

[About EthicsPoint](#)
[Reporting – General Reporting](#)
[Security & Confidentiality](#)
[Tips & Best Practices](#)

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX to assist organizations in addressing fraud, abuse, and other misconduct in the workplace.

Reporting – General

May I report using either the Internet or the telephone?

All employees have the ability to file a confidential, anonymous report via the Internet. US-based employees may also report via the telephone, at 888-309-1559.

What type of situations should I report?

The EthicsPoint system is designed for you to report violations of our Code of Ethics, Governance, and Responsibility (“Code of Ethics”), Principles Relating to Responsible Conduct, and related policies.

The following are examples of conduct that can be reported through EthicsPoint:

FINANCIAL

Fraud
Theft
Financial Misconduct
Accounting/Audit Concerns
Procurement Fraud
Destruction of Documents
Billing Practices
Bribery and Kickbacks
Embezzlement
Travel and Expense Policies Violations
Falsifying Documents
Misappropriation of Funds
Illegal Payments to Third Parties
Conflict of Interest

WORKPLACE SAFETY AND SECURITY

Sexual and Other Unlawful Harassment
Sexual Exploitation and Abuse and Child Safeguarding
Discrimination

Workplace Bullying
Trafficking in Persons
Personal Conduct
Health or Safety Violations
Scientific or Research Misconduct
Retaliation

If I see a violation, how should I report it?

When you see behavior that you believe violates our Code of Ethics, Principles Relating to Responsible Conduct, or related policies and procedures, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or your Human Resources Business Partner or HR Director. We recognize, however, that there may be circumstances where 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.

Why should I report what I know?

We all have the right to work in a positive and safe environment and with that right comes the responsibility of acting in an ethical manner and letting PATH know if someone is not acting appropriately. Financial and other workplace misconduct can harm employees and beneficiaries, threaten the livelihood and reputation of the entire organization, and jeopardize PATH's mission.

Does PATH 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. Your reporting can minimize the potential negative impact on fellow colleagues and beneficiaries of our work, the organization, our reputation, and our mission.

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 organization who are charged with evaluating the report. Report recipients keep these reports in the utmost confidence.

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, 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 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, information you provide in your report may reveal your identity by accident, and therefore anonymity is not guaranteed. If you wish to remain anonymous, provide your information in such a way that protects your anonymity.

Is the telephone toll-free number for US-based employees 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

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

Ethical behavior is critical to our mission and our credibility with donors. Unethical conduct, at any level, ultimately hurts the organization and all employees, including you. You only have to consider what happened in recent company scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy organization. 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?

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?

Only a few individuals in the organization are designated to receive reports. In addition, 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 organization 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 by Internet (or phone in the US) and access the original report to add more detail, answer questions posed by a PATH representative, and/or add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer questions the organization may have. If you don't answer those questions, PATH may not be able to obtain enough information to understand, follow-up on, and resolve the issue.

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.

Can I still file a report if I don't have access to the Internet?

You will need Internet access. 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.