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About EthicsPoint

What is EthicsPoint?

EthicsPoint is an independent third party that we have partnered with to provide a confidential way to report your concerns of fraud, abuse, misconduct and other Code of Ethical Business Conduct violations in the workplace.

Why do we need a system like EthicsPoint?

- Our employees are our most important asset and we are serious about living up to the standards in our Code of Ethical Business Conduct. By creating open channels of communication, we can learn about and address problems.
- An effective reporting system is an important part of our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

What happens if I forget or lose my report key and/or password?

When you submit a report, you will be asked to create a password and you will receive a report key. You must keep this information. It is the only way you can access your report in the future in order to receive updates and make follow-ups. If you lose this information, you will need to file a new report. NAVEX and Saltchuk cannot retrieve this information for you.

May I report using either the Internet or the telephone?

Yes. You have the ability to file a confidential, anonymous report via either the telephone or the Internet.

What type of situations should I report?

You can report any violation of our Code of Ethical Business Conduct, or any other serious concern you may have that is not otherwise being addressed.

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

When you observe some behavior that you believe violates our Code of Ethical Business Conduct, we expect you to report it. Ideally, you should bring any concerns forward to your supervisor, human resources or a member of your management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. So for these circumstances, we have partnered with EthicsPoint to create this hotline. 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?

We all want to work in a company that lives its values. We can't fix problems unless we are aware of them. By working together, we can maintain a healthy and productive environment. Misconduct can threaten the livelihood of an entire company.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our company - both good and bad. You may be aware of an activity that could be cause for concern. Your reporting can minimize the potential negative impact on the company and your coworkers. Also,

offering constructive feedback or 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 to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company 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 confidential.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as the person who completed the report?

EthicsPoint is an independent third party. 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. Your company will only know that you completed the report if you allow them to.

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 your home, 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, 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 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 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?

We encourage identification, since it makes it much easier to get all of the relevant details and to look into your concerns. 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?

Our values are extremely important to us. 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. 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?

The EthicsPoint system and report distribution are designed so that those accused of doing something wrong 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 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 unique report key 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 where your continued input can help the company reach a resolution.

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 can I file a report?

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. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, 1-800-270-7513, which is available 24 hours a day, 365 days a year.