

FREQUENTLY ASKED QUESTIONS

Q. Why has RDA decided to establish the RDA EthicsLine?

We believe that our employees are our most important asset. By creating multiple channels of communication, we can promote a positive work environment and maximize productivity. An effective reporting system can be our most useful tool to identify and address fraud, abuse and violations of the Code of Conduct.

Q. I thought we already had a hotline. How is this different?

The EthicsLine, which is managed by an outside vendor, EthicsPoint, replaces our Auditing and Accounting Hotline. While our prior hotline allowed the reporting of accounting and financial fraud, the EthicsLine expands the types of suspected violations that can be reported. Employees are encouraged to report possible violations in the areas of auditing and finance, as well as the broader range of ethical standards established in our Code of Conduct, such as incidents of harassment or discrimination, conflicts of interest and misuse of company assets. Please note that due to legal regulations in France, Germany, Spain, Belgium and the Netherlands, the EthicsLine will only allow reporting of accounting and financial fraud in those countries.

The EthicsLine allows employees to communicate suspected ethical violations anonymously if they so choose.

The new EthicsLine will provide a hotline reporting system that is universally available to all, regardless of time zone and the technology available, by allowing employees to report possible violations in multiple languages via the Internet (which can be viewed in multiple languages) and by telephone. The toll-free telephone numbers will be staffed by live operators employed by EthicsPoint, and will be available 24-hours a day, 365 days a year. All incoming foreign language calls into the ethics hotline are automatically routed to native speakers or connected with a live interpreter. The EthicsLine can accept call in more than 150 languages. In addition, the new EthicsLine can address international data privacy laws, including whistleblower guidelines and data transfers.

Q. How do I access the EthicsLine?

You will be able to access the EthicsLine via the internet at www.rdethics.com or by telephone at your EthicsLine toll-free hotline number for your country. Both methods of reporting are available 24 hours a day, 365 days a year. By giving you choices, the EthicsLine helps ensure that employees can file a report anonymously and in the manner most comfortable or convenient to them.

Q. Is the EthicsLine anonymous?

You can decide either to identify yourself when making a report or to report anonymously.

- Reports placed with the EthicsLine, as managed by outside vendor EthicsPoint, are protected by the latest encryption technology.
- The EthicsLine does not track or capture screen names or computer addresses (no cookies), to further protect the reporter's identity.
- Report access requires that both reporters and report recipients enter unique login information.
- The EthicsLine does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer to the EthicsLine is available.

Q. Do we really expect our employees to report from their desks or workstations?

Yes, but since the EthicsLine provides telephone and Internet reporting capabilities, reporters can choose to communicate from their home, a cell phone, a neighbor's computer, or even the library.

Q. Can a reporter choose to be identified, if so desired?

Yes. When a report is filed, the system will ask if the reporter wishes to be identified or to remain anonymous.

Q. May I report using either the Internet or the telephone?

Yes. By giving you choices, the EthicsLine helps ensure that employees can file a report in the manner most comfortable or convenient to them.

Q. I thought there were data privacy concerns in my country?

As a global organization, RDA must balance business ethics compliance with The U.S. Sarbanes-Oxley Act of 2002 and the laws of international jurisdictions, such as those in the European Union. There is often an apparent disconnect between compliance with one and compliance with another, given the complex nature of handling data privacy in countries outside the United States. In an effort to help address the data privacy concerns in France, Germany and certain other European Union countries related to the use of anonymous hotlines, our EthicsLine incorporates a data privacy solution that resolves these issues with the technological tools necessary to approach compliance on a global scale. The data privacy solution provides many of the technological tools required to address guidelines established by the European Union Article 29 Working Group, the French data protection agency (CNIL) and the German Düsseldorf Kreis, among others. We initially will offer data privacy reporting in France, Germany, Spain, Belgium and the Netherlands. In these countries, you will only be permitted to report accounting and financial fraud on the EthicsLine.

Q. Does RDA really want me to report?

We certainly do. More than that, we require it, as specified in our Code of Conduct. We all are Accountable for what occurs at RDA.

Q. If I see a violation, shouldn't I just report it to my manager, Security, Human Resources, Legal or Internal Audit and let them deal with it?

