

## Ethics Point FAQs

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## About Ethics Point

### What is Ethics Point?

Ethics Point is a comprehensive and confidential reporting tool created by NAVEX Global to help management and employees work together in the fight against fraud, corruption (including bribery), money laundering, abuse and other conduct undue workplace, all while cultivating a positive work environment.

### Why do we need a system like Ethics Point?

- ✦ We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- ✦ An effective reporting system will increase our other efforts to foster a culture of integrity and ethical decision-making.
- ✦ Ensure confidentiality and anonymity in the handling of reported information.

## Reporting – General

### **Can I report over the Internet and phone?**

Yes. With line of ethics, you have the ability to file a confidential and anonymous report via the phone 6671414 ext.3560 and the Internet by clicking [here](#).

### **What kind of situations should I report?**

The Ethics Line system is designed for employees to report any violation of our established Code of Conduct or other concerns they may present.

### **If I see a violation, shouldn't I just report it to my boss immediately?**

When you notice any behavior you think violates our code of conduct, we expect you to report it. Ideally, you should report any concerns towards ethics and compliance management.

We recognize that there may be circumstances in which you are not comfortable reporting the problem in this way. This is why we have partnered with Ethics Point to find a confidential reporting channel and avoid omitting such information.

### **Why should I report?**

We all have the right to work in a positive environment and with that right comes the responsibility to act ethically and let the right people know if someone is not acting properly. 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 you to report?**

Of course I do. In fact, we need you to report. Because these situations can create opportunities for improvement in order to prevent potential risks from materializing and affecting the entire organization.

You may have initial knowledge of an activity that may be of concern. Your reports can minimize the potential negative impact on the company and our people. In addition, providing positive information can help identify issues that can improve corporate culture and performance.

### **Where are these reports going? Who can access them?**

Reports are entered directly into The Ethics Point Secure Server to avoid any possible security breaches. This tool makes these reports available only to specific people within the company who are responsible for evaluating this information, depending on the type of violation and the location of the incident. Each of these report recipients has been trained to keep these reports confidential.

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

This system focuses on being a positive aspect of our overall philosophy, and allows us to ensure a safe 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 for improving that communication.

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

## Reporting Security & Confidentiality

### **Through my computer, can you identify that I was the one who made the report?**

This application does not generate or maintain any internal connection records with IP addresses, so no information linking your computer to Ethics Point is available. In fact, Ethics Point contractually undertakes not to register the identity of the person reporting.

If you feel uncomfortable reporting on your work computer, you have the option to use a computer outside of our work environment (such as one located in an internet café, at a friend's house, etc.) through the Ethics Point secure website. Many people choose this option, as Ethics Point data shows that less than 12% of reports are generated during business hours.

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

There is a section on the report registration form to identify yourself, if desired.

## **Tips & Best Practices**

### **¿I'm aware of some people involved with unethical behavior, but it doesn't affect me. Why should I bother reporting it?**

At SUMMUM we promote ethical behavior. Any unethical conduct, at any level, ultimately harms the company and all employees, including you. You just have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless ethical lapse can have on a healthy company. So if you know of any incidents of misconduct or ethical violations, consider it your duty to you and your co-workers is to report it.

### **I'm not sure if what I've observed or heard is a violation of company policy, or involves unethical conduct, but it just doesn't seem right to me. What should I do?**

File a report through the ethics line form, this can help you prepare and submit your report so that it can be properly understood. We prefer that you report a situation that is harmless than let possible unethical behavior go unchecked because you were unsure.

### **What if my boss or other managers are involved in a violation? Won't you get the report and start a cover-up?**

The Ethics Point system and the distribution of reports are designed so that the parties involved do not receive notifications or be granted access to the parties involved in which they have been named.

### **What if I remember something important about the incident after I file the report? Or what if the organization has more questions for me about my report?**

When you submit a report on the Ethics Point website or through emails arranged for the ethics line ([lineaetica@summumcorp.com](mailto:lineaetica@summumcorp.com), [oficialcumplimiento@summumcorp.com](mailto:oficialcumplimiento@summumcorp.com)), you will receive a unique username and be asked to choose a password. You can go back to the Ethics Point system again online or over the e-mail and access the original report to add more details or answer questions posed by a company representative and add more information that will help resolve open issues. We strongly suggest that you return to the site in the specified time to answer company questions. You and the company have now entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex they are.

### **Are these reporting traces as secure as the first?**

All Ethics Point correspondences are kept in the same strict trust as the initial report, continuing under the umbrella of anonymity.

### **Can I file a report if I don't have Internet access?**

You can file an Ethics Point report from any computer that can access the Internet. You can file the report from home. Many public locations, including the public library, have Internet computers. If you do not have access or feel uncomfortable using a computer, you can call the ethics line within business hours or leave a message.