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## About EthicsPoint

### **What is EthicsPoint?**

EthicsPoint is a comprehensive and confidential reporting tool created and managed by an independent company, NAVEX, that enables anyone to report issues or concerns and for The crown Estate to manage and appropriately follow up any reports received.

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

The Crown Estate is committed to conducting its business with honesty and integrity. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal, inappropriate or unethical conduct.

A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The EthicsPoint system provides another way to report your concerns, including an ability to report anonymously, with the knowledge that it will be listened to and acted upon.

# Reporting – General

## **May I report using either the Internet or the telephone?**

Yes. EthicsPoint enables you to file a confidential, anonymous report via either the telephone or the Internet.

## **What types of situations should I report?**

The EthicsPoint system allows employees to report any violation of our Code of Business Ethics, our policies or procedures, or other concern you may have.

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

We would encourage reporting of any issues or concerns as this allows us to address those concerns and potentially prevent further issues. Ideally, you should feel comfortable raising your concerns with your line manager or specific functions like the People Team. However, we recognize 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. We would rather you report anonymously than keep the information to yourself.

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

What we walk by is what we accept. By reporting you can help ensure issues are addressed and we can prevent similar issues in the future. Don't assume that someone else will have reported it even if you know others may have witnessed the same issue. You raising an issue may not only prevent harm or injury to another person but also to The crown Estate as a whole.

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

The simple answer is 'Yes'. 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.

## **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 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. Your report will then be directed to the most appropriate process for follow up. Please be assured confidentiality, and if requested, your anonymity will be respected. The system also has built in safeguards so that a person named can not access or see that particular report.

# Reporting Security & Confidentiality

## **If I access EthicsPoint will the company be able to track me or identify me?**

NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking your work laptop or phone to EthicsPoint is available.

## **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 unintentionally reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...". However, the more details of the issue we receive, the easier it is to follow up effectively and therefore resolve the issue. The team within The Crown Estate will also ensure they respect your wishes around anonymity.

## **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?**

You do not have to be anonymous. Follow up of reports is often easier when you do identify yourself. The more information we have, the easier our job is in investigating. However, please be assured even if you do identify yourself we will respect confidentiality and we do have a zero tolerance policy to any retaliation.

## Tips & Best Practices

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

What we walk about, we accept. What if you were the one affected, how would you feel if someone walked by and did nothing. All inappropriate or unethical conduct, at any level, ultimately hurts us all. We understand speaking up takes courage but remember you can help prevent such issues.

### **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?**

If in doubt report. It is easy and simple to do. No individual will suffer any direct or indirect punishment, retribution or detriment (including, but not limited to, intimidation, harassment, dismissal, demotion, suspension, reduction in wages) as a result of reporting concerns in good faith. We'd rather you report a situation that turns out to be harmless than let something bad 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 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 any questions we may have. Your anonymity will still be protected unless and until you agree otherwise.

### **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. 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 or just scan the QR code.