

EthicsPoint reporting system - FAQs

What is EthicsPoint?

EthicsPoint is a comprehensive and anonymous Internet and telephone-based reporting tool that assists management and employees to work together to address fraud, abuse, misconduct and other violations in the workplace, while helping to cultivate a positive work environment.

Does management really want me to report?

Absolutely. Employees are encouraged to report information – on fraud, abuse and gross misconduct, i.e. criminal acts or serious breaches of fiduciary responsibility, within the company that they believe to be harmful to maintain a safe, secure and ethical workplace, without fear of reprisals from management. All reports or questions will be investigated and responded to appropriately and in strict confidence. Employees should be prepared to provide proof to back up their report. You may have initial knowledge of an activity that may be cause for concern. Reporting can minimize the potential negative impact on the company and its employees.

What type of situations should be reported?

Violations to report through EthicsPoint include:

- Accounting and auditing matters;
- Conflict of interest or violation of policy;
- Falsification of contracts, reports or records;
- Misconduct, harassment or inappropriate behavior;
- Theft, sabotage or vandalism;
- Unsafe working conditions;
- Violation or threat; and
- Other violations of our Code of Conduct.

I'm having a conflict with my manager or coworker. Should I report this to EthicsPoint?

No. Employees should continue to report employee relations issues, such as difficulties with a supervisor or coworker, dissatisfaction with the workload or scheduling matters and other similar concerns, through their manager or confidentially through their human resources representative.

Why has Livingston decided to use the EthicsPoint reporting system?

There are several reasons why a third-party reporting system is needed:

- To provide a secure reporting system where employees can file a confidential and anonymous report on accounting irregularities, incidents of discrimination or harassment, falsification of reports, safety concerns or any other violation of our Code of Conduct.
- To promote ethical conduct and cultivate a positive work environment.
- To take responsibility as a company and encourage feedback from employees at all levels.
- To work together to maintain a safe, secure and ethical workplace.
- To provide an open and effective communication channel that can be useful to help protect the company and its employees from losses due to fraud and abuse.

How is my confidentiality ensured?

- EthicsPoint does not generate or maintain any internal connection logs with IP addresses. No information linking an employee's PC to EthicsPoint is available.
- A report from home or any Internet portal remains secure and anonymous, the EthicsPoint system strips away Internet addresses so that anonymity is maintained.
- EthicsPoint is contractually committed not to pursue a reporter's identity and is designed to protect a reporter's anonymity.
- Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security.
- EthicsPoint makes the reports available only to specific individuals within the company who are charged with evaluating the type of violation and location of the incident.
- The EthicsPoint system and staff are trained and committed to ensure that no report is shared with implicated parties,
- You, as a reporter, also need to take care not to report information in a manner that may personally identify you, such as your relationship to the persons identified in the report or your physical location relative to the persons or incidents in the report.

Is the telephone hotline confidential and anonymous too?

Yes. Security and confidentiality measures are applied to both Internet and telephone-based reports. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will enter your responses into a report on your behalf.

Are follow-up reports as secure as the initial report?

All EthicsPoint correspondence is held in the same strict confidence as the first report, continuing under the same umbrella of anonymity.

Can I choose to be identified in my report?

There is a section in the report to identify yourself, only if you wish.

Should I report individuals involved in unethical conduct, even if it doesn't affect me?

Livingston promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and coworkers to report it. By working together we can maintain a healthy and productive environment.

I am not sure what I have observed or heard is a violation of company policy, or involve unethical conduct, but it doesn't seem right to me. Should it be reported?

Yes, file a report. EthicsPoint can help you prepare and file your report so it can be properly understood. It is better to report a situation that turned out to be harmless than let possible unethical behavior go unchecked because of uncertainty.

How do I file a report?

What should I do after I've filed a report? Can information be added after the initial report?

Reports filed through EthicsPoint will be addressed within five to six business days. Check periodically, by accessing EthicsPoint through their web site or toll-free number, to see if there are any follow-up questions or requests regarding your report. Use the report key and password initiated when the original report was filed to review report details, respond to questions and add any other information that will help resolve open issues. You can and should return regularly to review your report until the matter is closed.