

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive reporting tool created by NAVEX to assist employees and other stakeholders who wish to ask a question about our policies or report illegal behavior or other ethical misconduct in the workplace.

What is “Ask The CEO”?

The “Ask The CEO” feature allows you to submit a question to CyrusOne’s CEO, either via email or via the site if you wish to remain anonymous.

What happens when I contact the CyrusOne Ethics Line?

When submitting a question or filing a report, you will be asked to provide the most detailed information possible about the question or incident. You may choose to remain anonymous when submitting your question or report; however, doing so may limit a full investigation of the matter.

When submitting your question or report, you will be given a report key and asked to create a personal password. You will need this information to access the "Follow up on Report" section on the Web site to check the status of the matter you reported. We ask you to follow-up on your inquiry or report within five to ten business days. Continued follow-up on a matter is particularly important for anonymous reports, where we have no other means to communicate with a reporter.

What should I do if I lose my Report Key or password?

If you no longer have your report key or password, you will no longer be able to access your report and you will be required to file a new report. The use of the report key and password is integral to maintaining a high level of confidentiality. You can mention in your new report that this matter relates to another report you previously filed.

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 or submit a question via either the telephone or the Internet. Note, the “Ask The CEO” feature is available only through the website (if you wish to remain anonymous) or via the email address provided on the website.

What types of questions or situations should I report?

The EthicsPoint system is designed for employees or other stakeholders (for example, customers, vendors, business partners) to report any violation of our policies, including our Code of Business Conduct and Ethics, or other unethical or illegal business conduct. If you have a question or concern about our Code of Business Conduct and Ethics or other policies, or how our policies apply to a particular situation or set of facts, you may submit the question on the website by clicking “Ask a Question” or calling the telephone number provided on the website.

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

CyrusOne urges you to use this resource whenever you have a question or concern that cannot be readily addressed within your work group or through your supervisor. First consider whether you are comfortable raising your concern directly, such as to your manager, your manager’s supervisor or your local HRBP. Individuals within the company have indicated that, while sometimes challenging, directly addressing issues and or concerns with those involved can be very effective. If you are uncomfortable raising your question or reporting your concern, if you do not know whom to contact, if you believe your question or concern has not been satisfactorily addressed, or if you wish to remain anonymous, you may “Ask a Question” or “Submit a Report” through EthicsPoint.

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 or ask questions?

We certainly do. In fact, we *need* you to ask questions and report misconduct. 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 on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

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 and investigating the report or answering the question, based on the nature/type of violation or question. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates log that shows every website that my 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 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, a public library, 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 submit a question or 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 submit a question or file a report if I don't have access to the Internet?

If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.. The phone number can be found on the main page via "Submit a Report" and selecting the country in which you are located.

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 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 or question?

There is a section 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?

File a report or Ask a Question. EthicsPoint can help you prepare and submit your question or report so it can be properly understood. We'd rather you raise a question or 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 or questions in which they have been named.

What if I remember something important about the incident after I file the report or ask the question? Or what if the company has further questions for me concerning my report or question?

When you file a report or ask a question at the EthicsPoint Web site 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.

Are these follow-ups on reports as secure as the first one?

Yes, all EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.