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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist employees in addressing potential fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why does Incyte need a system like EthicsPoint?

We believe that our employees are our most important asset. By creating open channels of communication such as EthicsPoint, we can help promote a positive work environment and maximize productivity. An effective reporting system compliments our other efforts to foster a culture of integrity and ethical decision-making. U.S. publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud.

Reporting – General

May I report using either the Internet or the telephone?

In the United States, Switzerland, Canada and Japan, you have the ability to file a report via either the telephone or the Internet. In all other countries, you have the ability to file a report via the Internet only.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our stated Code of Conduct, or other concern you may have as permitted by local law.

If I see a violation, shouldn't I just report it to my manager, other members of management, Compliance, Legal, Compliance, or Human Resources and let them deal with it?

We encourage you to approach your manager, other members of management, Compliance, Legal, or Human Resources with your questions or concerns. We recognize that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that Incyte encourages you to use this tool. Remember, it is your obligation as an Incyte employee to report potential misconduct and ask questions when necessary.

Why should I report what I know? What's in it for me?

Remember, it is your obligation as an Incyte employee to report potential misconduct and ask questions when necessary. Additionally, 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 Incyte really want me to report?

Absolutely. 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 timely report can minimize the potential negative impact on the company and our people and even prevent or remedy potential misconduct before it takes place.



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Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent possible breaches in security. EthicsPoint makes these reports available only to specific individuals within Incyte who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Reporting Security & Confidentiality

Is there ever an instance where I will not be able to remain anonymous?

In some countries, local laws might prohibit you from remaining anonymous. You will be prompted by the phone operator or the EthicsPoint website to provide your identity where this applies.

It is my understanding that any report I send from an Incyte computer or device generates a server log that shows every website that my PC or device 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 or device to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to seek a reporter's identity unless anonymous reporting is prohibited by local law. If you feel uncomfortable making a report on your work PC or device, you have the option of using a PC or device 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 anywhere ... home, a neighbor's computer, or any Internet portal will remain secure and anonymous, unless anonymous reporting is prohibited by local law. 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 seek a reporter's identity unless anonymous reporting is prohibited by local law.

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, as permitted by local law. 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...". Of course some level of specificity is necessary to help Incyte look into the matter more closely.

Is the telephone toll-free helpline confidential and anonymous too, if permitted by local law?

Yes. You will be asked to provide the same information to EthicsPoint 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.



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What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish. In some countries, local laws might prohibit you from remaining anonymous. You will be prompted by the phone operator or the EthicsPoint website to provide your identity where this applies.

Tips & Best Practices

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?

You should consult your manager, another member of the management team, Compliance, Legal, or Human Resources or you may file a report instead. EthicsPoint can help you prepare and file your report so it can be properly understood. Remember you are obligated to report potential misconduct and 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 allegedly implicated parties are not notified or granted access to reports in which they have been named. At Incyte, we prohibit retaliation in all forms and are committed to encouraging a culture where employees can freely ask questions and raise concerns.

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 Report Key (unique user name) and are asked to choose a password. You can return to the EthicsPoint system again 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 to answer company questions.

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 where permitted by local law.

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

You can file an EthicsPoint report from any computer or device 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 or device, in the United States, Switzerland, Canada and Japan, you can call the EthicsPoint toll-free helpline, which is available 24 hours a day, 365 days a year.