

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global, Inc. to address corporate fraud, abuse, and other organizational misconduct.

Liveops has chosen to contract with NAVEX Global, Inc. to receive confidential hotline and web-based reporting tool services in furtherance of its commitment to its compliance program.

Reporting – General

What types of situations should I report?

The EthicsPoint system is a reporting system that Liveops has created to allow for the anonymous and confidential reporting of potential breaches or violations of Liveops' business and ethics compliance program. This can include concerns about internal controls, violations of the applicable code of conduct, breaches of applicable law or regulation, or other types of misconduct that put the company at risk.

I'm a corporate employee. If I see a violation of Liveops code of conduct or employee handbook, shouldn't I just follow the reporting process in the employee handbook and report it to my manager, security, or human resources and let them deal with it?

As a corporate employee, if and when you observe some behavior that you believe violates the company's code of conduct and puts the company at risk, Liveops expects you to raise your concern directly to an internal resource, such as your direct manager or human resources 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 than keep the information to yourself.

I'm not a corporate employee. Can I still use the reporting tool to report a business conduct concern?

Yes, if you do not know whom to contact, or believe your concern has not been satisfactorily addressed, please proceed with filing a report through NAVEX Global.

How can I report my concern to NAVEX Global?

You have two options for reporting concerns to NAVEX. You can complete a report using this online website, or you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year and speak with an EthicsPoint communication specialist. Either method will result in the creation of a report on the EthicsPoint secure server. NAVEX Global makes these reports available only to specific individuals within the company who are charged with evaluating the report. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Should I report anonymously or identify myself?

Liveops will make reasonable efforts to hold your name in confidence during any investigation that results from a report you filed if you choose to identify yourself. If you choose to remain anonymous, you may report your concern without identifying yourself (but make sure you do not include any personally identifying information in your report). In some situations, applicable law and regulation may require the disclosing of your information during an investigation.

How does NAVEX Global provide confidential reporting?

NAVEX Global is committed to the integrity and confidentiality of its hotline and does not use functionality such as Caller ID to trace phone calls. In addition, NAVEX Global does not generate or maintain any internal connection logs with IP addresses.

What happens after I report my concern?

You will receive a unique, randomized number called a “Report Key” and will be asked to choose a password. Keep this in a safe place as you will use this to follow up on the report, or to communicate further regarding the concern.

After 5-6 business days, use your report key and password to check your report for feedback or questions.

Can I add more information after I file the report?

Yes, you can return to the site using the Report Key and password generated when you filed the report to access the original report to add more detail.

In addition, you can return to the site to engage in a dialogue with a company representative. Please make sure you return to the site to answer any questions concerning your report.

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.

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

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

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

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint tollfree hotline, which is available 24 hours a day, 365 days a year.

Does management really want me to report a business concern?

Yes, misconduct and noncompliance jeopardize the existence of the company. By reporting a business concern that you know about, you are opening the channel of communication and allowing an opportunity for Liveops to address the concern. Effective communication is critical in fostering healthy, productive communities. If you choose to file a report, know your input is valued and Liveops appreciates your support and dedication to upholding the company's values.