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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 associates in working together to address fraud, abuse, and other misconduct in the workplace, while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- We believe that our associates 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.

Reporting – General

May I report using either the Internet or the telephone?

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

What type of situations should I report?

The EthicsPoint system is designed for associates to report any violation of our stated Code of Conduct, or other concern you may have.

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

When you observe behavior that you believe violates WoodmenLife's Code of Conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with 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 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 ethically. By working together, we can maintain a healthy and productive environment.

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 organization - both good and bad. You might have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the organization and our members and associates. Also, offering positive input may help identify issues that can improve our 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 organization who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has received training in keeping these reports in the utmost confidence.

How does this benefit WoodmenLife?

The EthicsPoint system helps us maintain 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 in today's workplace, and this is a great tool to enhance that.

Reporting Security and Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with. Won't this log identify me as a report originator?

If you send a report from a work PC, WoodmenLife has the technical ability to identify you. If you want to send a report while ensuring your anonymity, you have the option of using a PC outside our work environment (such as one located at home, 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.

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 to not pursue a reporter's identity.

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 maintained. Plus, EthicsPoint is contractually committed to not 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 ensure anonymity, you - as a reporting party - need to ensure that the body of the report does not reveal your identity accidentally. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

Is the telephone toll-free hotline confidential 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.

Tips and Best Practices

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

WoodmenLife promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the organization and all associates, including you. You only have to consider what has 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, your coworkers and our members 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 doesn't 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 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 company has further questions for me concerning my report?

When you file a report at the EthicsPoint website 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 to help resolve open issues. We strongly suggest that you return to the site in the time specified to answer questions. You and EthicsPoint now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are follow-up reports as secure as the first one?

All EthicsPoint correspondence is 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 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 hours a day, 365 days a year at 844-339-3053.