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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 employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

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

- 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, 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 our stated Code of Conduct, or other concern you may have, including compliance issues.

## **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 our code of conduct, we need and 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 appropriately. By working together, we can maintain a healthy and productive environment.

## **Does management really want me to report?**

We certainly do. Actions can't be corrected without us knowing about them. You may have knowledge of an activity that may be cause for concern and this report may minimize the potential negative impact on the company and our employees. Also, offering positive input may help identify issues that can be highlighted and encouraged.

## **I'm a customer or a provider of your services. How does making this report help me?**

Your awareness and knowledge of something improper or of concern is just as important as our employees' observation. We want to know what you see through your eyes so we have the opportunity to correct it and provide you with the assurance we are worthy of your business and partnership.

## **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. The SVP of Human Resources is the primary investigator and has received training on how to keep EthicsPoint reports in the utmost confidence. All reports and findings are also shared with the Chief Executive Officer. The volume and nature of incidents are reported monthly or quarterly to the Compliance Committee.

## **Reporting Security & Confidentiality**

**It is my understanding that any report I send from a company computer or laptop generates a server log that shows every website my PC connects with. Will 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 always have the option of using a PC outside our work environment through the EthicsPoint secure website or placing a phone call. 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 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 7 years here..."

**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 website. These reports have the same security and confidentiality measures applied to them.

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

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

## Tips & 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. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. A seemingly harmless lapse in ethics can have a disastrous effect on an otherwise healthy company. So 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 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 cover it up, or worse, retaliate against me?**

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. And retaliation is strictly prohibited at our company and by law.

### **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 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 company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved in this manner.

### **Are the report follow-ups 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?**

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.