

[About EthicsPoint](#)

[Reporting – General](#)

[Reporting Security & Confidentiality](#)

[Tips & Best Practices](#)

About EthicsPoint, Oxford University Press' Speak Up channel

What is EthicsPoint?

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

Why do we need a system like EthicsPoint?


- We believe that our employees are our most important asset. By creating open channels of communication, we can promote an ethical work environment.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- 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, anonymous report via either the telephone or the Internet.

What type of concerns should I report?

You must raise any suspicions or concerns that our  **Code of Conduct**, or the policies that **underpin it**, are being violated, including:

- Fraud, bribery, theft and other financial malpractice
- Conflicts of interest
- Bullying
- All forms of discrimination (racial, religious, age, gender, sexual orientation, gender reassignment and mental health)
- Sexual Harassment
- Victimisation
- Danger to the health and safety of individuals
- Dangers to the environment
- Piracy
- Other misconduct which is reportable to the police or external regulators

When should I report? Do I need to have evidence?

Please report as soon as possible, when you have reasonable grounds to believe any of the above is happening. You do not need to have proof or all the evidence. Early reporting helps to ensure that the facts can be established more successfully. Please do not look into the matter yourself, as you could compromise an investigation.

Why should I report?

Speaking Up is key to fostering an ethical culture and preserving Oxford University Press' reputation, and assists in preventing, detecting, investigating and deterring ethical misconduct. Staff members have a duty to report promptly matters that potentially fall short of Oxford University Press' Code of Conduct and supporting policies, whether they relate to Oxford University Press, its staff, or its business partners.

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 Oxford University Press' Investigations Team who are

responsible for evaluating the report, based on the type of violation and location of the incident. The Investigations Team is committed to treating all reports confidentially.

Who will investigate my concern?

An appropriate specialist within Oxford University Press will look into your concerns. Depending on the nature of the concern raised, the specialist may be a member of The Investigations Team, HR, Ethics and Compliance, ISDP or another department.

What does an investigation involve?

An investigation is a fact-finding exercise. An investigation may involve gathering documentary or digital evidence and speaking with persons who have knowledge and information of the concerns.

Those tasked with investigations will ensure that the process is confidential, objective, fair, evidence led and proportionate. They will also rely on your commitment to maintaining confidentiality. It is therefore very important that you do not discuss your concerns with others.

Will I be informed of the outcome of my report?

You will usually be informed that your concern has been looked into. You would not normally be entitled to updates or informed of the outcome, unless it is appropriate for you to know.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every web-site 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.

Can I file a report from home and still 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 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 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 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 & Best Practices

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.

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 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 user name 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 a company 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 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 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 freephone hotline, which is available 24 hours a day, 365 days a year.