

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a confidential reporting tool operated by a third party, NAVEX, that enables management, employees, and our business partners to work together to address fraud, abuse, and other misconduct to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. EthicsPoint enables you to file a confidential, anonymous report via either the telephone or the Internet.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. NAVEX makes these reports available only to specific individuals within the company 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.

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 the report originator?

NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside your work environment (such as one located at an Internet café or at a friend's house) through the EthicsPoint secure website. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.

What if I want to be identified with my report?

There is a section in the report to identify yourself, if you wish.

What if my boss or other managers are involved in a violation?

The EthicsPoint system and report distribution ensures that implicated parties are not notified or granted access to reports in which they have been named. CopperPoint will never retaliate against anyone who makes a report in good faith.

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, randomized 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 company representative. We strongly suggest that you return to the site in the time specified to answer questions. You and the company will have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.