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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX to assist management and employees in working together to address suspected Code violations, accounting concerns, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- SEI's employees are our most important asset. By creating open channels of communication, we promote a positive work environment and maximize productivity. Non-employees may also report a concern through this system.
- An effective reporting system will augment 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. With EthicsPoint, you have the ability to file a report by phone call, mobile reporting via a QR code, or the website. You can choose to provide your contact details or remain anonymous.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any suspected violation of SEI's Code of Conduct, accounting concerns, or any other concern you may have.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them address it?

When you observe some behavior that you believe violates SEI's Code of Conduct or other policies, we expect you to report it. You should feel comfortable raising any concerns to your direct manager, Workforce Development (HR), other member of SEI's management team, or a member of the Legal and Compliance team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. As such, we have partnered with NAVEX. We would rather you make a report than keep the information to yourself.

Why should I report what I know? What are the benefits of reporting?

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 company.

Does management really want me to report?

Management certainly does. You know what is going on in our company. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on SEI and its people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

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 SEI who are designated with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients is aware of their responsibility in maintaining these reports in the utmost confidence and only sharing information on a need-to-know basis to review and address the matter.

How does this system help SEI meet its goals?

SEI is proud to partner with EthicsPoint as part of our overall philosophy of promoting a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide suggestions, or communicate a concern. Effective communication is critical in today's workplace, and this is a great tool to enhance that communication. We have carefully chosen this reporting tool to meet our compliance obligations while maintaining a positive reporting and working environment.

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 PC connects with, and won't this log identify me as a 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. If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside SEI's work environment, or using the mobile QR code to report via your personal mobile device. Many people choose this option, as NAVEX'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, if you choose to remain anonymous. An Internet portal never identifies a visitor by screen name, and the EthicsPoint system strips away Internet addresses so that anonymity is maintained.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. Can you assure me that will not happen?

The EthicsPoint system is designed to protect 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 desk 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 Web site. 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 for identifying yourself, if you wish.

Tips & Best Practices

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

SEI promotes ethical behavior. All unethical conduct, at any level, may ultimately impact SEI, its clients and/or its employees. 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 seem right to me. What should I do?

File a report. NAVEX 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 because you weren't sure.

What if my boss or other managers are involved in a violation? Will they receive a copy of the report?

The EthicsPoint system and report distribution are designed so 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 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 any questions. You and the company now have entered into a "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, and updates from EthicsPoint will only be shared with designated SEI recipients.

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