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## About EthicsPoint and the Compliments and Concerns Hotline

### What are EthicsPoint and the Compliments and Concern Line?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX that enables management and employees to keep open channels of communication and to work together to maintain a positive and productive work environment. At Vibe Restaurants, we call this tool our Compliments and Concerns Hotline.

## 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 system allows employees to report any violation of our stated Code of Conduct, or other concerns. Our system also allows you to recognize or compliment a manager, supervisor, or coworker.

### If I see a violation, shouldn't I just report it to my manager?

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, yes, you should bring any concerns forward to your direct manager or other 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 and implemented the Compliments and Concerns Hotline.

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

Reports are entered directly on the EthicsPoint secure server. The reports are 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.

# 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 does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

**Can I file a report from home and 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 Compliments and Concerns telephone 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. This often means someone will reach out directly to you to address your concern. Again, if you are recognizing or complimenting a manager, supervisor, or coworker, you will need to identify yourself.

## **Tips & Best Practices**

### **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. You and the company now have entered 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 a Compliments and Concerns 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 hotline, which is available 24 hours a day, 365 days a year.