



## How to File a Report – How to Follow-up

What is Ethicspoint®: Omega (the “Company”) has chosen Ethicspoint to provide an ***anonymous and confidential*** reporting tool to communicate and help address incidents involving financial, accounting and auditing misconduct, and thereby promote a positive work environment. Addressing these types of incidents promptly minimizes any financial impact or morale issues to the Company, our clients and vendors.

What to Report: Situations, events or actions by individuals or groups involving any actual or suspected misconduct or fraud. For a complete description of the types of incidents you should report on this website, please see below. If you are still uncertain whether to report an incident on this website, please go ahead and report it. We would much rather you report the incident than let potential problems go unchecked. ***However, Ethicspoint® should not be used for immediate threats to life or property. These types of reports should be directed to emergency services immediately..***

How to File a Report: You can choose one of the following three totally ***anonymous*** methods to file your report at any time, 24 hours a day.

1. Click on the Ethicspoint® logo on the Company’s intranet site. You will automatically be taken to the secure Ethicspoint website at the Company’s report start page or to a page where you can identify the Company by entering its name. You will then enter the Company’s reporting module.
2. File an Ethicspoint® report from any computer worldwide having Internet access (for example, your home, a public library, an Internet café, etc.). The address is [www.ethicspoint.com](http://www.ethicspoint.com). When you get to the site, simply enter the Company’s name in the “To File a Report Now” box.

Follow these instructions and complete the entire report. First, you will be taken to a page reaffirming that the Ethicspoint system is not for emergency type calls, and reaffirming your responsibilities. To continue, click “I Agree” and you will then be taken to a page describing the types of violations to be reported on the Ethicspoint system. Once you have found the misconduct that best addresses the specific incident you wish to

report, click anywhere in that row to be taken to the report page. Take as much time as you need and be as accurate as possible in describing the situation. You must complete questions that are marked with a green asterisk (\*). Your anonymity is assured throughout the reporting and follow-up process.

3. Call the Ethicspoint toll-free hotline for your country. A specialist will ask if you wish to file a report or a follow-up. If you choose to file a report via telephone, the specialist will read the pages from the website and then enter your verbal responses into the Ethicspoint® reporting form.

This is a secure link so take your time in saying what you want to report. This will be an interview, not an interrogation. There will be no probing, prodding or putting words in your mouth, only clarifications where there may be some confusion. The specialist will then read the report back to you to ensure its accuracy. This process normally takes less than 15 minutes, but there are no time restrictions.

Follow-up Features: The follow-up features described in the next three paragraphs are extremely powerful tools designed to (1) assist you in describing and identifying the incident you want to report, and (2) ensure that enough information is provided to the Company so that the incident can be resolved to everyone's satisfaction. Occasionally, some of the details and pertinent information submitted by a reporter are accidentally left out of the initial report, or possibly the facts that are submitted need clarification. Also, new facts uncovered in the investigation may require your input. Ethicspoint has developed the Anonymous Dialog and EthicsChat options so that a reporter and the Company can enter into two-way communication **while still on an anonymous basis**. By following-up you not only can continue to impact the outcome of your report, but also demonstrate your sincere desire to see the process through to resolution. As you can see, your report and follow-up can and will make a difference to the Company and your fellow associates!

Anonymous Dialog – Follow-up in Two Working Days: At the end of your report, whether it is web-based or by telephone, you will be given a report key, a unique user name, and you will be required to select a password of your choice. Within two working days after filing your original report, it is important that you either (1) return to the Ethicspoint web site, or (2) call the Ethicspoint hot-line using the dialing instructions for your country. After clicking on LOGIN, enter (or give to the operator) the report key and password to review and reply to the Company's responses, questions and/or requests for further information. You may also enter additional information that has come to mind that would further assist the Company in resolving the issue more quickly. This follow-up or dialog phase can continue as often as necessary or desired, and will continue to be anonymous and completely confidential. You should return to the web site via internet or telephone regularly to see if any new responses from the Company have been

posted. If you should lose your report key or password, you must resubmit a new report from start to finish in order to remain anonymous.

**EthicsChat:** For issues where time is of the essence, the Company may opt to schedule an EthicsChat with you. EthicsChat is an anonymous, real time, two way communications feature. Individuals at up to three computers from the Company can ask questions that you will see immediately. Your responses will be viewed immediately and there may be further communication. There is no system time limit, only that of the participants. If you are entering a scheduled “chat” via telephone, tell the specialist that you wish to join an EthicsChat. The specialist will read the questions from the Company and then enter your responses verbatim directly into our web site. There is also no system time limit via the telephone. From the Internet you will click on “Chat About This Report”. A transcript will be attached to the original report so that you may review it anytime using the Follow-up route into the web site.

## Omega Compliance

 <b>Accounting and Auditing Matters</b>	<p>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, , wrongful transactions)</p>
 <b>Confidentiality, Privacy and Intellectual Property</b>	<p>Concerns related to the unauthorized or unlawful disclosure of confidential information related to a client, an employee, or third parties. Including but not restricted to use of labels, tags, designs, terms of business, etc.</p> <p>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)</p>
 <b>Conflict of Interest</b>	
 <b>Discrimination or Harassment</b>	<p>Uninvited and unwelcome verbal or physical conduct directed at an employee because of</p>

	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)
 <b>Embezzlement</b>	To appropriate (as property entrusted to one's care) fraudulently to one's own use. (Examples include: bookkeeping errors, misapplication of funds, and mishandling of cash)
 <b>Falsification of Contracts, Reports or Records</b>	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.
 <b>Gifts and Entertainment</b>	Refers to the inappropriate offering, solicitation or accepting of items of more than nominal value from vendors, customers or other third parties in a capacity as an employee of the Company.
 <b>Misconduct or Inappropriate Behavior</b>	Intentional wrongdoing; specifically: deliberate violation of a law or standard.
 <b>Nepotism</b>	Concerns regarding employment, roles or relationships of employees who are related to other employees, clients or vendors.
 <b>Retaliation</b>	Verbal, physical or written discriminatory or harassing behavior toward an individual who has made a good faith report regarding a compliance issue.
 <b>Sexual Harassment</b>	The making of unwanted and offensive sexual advances or of sexually offensive remarks or acts, especially by one in a superior or supervisory position or when acquiescence to such behavior is a condition of continued employment, promotion, or satisfactory evaluation.
 <b>Theft</b>	The act of stealing; specifically: the felonious

 <b>Violence or Threat</b>	<p>taking and removing of personal property with intent to deprive the rightful owner of it.</p> <p>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)</p>
 <b>Other</b>	<p>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.</p>
 <b>Suggestions</b>	<p>Any constructive comments, criticisms.</p>