You certainly can, and we strongly encourage communication within these regular channels. First consider whether you are comfortable raising your concern directly within RDA, such as to your manager or to someone else in your department. RDA has found that internal concerns usually can be resolved most quickly and satisfactorily when they are raised with internal resources such as management or human resources. If you are uncomfortable doing so, if you do not know whom to contact, or if you believe your concern has not been satisfactorily addressed, please proceed with the filing of a report through the EthicsLine. The EthicsLine is an additional, optional tool available to those who feel more comfortable using it.

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

A report from home, via telephone or any computer, will remain secure and, if you choose, anonymous.

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

The EthicsLine system is designed to protect your anonymity. However, 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 office next to Jan Smith..." or "In my 33 years..."

Q. I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

RDA chooses to require and promote ethical behavior. 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 disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. If you know of any incidents of misconduct or ethical violations, IT IS YOUR DUTY UNDER OUR CODE OF CONDUCT, to be Accountable, and to report it. Failure to report a known violation could lead to dismissal.

We all have the right to work in a positive environment, and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

Q. I am not sure whether 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?

We encourage you to talk to your supervisor, HR representative or the Legal department with any questions. But if you prefer, you also can file a report with the EthicsLine. The EthicsLine 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 behavior go unchecked because you weren't sure.

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

Reports to the EthicsLine are entered directly on a secure server, managed by outside vendor EthicsPoint, to prevent any possible breach in security. EthicsLine reports are made available only to specific individuals within the company who are charged with evaluating and investigating the type of violation and location of the incident. Each of these report recipients has had training in handling these types of reports.

Q. What if I remember something important about the incident after I filed the report? Or what if the company has further questions for me concerning my report?

When you file a report through the EthicsLine, either by phone or via the internet, you will receive a unique user name and be asked to choose a password. You can return to the EthicsLine either by Internet or telephone and access the original report to answer questions posted by an RDA representative and to add further information that will help resolve open issues. If you reported anonymously, you will be asked to check back in at a specified time to answer follow-up questions. We strongly urge you to do so. There is also a "chat" feature, similar to instant messaging, for necessary communications. You and RDA now have entered into an "anonymous dialogue" where situations can not only be identified, but also investigated and resolved.

Q. Can RDA or EthicsPoint contact me directly about any concern that I report through the EthicsLine?

Not if you reported anonymously. Neither RDA nor EthicsPoint can contact you directly, because neither will know your identity. RDA may communicate with you indirectly through the EthicsLine in order to obtain sufficient information to pursue an effective inquiry, if you check back in as requested.

Q. Are follow-ups on reports as secure as the first one?

Yes.

Q. What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

Q. Can I still file a report if I don't have access to the Internet?

Yes. You can call the EthicsLine toll-free at the EthicsLine toll-free hotline number for your country. The toll-free telephone numbers will be staffed by live operators employed by EthicsPoint, and will be available 24-hours a day, 365 days a year. All incoming foreign language calls into the ethics hotline are automatically routed to native speakers or connected with a live interpreter. The EthicsLine can accept call in more than 150 languages.

Q. Is the telephone hotline 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 EthicsLine website. You may choose to remain anonymous.

Q. Might employees feel like someone is watching over them?

Some people might feel that way, but the EthicsLine concentrates on its positive roles and allows our employees to partner with us to ensure that we provide a safe and ethical workplace. Employees should feel encouraged to seek guidance on ethical problems and communicate their concerns. Effective communication is critical in today's workplace, and this is a great tool to enhance that communication.

Q. Can I suffer adverse consequences in my employment relationship with RDA as a result of submitting a message through the EthicsLine?

No. Retaliation against an employee who makes a good faith report is prohibited by our Code of Conduct, and the company will not permit it. In addition, the U.S. Sarbanes-Oxley Act of 2002 specifically provides protection against retaliation against employees who report information about fraudulent activities. The Sarbanes-Oxley Act provides that neither RDA nor any of its employees or agents may discharge, demote, suspend, threaten, harass, or in any other manner discriminate against an employee in the terms and conditions of employment because that employee has provided information that the employee reasonably believes constitutes various types of fraud.

Q. What if this is an emergency?

Concerns about an immediate threat of physical harm or damage to property should not be reported to the EthicsLine. If you require emergency assistance, please contact your local emergency services.

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