

## **ABM Compliance Hotline FAQ's**

### **Why should I use the Compliance Hotline?**

Contact the Compliance Hotline to report any incident of workplace harassment, discrimination, potential violations of the law, regulations, professional standards, policy, or the Company's Code of Business Conduct and Ethics.

### **When should I turn to the Compliance Hotline?**

You should turn to the Compliance Hotline in the following circumstances:

- If you believe that ethics and legal compliance issues are not being resolved, either through the existing managerial chain of command or other reporting options.
- If you don't feel comfortable reporting ethics or legal violations through normal channels.
- If you want to report workplace harassment. Reports of harassment may be made to the Hotline or to HR. You may remain anonymous, if you wish, in submitting a report.

### **What type of issues should be reported?**

- Theft
- Fraudulent or Negligent Accounting
- Payroll or Billing Fraud
- Worker's Compensation Fraud
- Conflicts of Interest
- Bribery or Kickbacks
- Insider Trading
- Code of Conduct and Ethics Violations
- Violations of Governmental Regulations
- Harassment and Discrimination
- Substance Abuse
- Safety, Security or Environmental Violations

### **Why do we use a Compliance Hotline?**

ABM Industries and its subsidiary companies have contracted with EthicsPoint, Inc. to administer the Compliance Hotline. Because the Compliance Hotline is administered by a third party vendor, we can provide our employees a confidential way to report concerns, 24 hours per day. If requested, reports can also be made anonymously. The Compliance Hotline's Web site is hosted on EthicsPoint's servers and the phone numbers are operated by EthicsPoint. A reporter's identity cannot be revealed through telephone or internet records. Reports can be taken in over 100 languages.

### **How do I report a potential violation using the Web site?**

1. Select "File a Report" from the Compliance Hotline homepage
2. Select an "Issue Type" that best describes your report topic
3. Fill out a report describing your concern
4. Record the report key and password for your report

Continued follow-up on a matter is particularly important for reports submitted anonymously, where we have no other means to communicate with you, the reporter. If you have identified yourself by name, a company Human Resources professional or other designated subject matter expert will contact you directly to discuss your concern and ask any additional questions we may have.

### **What happens when I call the Compliance Hotline phone number?**

The Compliance Hotline is administered by a third party, EthicsPoint, Inc. When you place a call to the Compliance Hotline, the EthicsPoint call center specialist will take your report and ask you to provide detailed information. You may choose to remain anonymous when speaking with the call center specialist; however, doing so may limit a full investigation of the matter. Therefore, you are encouraged to identify yourself. You should also be prepared, if you are willing, to provide the names of witnesses and potential victims of the alleged unethical conduct to increase the success of an investigation into your complaint. While inquiries and reports may be submitted anonymously, we cannot guarantee full confidentiality or anonymity as the resulting investigation may reveal the identities of those involved.

The EthicsPoint call center specialist cannot provide you advice or resolve your issue over the phone. If your matter is urgent, s/he will provide you with information to contact the company directly so you can receive immediate assistance.

The call center specialist will provide you with a report key and password for you to access the "Follow up on Report" section on the Compliance Hotline Web site, and check the status or resolution of the matter you reported. Please check back with the Compliance Hotline to:

- check the accuracy of the report
- view acknowledgement of the report
- find out if additional information is needed to process your inquiry/concern
- view status or updates to the investigation
- find out the resolution of the matter

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

Because of the secured access necessary for maintaining the reports, if you lose your report key or password, you will be required to file a new report. You can mention in the new report that this matter relates to prior report "X."