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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global that enables management and employees to work together to address fraud, abuse, and other misconduct in the workplace while cultivating a positive work environment. Additionally, in situations where you prefer to place an anonymous report in confidence, EthicsPoint provides you the opportunity to do so.

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

- Our people are our most important asset. By creating open channels of communication, with effective reporting systems, we promote a positive work environment and culture of respect, integrity, and ethical decision making

# Reporting – General

## How do I file a report or concern?

EthicsPoint enables you can file a confidential, anonymous report or concern by phone or electronically.

## What types of situations should I report?

The EthicsPoint system allows staff to report any violation of our stated Code of Conduct, or other concern they may have. Security events/potential incidents of security concern (P-IOSC) must be reported through (509) 375-2400 per guidance found in HDI “Report an Event or Unwanted Condition.”

Areas of concern that are addressed by the Code of Conduct include, but is not limited to: Harassment, Scientific Integrity, Time Billing, Management Concerns, Conflict of Interest, Retaliation, Gifts and Gratuities, and Misuse of Property.

## 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 Team Leader or another member of our management team. We recognize however, that there may be circumstances when you are not comfortable reporting the issue in this manner. That’s why we have partnered with NAVEX Global – to provide a venue for our staff to report anonymously.

## Why should I report what I know? Does management really want me to report?

We certainly do. In fact, we *need* you to report. You may have initial knowledge of an activity that may be cause for concern, and by working together we can maintain a healthy and productive environment. Your reporting can minimize the potential negative impact on PNNL and our staff.

## Where do these reports go? Who can access them?

Reports are entered directly on a secure server. EthicsPoint makes these reports available only to specific individuals within PNNL 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. EthicsPoint also provides you the opportunity to place an anonymous report in confidence.

**What if my report may include sensitive project information such as potentially classified or export controlled information?**

Do not include any potentially sensitive information (i.e. classified information, export controlled information, controlled unclassified information, etc.) during reporting. Security events/potential incidents of security concern (P-IOSC) must be reported through (509) 375-2400 per guidance found in HDI "Report an Event or Unwanted Condition."

**Should I use this to submit a security clearance reportable (i.e. legal, financial, cohabitation)?**

No. To file a security clearance reportable please email the information to Personnel Security per guidance found in HDI "Reporting Requirements for Security Clearance Applicants and Holders."

## Reporting Security & Anonymity

**It is my understanding that anything sent from my work computer can be traced back to me. How can I anonymously submit my concern electronically?**

EthicsPoint, an external resource for PNNL, does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer to EthicsPoint is available.

If you feel uncomfortable making a report on your work computer, you have the option of using a computer outside our work environment (such as your home computer, one located at an Internet café, or at a friend's house) through the EthicsPoint secure website.

**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 allows you to select an option to remain anonymous through the reporting process. If you wish to remain anonymous during the reporting process then you - as a reporting party - need to ensure that your report does not reveal your identity. For example, "From my cube next to Jan Smith..." or "In my 33 years...".\*

**Is the telephone toll-free hot line 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 anonymity measures as those given electronically.\*

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

There is a section in the report to identify yourself. Or, remember that there are many other ways you can report concerns at PNNL (e.g., line management, Human Resources, Employee Concerns, and to DOE directly).\*

\* **NOTE:** While you may select the option to preserve your anonymity during the disclosure of your concern, your identity may need to be revealed to the people who conduct or engage in the resultant inquiry or investigation process to enable a thorough and comprehensive review of the concern that you raise.

## Tips & Best Practices

### **What if I am aware of some individuals acting unethically, but it doesn't affect me. Should I report it?**

PNNL promotes ethical behavior. Unethical conduct, at any level, ultimately hurts PNNL's reputation and its employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy company. If you know 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. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

### **What if my supervisor or other managers are involved in a violation?**

The EthicsPoint system and report distribution minimize the potential for notification to implicated parties before inquiry or investigation processes are undertaken. DOE and Battelle have policies prohibiting any form of retaliation.

### **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 number called a "Report Key" 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 PNNL representative. We strongly suggest that you return to the site in the time specified to answer any questions that may be raised. You and PNNL now have entered into an "anonymous dialogue."

### **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 before the inquiry or investigation processes are initiated.

### **What if I lose my Report Key or forget the Password I created?**

To maintain security and confidentiality, if you lose your report key or password, you will need to file a new report. Mention that a related report was previously submitted.