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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist GFI management and employees work together in addressing workplace misconduct or any other issues employees would like to discuss anonymously.

Why do we need a system like EthicsPoint?

- Open communication is a core value of GFI. By creating open channels of communication, we can promote a positive work environment, ethical culture, and maximize productivity.
- We always encourage direct conversations with anyone at GFI, but it is understandable that employees might prefer an anonymous way to raise an issue. EthicsPoint is the way to do that.

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 via either the telephone or the Internet.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of GFI's Code of Conduct, or other concern you may have.

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

Absolutely. When you are aware of behavior that you believe violates GFI's Code of Conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, a GFI Director, or the Executive Director. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue this way. This is why we have EthicsPoint. 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 can't have the culture of integrity and ethical behavior we want at GFI without you. If GFI is not aware of inappropriate conduct or something that is damaging team morale, it can't be fixed. 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 something is wrong or could be better. By working together, we can maintain a healthy and productive environment.

Does management really want me to report?

Yes, it's critical. You know what is going on at GFI - 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 GFI and our team. Also, offering positive input may help identify issues that can improve our culture and our ability to meet our mission.

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 GFI 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.

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

The EthicsPoint system concentrates on being a positive aspect of our culture of open communication, and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical and this is a great tool to enhance that communication.

Reporting Security & Confidentiality

It is my understanding that any report I send from GFI computer or Google Drive generates a server log that shows every web-site 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, 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, "As the newest member of the Innovation Department..." or "In my 10 years working at Georgia Tech...".

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?

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 report it?

All unethical conduct, at any level, ultimately hurts GFI and all employees, including you. Small things add up over time, and a seemingly harmless lapse in ethics can lead to serious effects on GFI.

Most importantly, problems are easier to fix when they are small. We always prefer to steer something back to the right course rather than wait until things are so bad we are lost and have to find our way back. So, if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and other GFI team members to report it.

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

File a report. You don't need to figure this out, there are others at GFI who have that job. 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?

No. 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. When individuals who normally would get a report are named or identified, the reports are sent to other individuals so integrity of reporting is not compromised.

What if I remember something important about the incident after I file the report? Or what if GFI 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 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 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 any questions. Everything is done through 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?

Yep. 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. 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, which is available 24 hours a day, 365 days a year.