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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive, secure and confidential reporting tool developed and managed by NAVEX Global, which is mounted over a telephone call center and an internet platform, with the objective of helping management, employees and stakeholders work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

NAVEX Global was the first organization in the world to offer hotline and case management solutions to companies, and today they are the largest and most trusted provider of intake and incident reporting services in the world, working with more than 13,000 customers around the globe, including 95 of the Fortune 100 companies, and reaching more than 40 million employees and stakeholders. For more information on NAVEX Global please visit www.navexglobal.com.

Why do we need a system like EthicsPoint?

- At EnerAll we believe that our employees and stakeholders are valuable and must be heard and taken into account.
- We also acknowledge that there may be circumstances when you could feel uncomfortable reporting an issue to your manager or to human resources. In such cases, we don't want you keeping such information to yourself, and we believe that an independent, anonymous, and secure reporting vehicle such as EthicsPoint, could perform well as an alternative reporting vehicle.
- And by creating such open channels of communication, we believe we can promote a positive work environment, maximize productivity, and ultimately foster a culture of integrity and ethical decision-making.

What will EnerAll do with the information provided?

- EnerAll will start an investigation.
- You can return to the EthicsPoint system again either by Internet or telephone, and check the status of the issue, using the username and password created during the reporting procedure.

Reporting – General

May I report using either the Internet or the telephone?

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

What type of situations could be reported?

The EthicsPoint system is designed for employees and stakeholders 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 some behavior that you believe violates our 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 Navex Global. 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 and live in a positive environment and with that right comes the responsibility and the possibility 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. Corporate misconduct can threaten the livelihood of an entire company.

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. 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 via the internet or the call center, 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. Each of these report recipients has had training in keeping these reports in the utmost confidence and he/she is committed to do so.

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

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, 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 in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting - Security & Confidentiality

It is my understanding that any report I send from a company computer 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, or using the call center to place a report.

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

Yes. 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.

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 bother reporting it?

EnerAll chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees and stakeholders, including you. A seemingly harmless lapse in ethics can have disastrous effects on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, you have an option to report, consider it your duty to yourself, to your coworkers and to the community as a whole.

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. 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 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, 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.

Can I still file a report if I don't have access to the Internet?

Yes, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.