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The IP Global Helpline web portal and call center are run by a trusted independent vendor called Navex.

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX 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

If I have an ethical concern or become aware of a violation, how should I report it?

You have several options for raising and reporting ethical concerns:

- Meet with your manager in person. Talking about on-the-job issues is the best way to solve most of them.
- Contact your HR representative.
- Contact Environmental Health & Safety Manager
- Contact Global Enterprise Security Management
- Contact the Global Ethics and Compliance office.
- Call the HelpLine or use our online reporting tool.

If you are uncomfortable going through any of these resources, or if your most immediate resource is part of the problem, please find another way to raise your concern. Don't ignore it.

What kinds of situations should I report?

Any violation of our Code of Conduct or company policies that you know of or suspect, along with any other ethical concerns you may have.

How do I contact the Global Ethics and Compliance office to report a concern?

You may call the HelpLine at 1-800-443-6308 or email us directly at Ethics@IPaper.com.

What if English is not my first language?

If you submit a report through the HelpLine, whether by phone or online, translation resources are available to assist you in languages other than English.

Does management really expect me to report any violation – even a minor one?

Yes, they do. Large or small, we are committed to addressing ethical issues to stay true to our values and protect our integrity. In fact, your willingness to report a problem or concern provides an opportunity for the company to be better. Reporting a concern can minimize the potential negative impact on the company and our customers, as well as help alleviate a difficult situation for you. What's more, company policy requires all IP employees to speak up if they observe or suspect a violation of company policy or the law. That makes it our obligation. We should never wait for someone else to raise a concern for us.

I've seen some conduct that just doesn't seem right to me, but I'm not sure that it qualifies as a reportable violation. What should I do?

Go ahead and report your concern. It's better to report a situation that turns out to be harmless than to ignore possible unethical behavior. If you go through the HelpLine, a representative can help you with your initial report.

If I see a violation, shouldn't I just report it to my manager, security or HR and let them deal with it?

This can depend on the situation. When you observe some behavior that you believe violates our Code of Conduct, we expect you to report it. If you are faced with an ambiguous ethical situation on the job, ideally you should discuss your concerns with your direct manager or another member of our management team. However, there may be circumstances in which you are not comfortable reporting issues this way. This is what our reporting system is for. We would rather you report anonymously than keep your concerns to yourself.

If I submit a report, what's in it for me?

For one thing, you have an obligation under company policy to report violations to our policies or Code of Conduct. That obligation, however, is part of a bigger commitment to values that we uphold for the benefit of our common business and each other. We all have the right to work in a positive environment and to be treated with dignity and respect. With that right comes the responsibility to behave ethically and to let the appropriate people know when someone is violating or undermining the values embodied in our policies. By working together, we can maintain a healthy, encouraging and productive environment. Misconduct can injure individuals and threaten the livelihood of an entire company.

What if I remember something important to add to my report after I have filed it?

When you file a report, you will receive a number that uniquely identifies your case. You can then return to the system either on line or by phoning the HelpLine to add more details or provide further information that will help resolve open issues.

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.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café or at a friend's house) through the EthicsPoint secure website. Many people choose this option, as NAVEX 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 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 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 company promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the company and 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 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 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 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, 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.