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About EthicsPoint

Q. What is EthicsPoint?

EthicsPoint is a comprehensive reporting tool created by Navex Global to ensure confidential reporting through the *CalSTRS Compliance and Ethics Hotline*. The tool allows you to anonymously report any concerns of noncompliance or unethical behavior and supports our commitment to an ethical culture.

Q. Why does CalSTRS need a system like EthicsPoint?

By creating additional open channels of communication, we can continue to promote a positive work environment and ethical culture. An effective reporting system will enhance our other efforts and continue to foster a culture of compliance, integrity and ethical decision-making.

Reporting – General

Q. May I report using either the Internet or the telephone?

Yes, you may file a secure, confidential and anonymous report online at **calstrshotline.ethicspoint.com** or by phone using our toll-free number, **1-844-895-9120**. Both are available to you 24 hours a day, 365 days a year.

Q. What type of situations should I report?

Any questions or concerns related to suspected noncompliance with laws, regulations, CalSTRS policies and standards, unethical behavior as supported by CalSTRS' Code of Ethics and Business Conduct, or any other compliance and ethical related concerns.

Q. If I am an employee and witness a violation, shouldn't I just report it to my manager or Human Resources and let them deal with it?

This reporting tool is not intended to replace or supersede existing reporting methods. You are still encouraged to express any concerns to your direct manager, other members of our management team, or Human Resources. We recognize you may not be comfortable reporting in this manner and have provided you a confidential and anonymous reporting line. When you observe behavior that you believe violates CalSTRS' Code of Ethics and Business Conduct, compliance with laws, regulations, policies and standards applicable to CalSTRS, or unethical conduct, it is your responsibility to report. We encourage you to not keep this information to yourself.

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

Non-compliant or ethical violations can cause serious loss or harm to CalSTRS, employees, members and business partners. We all have a responsibility of acting in an ethical manner and letting the appropriate people know if violations with laws, regulations, policies or standards are taking place. By working together, we can maintain a healthy and productive environment. Therefore, it is everyone's responsibility to assist in preventing these activities. Preserve CalSTRS culture of integrity; you make a difference!

Q. Does management really want me to report?

Yes. We want everyone to report suspected violations. You know what is going on and may have initial knowledge of an activity that may be a cause for concern or risk. Your reporting can *minimize* the potential negative impact on CalSTRS, employees, members, and business partners. Also, your input may help identify issues that can improve CalSTRS' ethical culture and performance.

Q. Where do these reports go? Who can access them?

Reports are entered directly into EthicsPoint's secure server to prevent any possible breach in security. These reports are available only to specific individuals within CalSTRS who are charged with evaluating the report based on the type of violation and location of the incident. Any persons named in the report will not have access to this evaluation. Each of these report recipients has engaged in training to ensure reports are kept in the utmost confidence.

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

No, this is a tool that allows CalSTRS to ensure a safe, secure and ethical environment. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions or communicate a concern. Effective communication is critical in today's business culture and this is a great tool to enhance that communication. We have carefully chosen EthicsPoint as a reporting tool to meet CalSTRS' compliance obligations, while maintaining a positive reporting environment.

Tips & Best Practices

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

CalSTRS is committed to compliance with laws, regulations, policies and standards that apply to our business; we strive to act with the highest standards of business ethics. Unethical conduct, at any level, ultimately hurts CalSTRS, employees, members and business partners. Consider what has happened in recent organizational scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy organization. If you know of any incidents of non-compliance or ethical violations, consider it your duty to report it.

Q. I am not sure if what I have observed or heard is a violation of policy or involves unethical conduct, but it just does not look right to me. What should I do?

You are encouraged to file a report. The CalSTRS Compliance and Ethics Hotline can help you prepare and file your report so it can be properly understood. We prefer you report a situation that may turn out to be harmless than allow possible unethical behaviors go unchecked.

Q. If I am an employee and my supervisor or other managers are involved in a violation, will they receive the report or be notified?

The system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

Q. What if I remember something important about the incident after I file the report? Or what if the reviewer has further questions for me regarding my report?

When you file a report online or by phone, you will receive a unique user name and create a password of your own. This will give you the opportunity to follow up on your report, either online or by phone. You may access your original report, provide additional information, details, attachments and answer questions the reviewer may have for you. We strongly suggest that you follow up on your report in the time specified, to answer any questions. You and the designated reviewer will share an "anonymous dialogue," where situations can be identified and resolved, no matter how complex.

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

Yes, you can file a report by calling the CalSTRS Compliance and Ethics Hotline using our toll-free number, **1-844-895-9120**. The hotline is available to you 24 hours a day, 365 days a year.

Q. Are these follow-ups on reports as secure as the first one?

Follow up reports and all correspondences have the same security and confidentiality measures applied to them as the original report.

Reporting Security & Confidentiality

Q. If I send a report from a computer within CalSTRS' organization, will it generate a server log that shows every website my PC connects with and identify me as the report originator?

The reporting tool *does not* generate or maintain any internal connection logs with IP addresses, so no information linking your PC to the reporting tool is available. Industry trends indicate that fewer than 12% of reports are generated during business hours, meaning that most people prefer to report from the comfort of their home after hours or on weekends.

Q. 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. The reporting tool will strip away any internet address so that anonymity is completely maintained, and the internet portal will never identify a visitor by screen name. EthicsPoint is contractually committed not to pursue a reporter's identity.

Q. I am concerned that the information provided when reporting to the CaISTRS Compliance and Ethics Hotline will ultimately reveal my identity. How can you assure me that will not happen?

This reporting tool is designed to protect your identity. You will be provided with the option to remain anonymous or provide your name. If you wish to remain anonymous, you as the reporting party need to ensure that the body of the report does not reveal your identity by accident, for example, "From my cubicle next to Jan Smith..." or "In my 33 years...".

Q. What if I want to be identified with my report?

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

Q. Is the telephone toll-free hotline 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 CalSTRS Compliance and Ethics Hotline website. These reports have the same security and confidentiality measures applied to them during delivery.