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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global, a leader in ethics and compliance management, to assist organizations in creating a positive, productive work environment by providing a hotline and portal through which employees and third parties may report instances of illegal activities and other misconduct in an anonymous manner.

As an outside service provider, contracted by Pew Research Center, NAVEX Global's goal is to ensure that staff and third parties have an additional platform to communicate issues and concerns associated with unethical or illegal activities safely and honestly with management, while maintaining confidentiality and anonymity. The EthicsPoint tool also provides a way for an investigator to communicate with the person reporting the concern. The tool allows an investigator to ask follow-up questions and provide updates, while respecting and maintaining the reporter's anonymity.

### Why do we need a system like EthicsPoint?

- We believe that our employees are our most important asset. As such, we endeavor to create open channels of communication, promote a positive work environment, and operate with the highest ethical standards.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

## Reporting – General

### May I report online or by phone?

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

### What type of situations should I report?

The EthicsPoint system enables you to file a confidential and anonymous report of any illegal activities or misconduct, including violation of Pew Research Center policies, by visiting the website or calling the toll-free hotline.

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

If you observe a behavior that you believe violates our Code of Ethics, we expect you to report it. Ideally, you, as an employee, should bring any concerns to your direct manager, a member of our management team, legal affairs or human resources. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. In these situations, EthicsPoint is an alternative. We would rather you report anonymously than keep the information to yourself.

### Why should I report what I know?

As stewards of the resources provided to us, we are each obligated to hold true to the values of the organization. To honor this, you must immediately report possible violations of our Code of Ethics if you observe, experience, or learn of it—even if it seems that the conduct is helping to further our goals or mission. Our organization's success is to be achieved *only* through the highest level of ethical conduct.

### Does management really want me to report?

Yes - in fact, we need you to report. You know what is going on in our organization - both good and bad. Your reporting can minimize the potential negative impact on the organization's goals, our reputation and our staff. Also, your report may help identify issues that can improve our organizational culture and overall performance.

### Where do these reports go? Who can access them?

To prevent possible security breaches, reports are entered directly on the EthicsPoint secure server. EthicsPoint makes these reports available only to specific individuals within the organization who are charged with evaluating the report, based on the nature and severity of the violation. Each of these recipients is required to keep these reports in confidence. By contract, anonymous reports are recorded in the system and provided to management in a way that eliminates any identification of the person making the report. No one at the Center will ever receive the name or identity of the person making an anonymous report.

**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 workplace. You are encouraged to seek guidance on ethical dilemmas or communicate a concern. We have carefully chosen the best reporting tool and vendor to help us meet our compliance obligations while providing an easy and effective way for individuals to remain anonymous when reporting concerns.

# Reporting Security & Confidentiality

**If I send a report from my work computer, will you be able to identify me as the person who filed the report?**

Information linking your computer to EthicsPoint is never available. In addition, EthicsPoint is contractually prohibited from pursuing a reporter's identity.

The EthicsPoint site is available from any computer or mobile device (including smart phones and tablets). If you are uncomfortable making a report using your work computer, you can use any device outside of the work environment. Most reports are filed outside of the work setting; EthicsPoint 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. Our internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is completely maintained. In addition, 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..." The report should provide enough information for action to be taken, but not so much that you would be identified.

**Is the telephone toll-free hot line confidential and anonymous too?**

Absolutely. When you call, you will be asked to provide the same information that you would provide in an online-based report and an interviewer will type your responses into the EthicsPoint website. You will never be asked to identify yourself or where you are calling from. Reports logged via the hotline receive the same level of security and confidentiality.

**What if I want to be identified with my report?**

If you would like to come forward and be identified, you may do so. In the online report, there is an optional section for self-identification. Please remember, identifying yourself is not required; we would rather you report anonymously than keep the information to yourself.

## Tips & Best Practices

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

Our organization promotes ethical behavior. Unethical conduct, at any level, ultimately hurts the organization and all employees, including you. You only have to consider what happened in recent corporate scandals to see the harmful effects that a seemingly small lapse in ethics can have on an otherwise healthy organization.

If you know of any misconduct or ethical violation, it is your duty to report it.

### **I am not sure if what I have observed or heard is a violation of the organization's policy, or involves unethical conduct, but it just does not look right to me. What should I do?**

File a report. If something just doesn't seem right, report it and let the experts sort it out. You don't need to have all the facts; trust your instincts. EthicsPoint can help you file your report so it can be understood and appropriate action can be taken. 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 manager or the organization's leadership is involved in a violation? Won't they receive the report and have the opportunity to cover it up?**

The EthicsPoint system and report distribution process are carefully designed to protect those who file a report. Implicated parties are never notified or granted access to reports in which they have been named. In fact, only specific, authorized staff at the organization will ever see the facts of a report. Should the authorized point of contact be implicated by name, EthicsPoint has been instructed to share the details with another ethics advocate within the organization. By contractual arrangement, EthicsPoint is not allowed to share any report with staff beyond those authorized; all investigations are impartial and conducted fairly.

### **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 through EthicsPoint, by phone or online, you receive a unique user name 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 representative of the organization and add further information that will help resolve open issues. We strongly encourage you to return to the site to respond to the organization's questions. With your username and password, you and the organization may engage in an ongoing, anonymous dialogue, to uncover the facts of the situation. The details you provide will help lead to full 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.

**Can I still 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. Calling EthicsPoint assures you the same confidentiality afforded to those who use the website.