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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential third-party reporting tool owned by NAVEX Global, a UKG contractor, to assist management and employees in working together to address workplace concerns and questions, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- We believe that our employees are our most important asset. By creating multiple channels of communication, we are able to ensure that employees feel comfortable raising concerns and that those concerns can be addressed promptly.
- An effective reporting system, using EthicsPoint, will strengthen our culture of communication, integrity, and ethical decision making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you can file a confidential, (either named or anonymous) report via the telephone or the Internet.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of the law, of our Code of Conduct, company policies, or other workplace misconduct as well as or questions related to such misconduct.

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 some behavior that you believe violates the law, our Code of Conduct, company policies, or other workplace misconduct we expect you to report it. You may certainly bring any such 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 feel comfortable reporting (anonymously if you prefer and if permitted by local law) than keep the information to yourself.

Why should I report what I know? What's in it for me?

We all have a responsibility to act in an ethical manner and to let the right people know if someone is not acting appropriately. 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. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive 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, a process designed to prevent any breach in security. Access to the EthicsPoint system is limited to the General Counsel and limited members of her staff, and they are responsible for assuring appropriate handling of reports.

Reports received will be investigated and appropriate action taken where necessary. If you are a reporter, the system provides options for you to check the status of your report and communicate

further with the company (anonymously where you choose that status and it is permitted). Reports and resulting investigations and actions are maintained as confidential to the greatest extent possible.

Isn't this system like a "Big Brother" example of someone watching over me?

The EthicsPoint system does not initiate or conduct any activity proactively. It is a tool you may choose to utilize that provides an opportunity for employees to raise concerns and ask questions, which we believe is a positive aspect of our overall philosophy, and allows us to further assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern if you believe that a violation of the law, our Code of Conduct, company policies, or other workplace misconduct has occurred. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen what we believe to be the best reporting tool to meet our compliance obligations and continue to foster a culture of integrity at UKG.

Reporting Security and Confidentiality

It is my understanding that any report I send from a company computer generates a server log, 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 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 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 toll-free telephone ReportingLINE 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.

Data Privacy and Protection

I can't seem to report in my country...why?

Data privacy protection laws and requirements vary by country. In some cases, we may not be able to currently accept any reports in your country due to these data restrictions. If you receive a "redirect" message when attempting to submit a report, please convey your concern to your local manager, supervisor, or HR representative.

Do I have to consent to certain data privacy notices to submit a report?

Yes, prior to submitting your report, you will be required to provide consent to having read and agreed to the **Data Protection & Privacy Notice**.

The Data Protection & Privacy Notice is presented electronically (via the Web Intake Site). If you choose to submit a report orally (via call center representative), you will be directed to the Web Intake Site to review and provide consent to having read the Data Protection and Privacy Notice. This notice includes, but is not limited to, the following components of data privacy regulations:

- The reporting system is hosted by an unaffiliated third-party, NAVEX Global;
- The reporting is voluntary;
- The reporter will not be sanctioned for submitting information in good faith;
- The reporter may be reprimanded for knowingly providing false or misleading information;
- The only data collected is that which is necessary for the purposes of the investigation;
- The data will be treated confidentially;
- NAVEX Global is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement;
- UKG will evaluate the information provided and may store the information during their investigation;
- Parties implicated in an alleged violation may be informed about the report and will have the right to respond to or correct the information submitted;
- Parties implicated in an alleged violation will not be informed of the reporter's identity;
- Any information submitted that is unnecessary for the investigation will be deleted or archived as permitted by local laws;
- All personal information collected will be either deleted or archived as soon as practicable following completion of the investigation, as permitted by local laws;
- UKG will take adequate steps to secure the information submitted; and
- NAVEX Global will adequately secure personal data collected and not use it for unauthorized purposes.

What information is captured when I do submit?

The system captures the following information: the reporter's name and contact details (if disclosed), any questions the reporter may have, the name and title of all individuals the reporter may be reporting about, and a description of any questionable conduct, including all relevant details.

Can I be confident that my data is safe?

The collection, use, and retention of all personal information is treated with the utmost confidentiality and NAVEX Global has certified that it adheres to privacy standards of notice, choice, onward transfer, security, data integrity, access, and enforcement. The reports collected by NAVEX Global are made available to UKG via a secure, software-based case management system for the appropriate research and investigative process to take place by the designated UKG representative.

What happens to my report after resolution?

Any and all personal information collected through the ReportingLINE will be either deleted or archived as soon as practicable following completion of the investigation, as permitted by local laws.

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?

Our company chooses to promote ethical behavior. As is stated in our Code of Conduct, all employees have a responsibility to abide by, as well as report, non-compliance. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. If you know of any incidents of misconduct or ethical violations, or just have questions, it is important to bring it forward and 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 or unlawful behavior go unchecked because you weren't sure.

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 encourage you return to the site in the time specified to answer company questions.

Are these follow-ups on reports as secure as the initial report?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity if that was your original wish.

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, as well as any public locations, including the public library, that have computers with access to the Internet. If you don't have access to, or are uncomfortable using a computer, you can call the EthicsPoint toll-free ReportingLine, which is available 24 hours a day, 365 days a year.