



The CDW Ethics Helpline

Frequently Asked Questions

Q. Does CDW management really want me to report suspected violations or ask questions through the Ethics Helpline?

A. Absolutely. Your reporting a suspected violation or asking a question before taking a questionable action can allow the company to avoid problems or address an incident before it becomes a major problem. You should always first think to raise such issues with your manager or supervisor but sometimes that might not be a realistic option or you may prefer more confidential guidance. The Ethics Helpline is there for coworkers in that situation and you are encouraged to take advantage of this resource.

Q. Isn't this just a "Big Brother" program making everyone suspicious of everyone else?

A. Absolutely not. The Ethics Helpline is a resource for coworkers with questions regarding ethical, compliance or legal questions regarding CDW. Sometimes determining the right thing to do is not easy and the Ethics Helpline is another resource to assist coworkers in these situations. Additionally, coworkers may encounter situations where they suspect that the actions of others could be putting the company at risk. Obviously, we can't ignore such risks but the best way to resolve them is also often unclear. The Ethics Helpline provides an easy way for coworkers to ensure that such risks are addressed appropriately. It is one of the ways we can all ensure we live up to the CDW Way.

Q. Why should I report what I know? What's in it for me?

A. CDW's success is in part based on the bond of trust it has established with its customers, coworkers, shareholders and other stakeholders. Ethical lapses can damage this trust and, as result, limit CDW's success. To protect that trust and help ensure our continued success, coworkers not only have a responsibility to act ethically but to speak up when they are concerned that others may not be acting appropriately. The Ethics Helpline is a resource for coworkers with questions regarding the right thing to do, and another option to fulfill our obligation to speak up when we suspect others are not doing the right thing. As shown by recent examples of companies hit hard by ethical misconduct, it only takes the misguided actions of a few, to threaten the continued success of an entire company.

Q. When should I use the Ethics Helpline?

- A.** You should use the Ethics Helpline in any of the following circumstances:
- you have an ethical, compliance or legal issue that you do not feel comfortable raising through normal channels;
 - you feel an ethical, compliance or legal issue you raised through normal channels has not been adequately resolved; or,
 - you would just like some confidential advice on a work-related ethics, compliance or legal issue.

Q. What type of issues should be reported?

A. Potential or suspected violations of law, the CDW Way Code (our code of business conduct and ethics), or CDW policy that you believe are not being handled properly should be reported immediately. Such violations could include, but are not limited to:

- Falsification of documents
- Inappropriate gifts and entertainment
- Inappropriate political activities and contributions
- Insider trading or other securities law violations
- Breaches of a customer's or CDW's confidentiality
- Inappropriate disposal of CDW's documents
- Inappropriate use of CDW's resources
- Theft
- Bribes and kickbacks
- Unlawful discrimination
- Harassment
- Workplace Violence
- Conflicts of Interest

Q. Will I get in trouble if I report something and it turns out I was wrong?

A. No, as long as the report was made in "good faith." CDW policy strictly prohibits retaliating against someone for making such a good faith report. By "good faith," we mean that you reasonably believed what you reported was true. On the other hand, if a report is made in "bad faith" – for instance, if a false or misleading report is made in an effort to get someone in trouble (as opposed to an honest mistake) – the person making the report may be subject to disciplinary action.

Q. Can I submit an anonymous report or question and, if so, is it really anonymous?

A. Yes and yes. Although not identifying yourself may limit our ability to fully review the matter, you do **not** need to identify yourself to file a report or ask a question. You will be given a password and "report key" after you file the report or ask a question that will allow you to go back into the system anonymously to respond to questions we may have or to see the answer to your question.

The on-line reporting system is hosted on an independent third party's servers and the phone number is answered and operated by this third party as well. If you choose to remain anonymous, CDW will not know your identity.

Additionally, the information contained in these reports are treated as confidential and only shared with those who need the information for purposes of reviewing the matter. The confidentiality measures in place are designed to respect those who may have been accused of inappropriate activity in a report, and those who submit a report or ask a question. So, even if you choose to identify yourself, care will be taken to protect your confidentiality.

