to raise a concern – just a good faith belief that misconduct may be occurring. All concerns are taken seriously and investigated promptly and thoroughly. It is important to remember that you should not attempt to conduct your own initial investigation.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. EthicsPoint makes these reports available only to specific individuals within the Company who are charged with evaluating the report,

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 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 won't 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 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 an interviewer will type your responses into the EthicsPoint website. 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

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 website 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.

How much detail should I provide?

The more detail you provide regarding your concerns, the better opportunity the company has to review and evaluate your concerns.