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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global that enables management and employees to work together to address fraud, abuse, and other misconduct in the workplace while cultivating a positive work environment. NAVEX Global is an independent third party that is not affiliated with Pricefx.

Why do we need a system like EthicsPoint?

An effective reporting system augments our commitment to fairness. We cannot further this commitment if we are not made aware of issues and given an opportunity to address them.

We hope that EthicsPoint will provide a meaningful reporting channel where employees, contractors, or other stakeholders are not comfortable reporting ethics or compliance issues directly to their managers or other points of contact within Pricefx.

Reporting – General

May I report using either the Internet or the telephone?

Yes. EthicsPoint enables you to file a confidential report via either the telephone or the Internet. You may choose to do so anonymously or may identify yourself as the reporter. This choice applies regardless of the way you report.

What types of situations should I report?

The EthicsPoint system allows employees, contractors, and other stakeholders to report any known or suspected violation of applicable policies (including the Pricefx Code of Conduct), standards, contracts, or laws. You may also use EthicsPoint if you are looking for advice on how to handle a tricky ethics or compliance-related situation.

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

When you observe some behavior that you believe violates an applicable policy, standard, contract, or law, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or a 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 NAVEX Global to provide this hotline.

Why should I report what I know?

As stated above and in our Code of Conduct, to help maintain a fair environment, we need our people to be transparent and forthcoming. We all have the right to work in a fair, positive environment and with that right comes the responsibility to act ethically and to let the appropriate people know if someone is not doing so. By working together and bringing issues forward, we can maintain a safe, healthy, and productive environment.

Does management really want me to report?

We certainly do. You know what is going on in our company - both good and bad. That knowledge is critical to our maintaining an effective compliance program: Your report may prevent a violation from occurring; it can help us minimize the potential negative impact on the company and our people; and it can lead to changes that prevent similar issues in the future.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. NAVEX Global makes these reports available (on an anonymous basis if desired by the person reporting) only to specific,

limited individuals within our company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these designated recipients have been trained to keep these reports in the utmost confidence, though they may have to disclose certain aspects of the report to others where necessary to investigate or remediate the applicable issue. If you would like more detail on what happens to reports once they are submitted (through EthicsPoint or otherwise), contact legal@pricefx.com or see the applicable information on the Legal, Risk, and Compliance Confluence pages.

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. Won't this log identify me as the report originator?

NAVEX Global 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 or at a friend's house) 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.

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 protects 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 33.25 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 to identify yourself, if you wish. While this isn't required, we do encourage it, as it can improve our ability to investigate issues fully and fairly.

Tips & Best Practices

I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?

Our company promotes fair and ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all of its stakeholders, whether employees or not. There is no shortage of recent corporate scandals to demonstrate the disastrous effects that a lapse in ethics and compliance can have on an otherwise healthy company. If you know of any incidents of misconduct or ethical or compliance 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?

First, consider talking to your manager or a member of company management about the situation. Otherwise, you should likely file a report. NAVEX Global can help you prepare and file your report so it can be properly understood. So long as you have a reasonable belief that something could be off, we'd rather you report a situation that turns out to be harmless than let possible unethical or illegal behavior go unchecked.

Keep in mind, though, that Pricefx will not tolerate abuse of the hotline, including filing false reports. We expect stakeholders to use this hotline responsibly and will take appropriate action where it is being used improperly.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

Reports filed through EthicsPoint by default go to a limited, pre-determined number of people within Pricefx. However, the EthicsPoint system and report distribution ensure 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, randomized number called a "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 posed by a company representative. 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.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

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 toll-free hotline, which is available 24 hours a day, 365 days a year.