
Common Questions and Answers for Employees

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ABOUT EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool to assist management and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- The Bank believes that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- An effective reporting system will augment 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. With EthicsPoint, you have the ability to file a report via either the telephone or the Internet. You can also report internally via mail or direct conversations.

What type of situations should I report?

The EthicsPoint system is designed for employees to report violations of the Group's Code of Conduct, or regulatory obligations.

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

Ideally, you should bring any concerns forward to your direct manager or other management team members. The Bank recognizes, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances The Bank implemented EthicsPoint.

Where do these reports go? Who can access them?

Reports are entered directly to a EthicsPoint secure server to prevent any possible breach in security. These reports available to specific individuals within the Bank who are charged with collecting, handling and evaluating the report, based on the type of violation and location of the incident.

REPORTING SECURITY & CONFIDENTIALITY

It is my understanding that any report I send from a company computer generates a server log that shows every website my PC connects with; won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses; no information linking your PC to EthicsPoint is available. In fact, it is contractually committed not to pursue a reporter's identity.

Can I file a report from home and still remain anonymous?

A report from home, or any Internet portal will remain secure and anonymous, where permitted by local laws. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away identifying information, such as an IP address, so that anonymity is maintained. Plus, it is contractually committed not to pursue a reporter's identity.

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

The EthicsPoint system is designed to protect you. In fact, we are contractually committed not to pursue a reporter's identity. To further ensure your anonymity, you - as a reporting party - need to be careful not to reveal any identifying details as part of your report.

Is the telephone toll-free hotline confidential and anonymous too?

Yes – so long as anonymous reporting is permitted by local laws. You will be asked to provide the same information you would provide in an Internet-based report; the interviewer will type your responses directly into EthicsPoint's secure environment. Hotline-based reports have the same security and confidentiality measures applied to them during delivery as Internet-based reports.

What if I want to be identified with my report?

There is a section in the report where you may identify yourself, if you wish.

TIPS & BEST PRACTICES

What if I remember something important about the incident after I file the report?

When you file a report, either using the Internet or through EthicsPoint's Contact Center, you receive a unique report key and are asked to select a password. With the report key and your password, you can return to the EthicsPoint system again, either by Internet or telephone, and access the original report. At that point, you can add more details.

What if the Bank has questions for me concerning my report?

EthicsPoint provides functionality that enables the Bank's representatives to post questions for you, even if you report anonymously. When you receive your report key, you will be provided with the amount of time we expect for the report to be processed. When that time has passed, we strongly suggest you check to see if any questions have been posted. Providing the opportunity for such dialogue means situations may not only be identified but can also be resolved.

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, if you so choose (and where permitted by local laws).

What should I do if the country I am in is not listed above?

If there is no service for your location, please make your report online through this web site. Please indicate in the report that dialing instructions for the country you are located in were not available.