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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a supplemental, comprehensive reporting tool that enables individuals to ask questions or raise concerns about our organization and business conduct. The EthicsPoint tool was created by a third-party organization, NAVEX. Tarsus has partnered with NAVEX to make this tool available to help foster an environment of integrity, open communication, and trust.

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 report via either the telephone or the Internet, twenty-four hours a day, seven days a week, by calling (833) 224-2950 or visiting tarsus.ethicspoint.com.

What types of situations should I report?

The EthicsPoint system allows employees to ask questions and raise concerns about business conduct, the Code of Conduct, policies and procedures, and more.

If I see a potential violation of the Code of Conduct or other Tarsus policy and procedure, shouldn't I just raise it to my manager or human resources and let them deal with it?

All Tarsans have the responsibility to report concerns about potential misconduct. You may report such concerns to your Supervisor, Senior Management, the Compliance Department, the Human Resources Department, or the General Counsel. We have also made the EthicsPoint Helpline available to you as another way to ask questions or raise potential concerns.

If you use the EthicsPoint Helpline you will have the opportunity to identify yourself or remain anonymous. If you identify yourself, confidentiality will be maintained to the fullest extent possible.

Tarsus has a strict non-retaliation policy and does not tolerate retaliation against anyone who in good faith asks a question or raises a concern.

Why should I report what I know? What's in it for me?

Tarsus is committed to fostering an environment of integrity, open communications, and trust. We all have the right to work in such a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone may not be acting appropriately. By working together, we can maintain a healthy and productive environment. And, corporate misconduct can create significant risks for the entire company.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our company –both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input or asking questions 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 Tarsus who are charged with evaluating and investigating each report, based on the type of potential violation and location of the incident. Each report will be treated confidentially to the fullest extent possible.

What information should I include in the report?

All reports should include as much detail as possible, as it is often difficult to investigate generalized concerns. Such details should include a description of the conduct involved and the names of individuals related to the incident.

I am not an employee – may I use EthicsPoint to ask a question or raise a concern?

Yes, the EthicsPoint Helpline can be used by vendors, customers or patients.

Isn't this system just an example of someone watching over me?

No. The EthicsPoint Helpline is a positive aspect of our overall philosophy and commitment to integrity. You are encouraged to seek guidance on ethical dilemmas, provide positive 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 the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting - 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 and a commitment to acting with integrity. 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 potential misconduct or ethical violations, you are expected to raise 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. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unaddressed.

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.

What if I lose my Report Key or forget the Password I created?

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 Helpline at (833)-224-2950, which is available 24 hours a day, 365 days a year.