
COMMONLY ASKED QUESTIONS & ANSWERS

Why have we contracted with NAVEX Global for the reporting of concerns?

NAVEX Global is an independent company that provides secure, confidential telephone and web-based systems for use by those who wish to report a concern regarding business conduct. We are one of many organizations that contract with NAVEX Global for this service and we believe reporters will be more comfortable reporting a concern if they know they will be submitting them to an independent third-party. In addition to providing service 24 hours a day, NAVEX Global offers translation services that allow telephone and web reports to be submitted in dozens of languages.

What is EthicsPoint?

EthicsPoint is NAVEX Global's comprehensive and confidential reporting tool to assist management and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

What is NAVEX Global's role?

NAVEX Global's principal responsibilities are:

- Providing confidential telephone and web-based options for reporters to submit concerns about business conduct;
- Where permitted by local laws, respect reporters decision to remain anonymous;
- Provide translation services for those reporters who may report in languages other than English;
- Transmit information about the concern to designated resources within the company responsible for ethics and compliance so an appropriate investigation can be conducted; and
- Enable communication between a reporter and the company by serving as an intermediary which can relay follow-up questions, as well as information about the resolution of the case.

It is not NAVEX Global's role to take action to address the concern, only to transmit the concern to the appropriate designees.

What if this is an emergency?

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

Should I report my concern through NAVEX Global, my manager or a Human Resources representative?

First, consider whether you are comfortable raising your concern directly to an internal resource, such as to your direct manager, HR, or the Ethics and Compliance Office. Individuals within a company have indicated that, while sometimes challenging, directly addressing issues and or concerns with those involved can be very effective. If you are uncomfortable reporting your concern, do not know whom to contact, or believe your concern has not been satisfactorily addressed, please proceed with filing a report through NAVEX Global.

How can I report my concern to NAVEX Global?

If you wish to report a business conduct concern, you may complete a report on this website, or you may speak with a specialist in NAVEX Global's Contact Center, which answers calls to a specially-designated hotline maintained for Brightstar. Regardless of which option you select, so long as permitted by local laws, you will have the option to remain anonymous if you so choose.

The number you should use to contact the hotline can vary by country. In most cases, the company offers a telephone number you can call with no cost to you. Note, however, the hotline may initially be answered in English. The specialist who answers your call will arrange for fluency in your native language if you would prefer to report your concern in a language other than English. Contact Center Specialists are available 24 hours a day 365 days a year.

May I report my concern anonymously?

While reporters are encouraged to identify themselves when making reports, they are not obliged to provide their names, other than where is required by local law. You may report your concern anonymously by using either the web-based form or the telephone hotline, both of which are operated by NAVEX Global. When you complete the report submission process, you will be provided with a report key and asked to create a password. Retain these to follow up on the report you submitted.

We encourage you to check back in order to monitor the progress on your concern and add additional information, if necessary. This will also allow the company to ask follow-up questions, while protecting your anonymity where applicable.

If you choose to report anonymously, please take care not to report information that may personally identify you, such as your reporting relationship to others within the organization or your physical work location. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

Should I identify myself?

If you choose to identify yourself in reporting your concern, the company will make every reasonable effort to hold your name in confidence during the investigation. Note, however, that in some countries, we may be required by law to disclose your information during the course of an investigation.

Many investigations can be more quickly and effectively completed when the reporter is identified because it allows company investigators to follow up directly with the reporter.

How does NAVEX Global maintain confidentiality?

NAVEX Global does not trace phone calls or use functionality such as Caller ID. In addition, NAVEX Global does not generate or maintain Internet connection logs containing Internet Protocol (IP) addresses; no information linking you or your computer to NAVEX Global would be available if you choose to make a report. Reports from a computer would come through a secure Internet portal that does not trace or pass along any other information, such as user screen names or the like.

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 EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

How can I monitor progress on my concern?

At the end of your report, you will be provided with a report key and asked you to create a password. With those two pieces of identification, you can follow up on the report by visiting the NAVEX Global Internet portal or contacting the hotline. You may need to wait several days after you make your initial report, at which point you can monitor progress on your report and learn whether any additional information is needed from you to address your concern.

What should I do if I lose my Report Key or password?

Because of the high level of confidentiality that is maintained for 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 another report you supplied earlier.

How does the company investigate concerns?

NAVEX Global notifies designated representatives within the company when a concern is received. As appropriate, the company then commences an appropriate investigation, using internal or external resources with expertise in conducting investigations. The information in your report is shared with appropriate investigation team members, and the concern is investigated promptly and discreetly.

Where do these reports go? Who can access them?

Reports are entered directly on NAVEX Global's secure servers to prevent any possible breach in security. NAVEX Global makes these reports available only to specific individuals within the company who are charged with evaluating the type of violation and location of the incident and ensuring that an appropriate investigation is conducted. Individuals receiving these report recipients have had training in keeping these reports in the utmost confidence.

What if I face retaliation?

The company strictly forbids any retaliation against any person who reports a concern in accordance with Brightstar's Open Door Policy. Complaints made in good faith will not expose you to any sanctions, regardless of whether the underlying facts prove to be correct or result in any corrective action. If you believe you have faced retaliation of any kind, please report it so that the company can investigate.

Does management really want me to report?

They certainly do. In fact, they need you to report. Your willingness to report a problem or concern translates into an opportunity for the company to be better. Reporting a concern can minimize the potential negative impact on the company and our customers, and, most importantly, help to alleviate a difficulty you might be facing. Also, offering input may help identify issues that can improve corporate culture and the company's overall performance. If you observe or suspect a violation of company policy or of the law, as an employee, you have the obligation to speak up. Please do not assume that someone else is going to raise the concern. Unless you speak up, the company may not have the chance to investigate and address the situation.

TIPS & BEST PRACTICES

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

Our company chooses to 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 the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

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?

File a report. NAVEX Global 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.

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.

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

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an “anonymous dialogue,” where situations are not only identified, but can also be resolved, no matter how complex.

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

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.