

NAVEX Global: EthicsPoint Reporting Hotline

NAVEX Global provides more employee hotlines—and more advanced incident reporting methods—than any other vendor in the world. We were the first to offer an employee hotline and the first to integrate telephony and web-based report capture. Today, our hotline product family is trusted by thousands of organizations around the world.

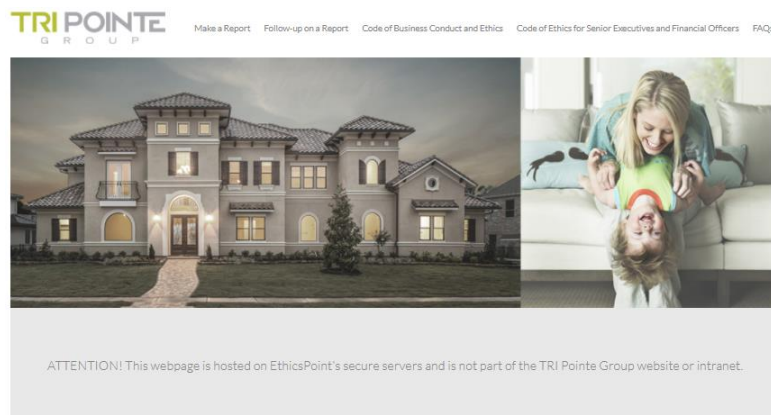
NAVEX Global's Hotline Reporting helps employees, customers, suppliers and other stakeholders quickly and easily report potential ethics and compliance issues. Our hotline also provides you with the E&C data you need to improve your program and take corrective action.

Reporting Hotline:

- Largest and most responsive service in the world, open 24/7/365
- Only provider with In-House Call Centers and dedicated lines to provide security and efficiency
- NG's hotline call center professionals are college educated and must pass rigorous typing and grammar tests before 120 hours of extensive training in ethics and compliance
- U.S Based Data Servers protect private information in line with federal privacy laws
- Our communication specialists speak a collective 200+ languages

Web Intake Site:

- An additional method for employees to report, should they feel more comfortable online
- Custom site developed to provide the look and feel of your organization
- Ability to configure site and add relevant resources (IE code of conduct & policies)
- Below is an example of a landing page, you can link them to your website or internal intranet site:



OUR COMMITMENT

TRI Pointe Group is an organization with strong values of responsibility and integrity. Our written standards and policies contain general guidelines for conducting business with the highest standards of ethics.

TRI Pointe is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or management in instances where you believe violations of policies or standards have occurred.

In situations where you prefer to place an anonymous report, you are encouraged to use this hotline, hosted by a third party hotline provider, EthicsPoint. You are encouraged to submit reports relating to violations stated in our written standards and policies, as well as asking for guidance related to policies and procedure and providing positive suggestions and stories.

The information you provide will be sent to us by EthicsPoint on an anonymous basis if you should choose. You have our guarantee that your comments will be heard.

See the [EthicsPoint FAQs](#) for more information.

ETHICSPPOINT IS NOT A 911 OR EMERGENCY SERVICE:

Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

TO MAKE A REPORT

You may use either of the following two methods to submit a report:

- Select the "Make a Report" link at the top of this web page.

OR

- Dial toll-free, within the United States, Guam, Puerto Rico and Canada: 844-227-1794

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After 5-6 business days, use your report key and password to check your report for feedback or questions.

