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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.

Why do we need a system like EthicsPoint?

- Our employees are our most important asset. By creating open channels of communication, we promote a positive work environment and maximize productivity.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

Should I use EthicsPoint to report a potentially dangerous situation?

- **EthicsPoint is *not* 911 or an emergency service!**
- Do not use this site to report events presenting an immediate threat to life or property.
- Reports submitted through this service may not receive an immediate response.
- If you require emergency assistance, please call 911 on an outside telephone line or contact your local authorities without delay.

How do I file a report?

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

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 toll-free hotline, which is available 24 hours a day, 365 days a year.

What types of situations should I report?

- EthicsPoint is designed to allow the reporting of any violation of our policies, procedures, or other concerns you may have.

If I see a violation, should I not just report it to my manager, security, or human resources?

- When you observe behavior you believe violates our policies or procedures or causes you concern, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or other member of our management team, however, we recognize 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.

I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?

- TCSG promotes ethical behavior. All unethical conduct, at any level, ultimately hurts TCSG, the technical colleges, all 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. NAVEX Global can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

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

- The EthicsPoint system and report distribution ensure that implicated parties are not notified or granted access to reports in which they have been named.

Where do these reports go? Who can access them?

- To help instill an atmosphere and culture of trust and respect for the anonymity of reporters, reports are not made to TCSG, but entered directly on the EthicsPoint secure server. NAVEX Global makes these reports available only to specific individuals within TCSG who are charged with evaluating these reports.

Reporting - Security & Confidentiality

May I make an anonymous report?

- Yes. Please understand, however, that in some instances it may be impossible, unethical, or inappropriate for TCSG to act upon a report without further information. In such cases, you will be asked for clarifying information via the EthicsPoint website or call center.

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 Global does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.
- If you feel uncomfortable making a report on your work computer, you have the option of using one outside our work environment (such as one located at an Internet café or at a friend's house) through the EthicsPoint secure website.

Can I file a report from home and still remain anonymous?

- A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name, and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. In addition, 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 protects 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. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

Is the telephone toll-free hot line confidential and 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 website. 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 to identify yourself, if you wish.

Reporting – Follow-Up

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

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.

Are these report follow-ups as secure as the first?

- All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

When will I hear back from someone? How long does the process take?

- In general, you should expect an initial response from a TCSG representative within 5 to 6 business days. Please note that it may take much longer to investigate and resolve any issues.