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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

May I report using either the Internet or the telephone?

Yes. EthicsPoint enables you to file a confidential report via either the telephone or the Internet. You may also elect to have your report filed anonymously through either option.

If I see a violation of our Code of Conduct or if I have any other concern, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

Ideally, you should bring any concerns forward to your direct manager or another member of our 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 partnered with NAVEX Global to provide the EthicsPoint confidential reporting tool.

Why should I report concerns?

Axiom fosters a safe and open work environment and we encourage our employees to report violations of company policies or other concerns so that they may be addressed accordingly.

Can I also provide positive feedback?

Yes, we also want to know the ways in which Axiom is positively impacting corporate culture and employee well-being. We can continue to expand and improve upon initiatives that are proven to be successful for our employees.

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 our HR Director and/or General Counsel, as administrators within the company who are responsible for evaluating and responding to the report, based on the type of violation and location of the incident. In the event of a conflict of interest, Axiom's outside counsel in the US will be responsible for evaluating and responding to the report.

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. 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 PC, you have the option of using a PC outside our work environment through the EthicsPoint website. It will still remain secure (and anonymous, if you so choose).

If I select the option to remain anonymous on my report, 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. If you select the option 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 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 to identify yourself, if you choose.

Tips & Best Practices

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

Our company promotes ethical behavior. All unethical conduct, at any level, can be damaging to the company and its employees. If you know of any incidents of misconduct or ethical violations, we ask you 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 and we will review it against our company policies including the Code of Conduct.

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 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 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 company questions.

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.

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.