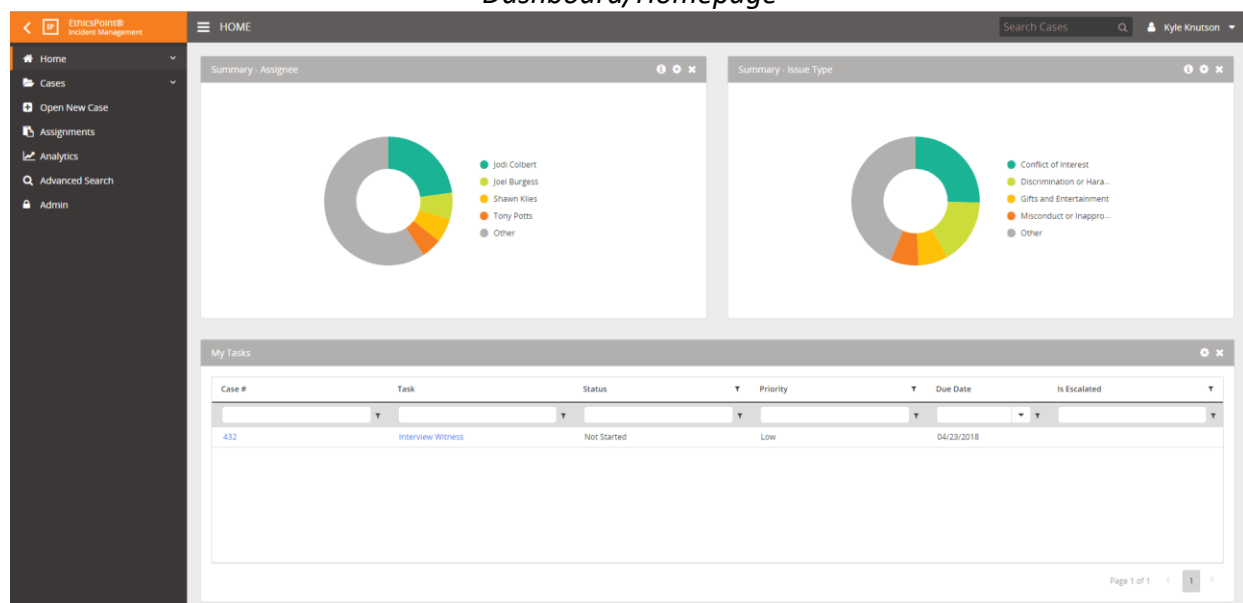
You are currently in the confidential and secure reporting structure of EthicsPoint. Below are the choices available to you. Please click on the arrow (→) to select the type of report you would like to make.

Children's Bureau of Southern California	
Accounting and Auditing Matters	The unethical systematic recording and analysis of the business and financial transactions associated with generally accepted accounting practices. (Examples include: misstatement of revenues, misstatement of expenses, misstatement of assets, misapplications of GAAP principles, wrongful transactions.)
Conflict of Interest	A conflict of interest is defined as a situation in which a person, such as a public official, an employee, or a professional, has a private or personal interest sufficient to appear to influence the objective exercise of his or her official duties. (Examples include: inappropriate vendor relations, bribery, misuse of confidential information, inappropriate customer relations)
Disclosure of Confidential Information	Unauthorized and unlawful disclosure of corporately owned intellectual property or trade secrets, as well as employee, customer or consumer information, marketing and other corporate data bases, marketing plans, business proposals and strategies.
Discrimination or Harassment	Uninvited and unwelcome verbal or physical conduct directed at an employee because of his or her sex, religion, ethnicity, or beliefs. (Examples include: bias in hiring, bias in assignments, wrongful termination, bias in promotions, bias in educational decisions, unfair compensation, inappropriate language).
Donor Stewardship	Funds directed to the organization have not been handled with the utmost truthfulness or not used in accordance with the donor's intentions and wishes. Failure to provide due care with respect to the donor, and/or donation. Injury to the public trust.
Falsification of Contracts, Reports or Records	Falsification of records consists of altering, fabricating, falsifying, or forging all or any part of a document, contract or record for the purpose of gaining an advantage, or misrepresenting the value of the document, contract or record.
Misconduct or Inappropriate Behavior	Intentional wrongdoing; specifically: deliberate violation of a law or standard.
Safety	Failure of meeting requirements needed to perform all duties in a secure environment. Potential areas of harm. (Examples include: environmental damage, OSHA, EPA, supervisor directive, poor housekeeping). Violence is an expression of the intention to inflict evil, injury, or damage to a person or their property. (Examples include: direct, veiled, conditional, violent)
Theft	The act of stealing; specifically: the felonious taking and removing of personal property with intent to deprive the rightful owner of it.
Violation of Policy	Willful or innocent actions that are in direct violation of company policy, procedures, code of conduct, and/or implied contractual responsibilities. (Examples include: non-disclosure agreements, hiring standards, safety, Internet usage, corporate guidelines)
Other	If you feel that the definitions above do not describe the event, action or situation you are looking to report about, please use this header.

