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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a confidential and comprehensive reporting tool created by NAVEX Global to assist management and employees in working together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- Our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- This reporting system will augment our other efforts to maintain a culture of integrity and ethical decision-making.

Reporting – General

How do I file a report?

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

What type of situations should I report?

You should report any violation of our Employee Handbook, or other concerns you may have that are in violation of Billtrust's policies, or the law.

Who should I report a violation to?

If you observe behavior that you believe violates our company policies, it is expected that you report it. All concerns should be brought forward to your manager or Human Resources. We recognize 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 is it important for me to report what I know?

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 may be in violation of our policies. 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 company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Reporting your concerns can minimize the potential negative impact on the company and our people. 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 company who are charged with evaluating the report, based on the type of violation and location of the incident.

Reporting Security & Confidentiality

Can I file a report from work and still remain anonymous?

Yes, you can file a report using your work computer and still remain anonymous. If you feel uncomfortable doing so, you have the option of using another computer outside of the work environment or you can call the toll-free hot line to make a report.

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

Can I file a report from home and still remain anonymous?

Yes, you can file a report from your home using your personal computer or a friends' computer, as 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 workstation 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?

There is a section in the report for identifying yourself, if you wish.

Tips & Best Practices

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

Our company chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. If you are aware 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 seem right to me. What should I do?

You can go to your manager or Human Resources, or file a report. 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 Human Resources is involved in a violation?

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 on the EthicsPoint Web site or through the EthicsPoint Call Center, you will receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system at any time, by Internet or telephone to add additional information or to answer questions that the company has asked. We strongly suggest that you return to the site in the time specified to answer any company questions. You and the company 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.