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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 in working together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment. Through EthicsPoint, you may ask questions and raise concerns via a telephone line or web intake form. EQT collectively refers to these resources as the EQT Ethics HelpLine.

Why do we need a system like EthicsPoint?

- Employees should have several ways to ask questions and raise concerns about violations of applicable law, our Policies or the Code of Business Conduct and Ethics.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.

Reporting – General

May I report using either the web intake form or the telephone line?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the web intake form or the telephone line.

What type of situations should I report?

You may ask questions and raise concerns about any possible violation of applicable law, our Policies or Code of Business Conduct and Ethics.

If I see a violation, shouldn't I just report it to my supervisor or Human Resources and let them deal with it?

When you observe behavior that you believe violates applicable law, our Policies or Code of Business Conduct and Ethics, you should report it. Ideally, you should bring any concerns forward to your direct supervisor, another member of our management team or Human Resources. 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.

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 or question.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with - 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.

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.

Is the telephone line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in the web intake form 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?

Our company chooses to promote ethical behavior. Reporting concerns and raising questions helps us to protect our organization – and one another. If you know of any incidents of misconduct or ethical violations, you have a 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. 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 receive the report and try to cover up their wrongdoings?

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 through the web intake form or through the telephone line, you are asked to choose a password/PIN (that is at least 4 characters/digits) and you receive a unique report number/username. You can return to the EthicsPoint system again either through the web intake form 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 to answer any questions the company may have in order to properly investigate and close out the report.

If I follow-up on a report, may I remain anonymous if I chose to do so when filing my initial report?

Yes, if you choose to not identify yourself in your initial report, all correspondence thereafter may also be anonymous.