

[About the Xerox Ethics Helpline](#)

[Reporting – General](#)

[Reporting Security & Confidentiality](#)

[Tips & Best Practices](#)

About the Xerox Ethics Helpline

What is the Xerox Ethics Helpline?

The Xerox Ethics Helpline is a comprehensive and confidential reporting tool operated and managed on the Ethics Point secure server by our independent, third-party vendor NAVEX. The tool provides Xerox employees and others with a channel to:

- Speak up – confidentially or anonymously if preferred (and allowed by local law) – with questions or concerns about ethics and compliance concerns, including, but not limited to, known or potential fraud or abuse or other misconduct that may violate the Xerox Code of Business Conduct (“Code”), Company policies, or the law.
- Seek guidance concerning ethical dilemmas and the application of the Xerox Code and policies to business and workplace situations.

Why do we need a system like the Xerox Ethics Helpline?

- By creating open channels of communication, we promote a culture of integrity and compliance, contributes to a positive work environment, and maximize productivity.
- An effective reporting system augments our other efforts to foster a culture of integrity and compliance.
- Reporting is a benefit to Xerox because it affords the Company an opportunity to conduct full and thorough investigations into reported matters and then take appropriate actions in response to investigative findings.
- Xerox is unable to address suspected violations of the Xerox Code, policies, and the law if it does not know about them. Concerns that go unaddressed can fester and become more severe. Unaddressed questions, issues, and concerns can reduce morale and productivity, and may also lead to reputational, financial, and legal risks for Xerox.

Reporting – General

How may I file a report?

With the Xerox Ethics Helpline, you can file a confidential, anonymous report via either the telephone or the Internet.

What types of situations should I report?

The Xerox Ethics Helpline is designed for individuals to report any known or potential violation of our Code of Business Conduct, Company policies or procedures, the law, or any other concern you may have. You do not need to be absolutely certain there has been a violation. Rather, we encourage reporting even potential violations so that we can look into the concern and try to address issues before they escalate. The only requirement is that you act in good faith. This does not mean you have to have full knowledge of the facts and be right about what you are reporting; it simply means you must have an honest belief and are acting in the best interests of Xerox.

Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

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

When you observe some behavior that you believe violates our Code of Business Conduct, we expect you to report it. Xerox provides a variety of channels for employees to receive guidance regarding ethics and compliance issues and suspected violations. Any concerns may be raised with your direct manager or other member of our management team. We recognize, however, that there may be circumstances when you are more comfortable reporting your concerns directly to the Xerox Ethics Helpline. The Helpline is an efficient and confidential reporting mechanism, which accept anonymous reports (where permitted by law) of allegations of a breach of the Xerox Code of Business Conduct, Company policies, suspected or actual misconduct, or the law. It is for such circumstances that we have partnered with NAVEX.

Will I suffer any negative consequences if I report a concern?

Any form of retaliation against any employee for reporting or participating in the investigation of a suspected violation will not be tolerated. Individuals who take action against a person for making a report in good faith or participating in an investigation in good faith will be subject to disciplinary action, up to and including termination, as local law permits. If you believe you are experiencing retaliation, you must contact the Xerox Ethics Helpline immediately.

Where do these reports go? Who can access them?

Reports are entered directly on Ethics Point's secure server. NAVEX makes these reports available only to members of the Xerox Business Ethics & Compliance Office 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. Matters are then either assigned or referred to the appropriate resource for investigation or follow-up in accordance with Xerox policy. Reports are only shared on a need-to-know basis and in accordance with applicable law.

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 the Xerox Ethics Helpline 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 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 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 system strips away Internet addresses so that anonymity is totally maintained.

I am concerned that the information I provide the Xerox Ethics Helpline will ultimately reveal my identity. How can you assure me that will not happen?

The 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 Xerox Ethics Helpline 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?

Our vendor's system and report distribution protocols 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 with the Xerox Ethics Helpline, whether via the web reporting tool or through the Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the 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 Xerox Ethics Helpline 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 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 Xerox Ethics Helpline toll-free phone number, which is available 24 hours a day, 365 days a year.