

[About EthicsPoint](#)

[Reporting – General](#)

[Reporting Security & Confidentiality](#)

[Tips & Best Practices](#)

About EthicsPoint

What is EthicsPoint?

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

Why do we need a system like EthicsPoint?

- Our employees are our most important asset. By creating open channels of communication, we promote a positive work environment and maximize productivity.
- An effective reporting system augments 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. EthicsPoint enables you to file a report via either the telephone or the Internet. This can be confidential and anonymous if you choose.

What types of situations should I report?

The EthicsPoint system allows employees to report any whistleblowing disclosures described in BII's [Whistleblowing Policy](#).

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

If you observe behaviour that you believe constitutes serious malpractice, misconduct, or any breach of laws or regulations that could adversely impact BII or the public interest, we encourage you to report it through BII's external reporting mechanism in accordance with BII's [Whistleblowing Policy](#).

We recognise, however, that you may wish your disclosure to remain anonymous; it is for such circumstances that we have partnered with NAVEX. We would rather you report anonymously than keep the information to yourself.

Why should I make a report?

BII is committed to integrity and ethical behaviour. To uphold this, we strongly encourage Employees to voice any concerns or suspicions about serious malpractice, misconduct, or any breach of laws or regulations that could adversely impact BII or the public interest. We all have the right to work in a climate of openness, and with that right comes the responsibility of acting in an ethical manner and letting the right people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment.

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 company - both good and bad. 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 people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Is there anything I should avoid reporting?

This reporting process is not for Employees to complain about their own circumstances, including their treatment at work. Complaints of this nature should be raised via BII's grievance or harassment procedure as set out in the Staff Handbook. If an Employee is unsure about the right course, they can ask Compliance or the Chief People Officer, who will provide guidance. You can also use **BII's Employee Navigation Map** to determine the most appropriate channel through which your concerns should be raised.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. NAVEX makes these reports available only to specific individuals within the Compliance team who are charged with evaluating the report. Each of these report recipients has had training in keeping these reports confidential.

BII is committed to ensuring that all disclosures and concerns are handled appropriately, consistently, fairly and professionally.

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 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. Many people choose this option, as NAVEX'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 from BII. Our 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 years...".

Is the 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 to identify yourself, if you wish.

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 ethical behaviour. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy company. 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 company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. NAVEX 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.

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 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 Centre, you receive a unique, randomised 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, continuing under the umbrella of anonymity.

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