Q. 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?

A. EthicsPoint, the third party who administers the Ethics Helpline, does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

Q. Can I file a report from home and still remain anonymous?

A. 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 maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

Q. I am concerned that the information I provide through the Ethics Helpline will ultimately reveal my identity. How can you assure me that will not happen?

A. The Ethics Helpline's system and procedures are designed to protect your confidentiality and anonymity. However, if you wish to remain anonymous, you also 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..."

Q. What happens when I call the Ethics Helpline to file a report or ask a question?

A. The Ethics Helpline is administered by a third party, EthicsPoint, Inc. When you place a call to the Ethics Helpline, the EthicsPoint call center specialist will capture your question or report, asking you provide detailed information about the report or question. You may choose to remain anonymous when speaking to the call center specialist; however, doing so may limit our ability to fully review the matter.

You should be prepared to provide as many details as possible regarding the report or question. Detailed reports and questions are essential to a successful review of your matter and/or a meaningful response to your question.

After capturing the information you provide, the EthicsPoint call center specialist will forward your question or report to CDW's Ethics and Compliance Office for review and follow-up, as appropriate. The EthicsPoint call center specialist cannot provide you with advice or

direction over the phone. If your matter is urgent, the call center specialist will provide you with the contact information for the Ethics and Compliance Office.

The call center specialist will provide you with a "report key" and password for you to access the "Follow-up on a Report" section of the Ethics Helpline Coworkernet site or to call back into the call center in order to check the status or resolution of your matter. Please check back with the Ethics Helpline after filing a report or asking a question to:

- Check the accuracy of your report or question;
- View an acknowledgement of your report or question;
- Find out if additional information is needed to process your question/concern;
- View status or updates to your matter; and/or
- Find out the resolution of your matter.

Continued follow-up on a matter is particularly important for anonymous reports or questions, where we have no other means to communicate with you. If you have identified yourself by name, the Ethics and Compliance Office or designated subject matter expert will contact you directly to discuss your concern and ask any additional questions they may have.

Q. What happens when I file a report or ask a question through the on-line Ethics Helpline reporting tool found on Coworkernet or the internet?

A. When you log on, a series of prompts will instruct you how to accomplish your task. When filing a report, you will be asked to provide the most detailed information possible about the report or question. You may choose to remain anonymous when submitting your question or report; however, doing so may limit a full review of the matter.

The facts or question you submit will be forwarded to CDW's Ethics and Compliance Office for review and follow-up, as appropriate.

When submitting your question or report, you will be given a report key and be asked to create a personal password. You will need this information to access the "Follow Up on a Report" section of the site to check the status or resolution of the report or question you submitted. Please check back with the Ethics Helpline after filing a report or asking a question to:

- Check the accuracy of your report or question;
- View an acknowledgement of your report or question;
- Find out if additional information is needed to process your question/concern;
- View status or updates to your matter; and/or
- Find out the resolution of your matter.

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Q. What should I do if I lose my report key or password?

A. As part of the effort to ensure the high level of confidentiality that is maintained for reports or questions submitted through the Ethics Helpline, we do not maintain a record of your report key and password. Therefore, we cannot provide you with this information if you lose it and to follow-up you will need to file a new report. You should mention in the new report that it relates to a prior report.

Q. I am not sure 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?

A. File a report. We'd rather you reported a situation that turned out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

Q. Where do these reports go? Who can access them?

A. Reports are entered directly on a secure server hosted by EthicsPoint (the third party that administers the Ethics Helpline) in order to protect your confidentiality. EthicsPoint makes these reports available only to specific individuals within the company who are charged with reviewing and following up on the report. The EthicsPoint system and staff are trained and committed to ensure that no report is ever shared with implicated parties, their peers, or subordinates.

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

A. The Ethics Helpline system is designed so that no report is ever shared with implicated parties. If an individual who would otherwise receive a report is implicated in the report, it is intercepted and redirected to other appropriate individuals for resolution. This will help to eliminate cover-ups by any implicated individual.