**About EthicsPoint** 

Reporting – General

**Reporting Security & Confidentiality** 

**Tips & Best Practices** 

### **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 and our members are our most important assets. 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**

#### 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.

#### What types of situations should I report?

The EthicsPoint system allows individuals to report any violation of our stated Code of Ethics and Standards of Professional Conduct, or any other concern you may have.

# If I see a violation, shouldn't I just report it to an IES staff member, board member, or human resources and let them deal with it?

When you observe some behavior that you believe violates our code of ethics and standards of professional conduct, we expect you to report it. Ideally, you should bring any concerns forward to a member of the IES management 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 implemented the EthicsPoint reporting service. We would rather you report anonymously than keep the information to yourself.

#### Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. And, corporate misconduct can threaten the very existence of an entire organization.

#### Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our organization - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can <u>minimize</u> the potential negative impact on the organization and our staff and members.

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

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

## **Reporting Security & Confidentiality**

It is my understanding that any report I send from a company computer generates a server log that shows every website that my device connects with. Won't this log identify me as the report originator?

NAVEX Global <u>does not generate or maintain</u> any internal connection logs with IP addresses, so no information linking your device to EthicsPoint is available.

If you feel uncomfortable making a report on your work device, you have the option of using a device outside your work through the EthicsPoint secure website. Many people choose this option, as NAVEX Global's data shows that fewer than 12% of reports are generated during business hours.

#### 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.

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 online-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.

## **Tips & Best Practices**

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

Our organization promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the organization and all employees/members, including you. Unethical conduct may have disastrous impact if it remains unreported. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your colleagues to report it.

I am not sure if what I have observed or heard is a violation of the IES 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.

What if I remember something important about the incident after I file the report? Or what if the IES has further questions for me concerning my report?

When you file a report at the EthicsPoint website 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 online or by 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 company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

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, provide internet-enabled devices. 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.