About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist managers and employees with concerns and issues in the workplace.

Why do we need a system like EthicsPoint?

- Employees are at the heart of what we do. We realize employees need multiple ways to communicate with us, and we want to hear from you.

- EthicsPoint provides a way for employees to communicate with us anonymously, through a third-party system

- The EthicsPoint system helps us foster a culture of honesty and integrity, and hold us accountable to ethical and compliant business practices.

Reporting – General

May I report using either the internet or a phone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report online or on the phone.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of policy, procedure, or law, or any other concern you may have.

If I see a violation, shouldn't I report it to my manager or someone on the human resources team?

When you observe behavior that you believe violates law, policy or our How We Work Together commitments, we expect you to report it. Ideally, you should bring any concerns to your direct manager, someone on the human resources team, or another member of our management team. We recognize, however, that there may be situations where you are not comfortable reporting in this manner. That's why we've partnered with EthicsPoint. We'd rather you report anonymously than keep the information to yourself.

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

We all have the right to work in a positive environment. With that right comes the ethical responsibility to let us know if someone is not acting appropriately. Misconduct can threaten the livelihood of an entire organization. By working together, we can maintain a healthy and productive culture.

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 organization - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can <u>minimize</u> the potential negative impact on the organization and your co-workers. Also, offering positive input may help identify ways we can improve culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the organization who are charged with evaluating the report, based on the type of violation and the persons involved. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Is this system an example of someone watching over me?

The EthicsPoint system is an anonymous communication tool to help us ensure a safe, secure, and ethical workplace.

Reporting Security & Confidentiality

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

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

If you feel uncomfortable making a report on your work computer, you have the option of using a computer outside our work environment (like the library or a friend's house) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's 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 computer connected to the internet 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. EthicsPoint is contractually committed not to pursue a reporter's identity.

I am still concerned that 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 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 toll-free hotline confidential and anonymous, too?

Yes. You will be asked to provide the same information that you would provide in an online report and an interviewer will type your responses into the EthicsPoint website. 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 for identifying yourself, if you wish.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Relay promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the organization and all employees, including you. You may have seen on the news where other organizations have encountered scandals that resulted in disastrous effects, all from a seemingly harmless ethical lapse in an otherwise healthy company. So, if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

I'm not sure if what I have observed or heard is a violation of policy, or involves unethical conduct, but it just doesn't seem right to me. What should I do?

File a report. EthicsPoint 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 to let possible unethical behavior go unchecked.

What if my boss or other managers are involved in a violation?

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named. If your report involves your manager, your manager will not have access to your report.

What if I remember something important about the incident after I file the report? Or what if the organization 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 report key and are asked to choose a password. You can return to the EthicsPoint system again online or by phone and access the original report to add more detail or answer questions.. We strongly suggest that you return to the site in the time specified to answer any follow-up questions. At that point, you and Relay will 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 interactions are held in the same strict confidence as the initial report. If you filed the first report anonymously, then all following interactions will continue in the same way.

Can I still file a report if I don't have access to the internet?

If you don't have access to the internet 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.