

Cobham Helpline - EthicsPoint

Everything you need to know

Frequently Asked Questions

What is the Helpline (EthicsPoint)?

- * Cobham's Helpline is a reporting service provided by the company to permit anyone to ask a question, report a concern or follow-up on a matter which has already been reported.

Who operates the Helpline?

- * Cobham's Helpline is operated by Navex Inc (EthicsPoint), an independent third party, whose independence from Cobham is designed to give employees an added level of comfort and security that their reports will remain as confidential as possible.

Why do we need a Helpline?

- * We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximise productivity.
- * Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud.
- * An effective reporting system will supplement our other efforts to foster a culture of integrity and good ethical decision-making.
- * Cobham has high ethical standards for conducting our business. If you believe someone has violated our standards, we want you to tell us so that we can look into the matter and correct any problems before they become more serious issues.



What type of situations should I report?

- * The Helpline uses Navex's EthicsPoint system which is designed for employees to report any violation of our stated code of business conduct, Corporate Policies or other concern you may have.
- * The Helpline is not provided as a method of raising employee grievances where there are already established procedures to follow to deal with such issues. Of course, if you are uncertain it is always better to raise your concern by the method you feel most comfortable with and it will be dealt with appropriately.

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

- * When you observe some behaviour that you believe violates our code of business conduct, we expect you to report it. Yes, ideally you should bring any concerns forward to your direct manager or other member of our management team. We recognise that there may be circumstances when you are not comfortable reporting the issue in this manner and we would rather you report anonymously than keep the information to yourself, so we provide the Helpline as an additional option.

When should I use the Helpline?

- * You should use the Helpline whenever you have an ethics or compliance issue that you would prefer to take to a third party rather than to your manager or someone else you work with directly. Your decision to use the Helpline is entirely voluntary.

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

- * 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 our entire company. Under our Code of Business Conduct, each employee has the responsibility to bring violations to the attention of an appropriate resource.



Does management really want me to report?

- * We certainly do. 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 minimise the potential negative impact on the company, our people and your colleagues. Also, offering positive input may help identify issues that can improve corporate culture and performance.

It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with, and won't this log identify me as a report originator?

- * The EthicsPoint system used does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, Navex is contractually committed not to pursue a reporter's identity.
- * If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as data shows that fewer than 12% of reports are generated during business hours.

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 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?

- * Either File a report or Ask a Question. The Helpline 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 and didn't report it.

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 are designed so that implicated parties are not notified or granted access to reports in which they have been named, regardless of the individual's position in the company.

Can I get in trouble for using the Helpline?

- * No. The Helpline is provided for your use and protection. Cobham has a strict zero-tolerance on any kind of retaliation against those who have chosen to use the Helpline to make reports in good faith.

May I report using either the internet or the telephone?

- * Yes. With Cobham's Helpline, you have the ability to file a confidential, anonymous report via either the telephone or the internet.

What happens if I just want to ask a question?

- * If you ask a question using the system, an answer will be provided back by the most appropriate resource. There will be no investigation into the matter. If you believe there is an issue that warrants an investigation once the question has been answered, you will need to raise a separate report via the Helpline.



What is Cobham's Helpline?

What if this is an emergency?

- * The Helpline should NOT be used in an emergency to report concerns about an immediate threat of physical harm or damage to property. If you require emergency assistance, contact 999 or 911 or your local emergency service.

How do I use the Helpline?

- * Cobham's Helpline has two methods of intake.
- * The first by toll-free telephone number, which is staffed 24/7. When you call, a professionally trained intake specialist will guide you through a series of questions designed to identify the relevant details of your report or question.
- * You can request a specialist to speak in your native language
- * At the conclusion of the call, the intake specialist will summarise the information and make any changes to ensure you are satisfied with the accuracy of your report.
- * The second method is the web intake portal system. This is available anywhere that you have access to the internet via www.cobham.ethicspoint.com . The intake portal asks you for the same types of relevant details as the telephone based system. Like the telephone-based system, the web intake portal is available 24/7.
- * You may choose to remain anonymous and the system makes no attempt to track your web address.

Can I enter a partial report and return to complete it later?

- * No. As the web intake portal will "time out" if you remain inactive for a period of several minutes, you should choose a time and place where you can use the system to complete your report in one sitting.



Is the Helpline secure?

- * Yes. Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. Only a very select number of personnel have access to these reports. The goal of the Helpline is to facilitate the flow of information and to provide a safe and secure way for employees to do so.

May I remain anonymous?

- * In all countries, except those that prohibit anonymous reporting, you may choose to remain anonymous. It is always easier to resolve your issue if you identify yourself, but you are not required to do so. If you do want to be identified, there is a section in the report to complete.

If I remain anonymous, how will I receive information on the status of my report?

- * Should you choose to report anonymously, you will be given a report key and password. Make sure you record these and keep them in a safe place as they cannot be replaced or reset. Thereafter, you may use your report key and password to access your report and check the status or answer any follow-up questions posed from those who are investigating the concern.

If I remain anonymous, how can investigators contact me?

- * When you are given your report key and password you can follow up either by telephone or through the web. If an investigator wishes to contact you regarding your concern, the investigator will leave you a follow-up message or question via the EthicsPoint system.
- * If you do wish to remain anonymous, it is important that you check your report status on a regular as this is the only way the Investigator will be able to contact you. The more information you can provide, the more thorough and efficient an investigation is.

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

- * All Helpline correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity if chosen.

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

- * The Helpline system is designed to protect 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 reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..."



What happens to the Reports?

Where do these reports go? Who can access them?

- * Reports are entered directly on a secure server to prevent any possible breach in security. The reports are only available to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident and this is overseen by the Business Ethics and Compliance Committee which is staffed by senior members of the executive.
- * If anyone is specifically named in a report, that person will not have access, regardless of their position at Cobham.

What happens next?

- * The report is reviewed by the appropriate Sector Ethics Officer and/or Corporate Compliance Officer and an investigator recommended to the Business Ethics & Compliance Committee for approval before assignment, to ensure an adequate level of independence.
- * A prompt and thorough investigation will then be conducted by the Investigator assigned, which in some instances can take some time to complete due to the complexity of some concerns. You will be kept informed of progress during this period, so it is important – especially if you have submitted anonymously - to check the status of your report on a regular basis to answer any additional questions.
- * Once the investigation has been completed, the Investigator completes a final report which is reviewed and approved by the BE&CC. Any remedial actions will be taken to address violations of law, regulations and our Code of Business Conduct or Corporate Policies.
- * Appropriate feedback will be provided which will normally include any remedial actions taken. Feedback will not comprise of a full copy of the investigation report. Cobham treats the specific details of the outcome with upmost discretion with regard to the people involved, which may have personal consequences.
- * All reports are kept in the EthicsPoint secure database to enable record keeping and case management. If you have documents, photos, video or email evidence you may also send to EthicsPoint or attach to your report and they will become part of the report case file.



Helpline Toll-Free numbers

- * Australia 1-800-339276
- * Canada 1-877-571-5226
- * Denmark 80-882809
- * Finland 0800-1-14945
- * France 0800-902500
- * Germany 0800-1016582
- * India 000-800-100-1071
- * Malaysia 1-800-80-0011
- * Mexico 1-8008407907
- * Netherlands 0800-0226174
- * South Africa 080-09-92604
- * Sweden 020-799-111
- * United Kingdom 0800 032 8483
- * USA 1-877-571-5226

