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## About NAVEX - EthicsPoint

### What is NAVEX - EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX to assist management, collaborators and other stakeholders to work together in addressing fraud, abuse, and other misconduct, all while cultivating a positive business environment.

### Why do we need a system like EthicsPoint?

- **Nauterra** has zero tolerance for behaviour that diverges from the principles and values included in our Code of Business Ethics.
- We believe that by creating open confidential channels of communication, we can promote a positive business 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 confidential report via either the [Internet](#) or the [telephone](#) toll-free lines. You may also use a [QR code](#).

## What type of situations should I report?

The EthicsPoint system is designed for employees or other stakeholders to report any violation of our stated [Code of Business Ethics](#), or other ethical concern you may have.

## 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 company who are in charge of evaluating the report. Each of these report recipients has had training in keeping these reports in the utmost confidence.

For further information, please refer to our [Policy on the Whistle-blowing channel](#).

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

When you observe some behavior that you believe violates our [Code of Business Ethics](#), we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report confidentially 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 business environment and with that right comes the responsibility of acting in an ethical manner and letting the Ethics Committee know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

### Does management really want me to report?

We certainly do. In fact, *we need you to report*. 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 stakeholders.

## 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, and 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 PC to EthicsPoint 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, at a friend's house, etc.) 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.

You may also choose to place the report by using the [telephone toll-free lines](#).

### Is the telephone toll-free hot line confidential 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 EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

## 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?**

Nauterra chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company, all employees and even other stakeholders. 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 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. 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 let possible unethical behavior go unchecked because you weren't sure.

**If I report a possible violation, will I have any problems if my concern ends up being unfounded?**

If you act in good faith and have justified suspicions indicating that an infraction has occurred, you will not suffer any reprisals or be subject to disciplinary measures, even if the report is ultimately dismissed. If you are aware of an infringement of the Code and have solid reasons for suspecting that a violation has occurred, you have the duty to report this fact immediately.

**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 are designed so that implicated parties are not notified. Reports are handled confidentially.

**What if my boss or other managers find out it was me reporting? They can use it against me.**

As long as you act in good faith, the reporting procedure guarantees that there shall be no reprisals or adverse consequences for the person placing the report. Remember it is your duty to report possible incidents of misconduct or ethical violations.

### 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 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 posted by **those authorized to access the channel** and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the specific individuals within the company who are in charge of evaluating the report, now have entered into “a 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 correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of confidentiality and non-reprisal.

### 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. If you don't have access to 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.