Incident Management System:

- NAVEX Global's largest differentiator
- Centralized repository for you to store, manage, and learn from the data you have
- Configurable to provide access or limit individuals access to specific cases or type of reports
- Ability to interact with reporter, even if they report anonymously
- Powerful analytics to learn from information

Dashboard/Hompage



Case

★ Case 113-Discrimination or Harassment

Opened: 9/16/2014 Days open: 1255 Last modified: 2/21/2018 Intake method: Hotline Web Status: In Process Alert Status: Red Escalated Status: Yes

General Case Info

Case number: **113**

Received/Reported date: 9/16/2014

Alleged incident date: 9/9/2014

Language: English

Assigned tier: Human Resources

Issue:

Primary issue: Discrimination or Harassment

Secondary issue 1: Securities Violations

Summary: Their summary for this case

Case Details

Reported tier information

Case type: Allegation

Intake method: Hotline Web

Location

Organization/Building name: EP Golden Demo DB 01

Location name: InCo China

Location/Address: 14345 S InCo Way

City: Beijing

Country: Mainland China

Business Unit: InCo China

Region: Asia & Middle East

Country: Mainland China

Field Location? Yes

Location#: Region1

Reporter contact information

Reporter anonymous: Yes

Case information

Step 1.

What is your relationship: Former Employee

Please identify the person(s) engaged in this behavior: Mary O'Sullivan - Director
Brianna Woodworth

Do you suspect or know that a supervisor or management is involved? Yes

If yes, then who? Mary O'Sullivan, Director

Is management aware of this problem? Do Not Know

What is the general nature of this matter? Mrs. O'Sullivan is on the committee to select the subcontractor for our new office build out, but her husband owns one of the companies in the running for this contract.

Where did this incident or violation occur? I overheard the committee discussing the potential subcontractors as they exited the conference room on the 2nd floor.

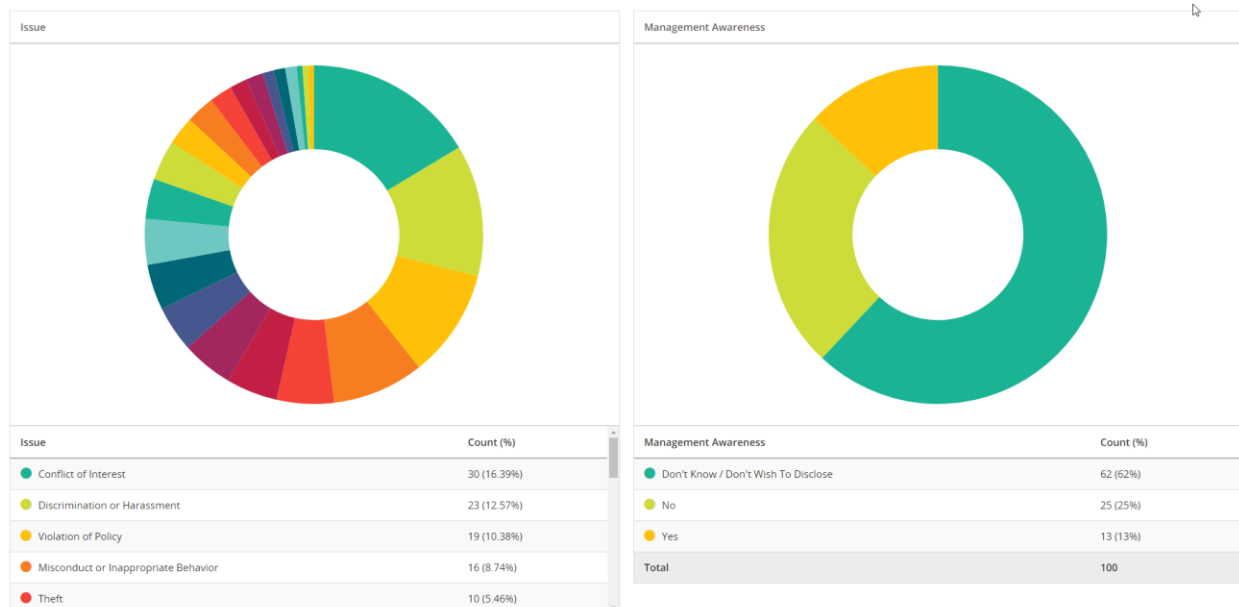
Please provide the specific or approximate time this incident occurred: About two weeks ago, but the committee is still deliberating over the contracts

How long do you think this problem has been going on? 1 to 3 months

How did you become aware of this violation? I heard it

Please identify any persons who have attempted to conceal this problem and the steps they took to conceal it: I brought it to Mrs. O'Sullivan's attention, but she just laughed at me, and told me to keep my nose out of managerial business.

Reports/Analytics



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www.navexglobal.com

WHY NAVEX Global?

- The Leader in the Ethics and Compliance Space with multiple solutions as your compliance program grows
- Largest and most responsive hotline service in the world
- Most configurable solution to specifically address your business needs
- Highly trained communications specialist to collect the proper information
- Best incident management system to learn and drive change within organization
- Full support team dedicated to this product

