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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 addressing fraud, waste, abuse, and other misconduct in the workplace, all while cultivating a positive work environment and instilling confidence and trust from the community.

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.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.
- The public trust is one of the most important tenets of City government. EthicsPoint and the City's Fraud Policy help to ensure transparency and integrity within the City.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential and anonymous report either by filling out an online form or by calling the toll-free hotline.

What type of situations should I report?

The EthicsPoint system is designed for members of the public or employees to report any known or suspected instances of fraud, waste, or abuse as defined in A.R. 130, or other concerns about misconduct in the workplace.

As an employee, if I see a violation, to whom should I report it?

In accordance with the City's Fraud Policy, if you discover or suspect fraudulent activity, you should contact your department head immediately. Department heads have the primary responsibility to coordinate all investigations with the Audit Division and other necessary agencies or authorities having jurisdiction. If your department head is the subject of your report, you should make your report directly to the City Manager.

We recognize that there may be circumstances when you are not comfortable reporting your concerns in this manner. It is for such circumstances that we have partnered with EthicsPoint to provide the ability for employees to submit reports anonymously, on a 24/7/365 basis. We would rather you report anonymously than keep the information to yourself.

As a resident, City contractor or vendor, if I see a violation, shouldn't I just report it to City Hall or the Police Department and let them deal with it?

When you observe behavior that you believe should be reported, we strongly encourage you to report it to a City official. The City strives to be transparent and we hope that anyone with such concerns will bring that information forward. We recognize that there may be circumstances when you are not comfortable reporting your concerns in this manner. It is for such circumstances that we have partnered with EthicsPoint to provide you with the ability to submit reports anonymously, on a 24/7/365 basis. We would rather you report anonymously than keep the information to yourself.

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

Fraud, waste, abuse and/or misconduct can threaten the livelihood of the entire City. We all have the right to live and work in a positive environment. With this right comes the responsibility of acting in an ethical manner and letting the appropriate people know if you suspect misconduct. By working together, we can maintain a healthy and productive environment.

Does the City really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our City—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 City and our people, and may help identify ways that overall workplace culture and levels of service can be improved.

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 City who are charged with evaluating the reports based on the type of violation. Each of the report recipients has been trained in maintaining the utmost confidence in the reports and the process.

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

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

We have carefully chosen an appropriate and effective reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security & Confidentiality

Isn't it possible for my IP address to be tracked by the website and therefore record me as a reporter?

EthicsPoint <u>does not generate or maintain</u> 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 or home PC, you have the option of using a PC outside of your normal 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 work, 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 completely maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

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 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.

What if I want to follow up on my report? How can I ensure steps are being taken to address the issue I reported?

Reporters may choose to identify themselves and provide their contact information directly while making the report. This will ensure accurate information is attained or can be acquired later if needed by the investigator. Additionally, after making a report, reporters will be provided with a unique passkey identifying their specific report, and they will create a password that can be used to follow-up on the progress of their report. The investigator will provide comments as needed through this avenue.

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?

The City chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the City, the community, and all employees of the City. So if you know of any incidents of misconduct or ethical violations, consider it your duty to the City and to the larger community to report it.

I am not sure if what I have observed or heard is a violation of City 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 would 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 City has further questions for me concerning my report?

When you file a report on the EthicsPoint website or through the hotline, you will receive a unique user name and will choose a password. You can return to the EthicsPoint system by either Internet or telephone and access the original report to add more detail or answer questions posed by a City 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 any questions. You and the City 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.

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

You can file an EthicsPoint report from any computer that can access the Internet. Many public locations, including the public library, have computers with Internet access. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24/7/365.