

## About EthicsPoint

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# About EthicsPoint

## What is EthicsPoint?

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

## Why does RPS need a system like EthicsPoint?

- Open channels of communication, particularly where there are sensitive issues that need raising promote a positive work environment, maximise productivity and reduce risk.
- There may be occasions when you would prefer to place an anonymous report, in confidence. That is why we have made it easy to make a report using a dedicated, independent, whistleblowing hotline
- We set high standards for ourselves and our commitment to upholding those standards is clear. The provision of a whistleblowing line strengthens our efforts to foster a culture of integrity and ethical decision-making
- Publicly traded companies (i.e. businesses with shareholders) are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.

# Reporting – general

## How do I file a report?

With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

## What type of situations should I report?

If reporting via other channels has not been successful or is too hard to do, use EthicsPoint to report issues that are in the public interest. This means it must affect others, for example the public.

Examples include:

- Criminal offence e.g. fraud
- If someone's health and safety is in danger

- Risk or actual damage to the environment
- A miscarriage of justice
- Company is breaking the law (e.g. not having right insurance)
- You believe someone is covering up wrongdoing

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

When you observe something or some behaviour that you believe violates our expected conduct, we need and expect you to report it. Ideally, you should bring any concerns forward to your line manager, or another member of your local management team. We recognise, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. If this is the case, we would rather you report anonymously via EthicsPoint rather than keep the information to yourself.

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

It is good practice. We set high standards for ourselves and our commitment to upholding those standards is clear. Under no circumstances is it acceptable, nor is it ever expected, to compromise our policies or standards.

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment and reduce the risk of corporate misconduct which can threaten the reputation and livelihood of a company.

## **Does management really want me to report?**

We certainly do. Where possible we would like you to do that through conversation and internal procedure. However, if that isn't practical then we need you to report through EthicsPoint. You know what is going on in RPS - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimise the potential negative impact on our people, clients, investors and communities. It can also protect us in the future by identifying issues that can improve corporate culture and performance.

## **Where do these reports go? Who can access them?**

To ensure confidentiality and security of the information, reports are entered directly on the EthicsPoint secure server. EthicsPoint makes these reports available only to specific individuals within the company 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.

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

EthicsPoint is a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace. It is not about creating a 'big brother /surveillance' environment.

Within RPS 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 that allows us to meet our compliance obligations while maintaining a positive reporting environment.

## **Reporting security and 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. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

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.

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

A report from home, a neighbour's computer, or any Internet portal 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. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

## **I am 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 desk next to Jan Smith..." or "In my 33 years...".

## **Is the free telephone 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 EthicsPoint 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 for identifying yourself, if you wish.

## **Tips and best practices**

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

RPS chooses to promote ethical behaviour. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. Publicised corporate scandals show how, a seemingly harmless lapse in ethics can have a disastrous effect on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your colleagues to report it.

## **I am not sure if what I have observed or heard is a violation of RPS 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 behaviour go unchecked because you weren't sure.

## **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 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 RPS 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 username 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 an RPS representative 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 questions. You and RPS 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 EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

## **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 free hotline, which is available 24 hours a day, 365 days a year.