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About EthicsPoint

What is EthicsPoint?

EthicsPoint is an independent company that provides secure, confidential telephone, mobile and web-based systems for use by those who wish to report a concern regarding business conduct. AAR is one of many companies that have contracted with EthicsPoint for this service in the belief that, in some cases, potential reporters will be more comfortable reporting a concern if they know they will be reporting to a professional, third party. In addition to providing intake services 24 hours a day, EthicsPoint offers translation services that allow telephone, mobile and web reports to be made in the native language of the reporter.

Why do we need a system like EthicsPoint?

The EthicsPoint system is for use in situations where an employee does not feel comfortable raising a concern using any of the usual channels of communication (e.g. the employee's supervisor, manager, or local Human Resources representative), or where the employee has reason to believe that using the typical communication and reporting channels has been, or would be, unsuccessful. We expect that such situations will be rare.

What is EthicsPoint's role with the AAR Ethics Hotline?

EthicsPoint's principal responsibilities are:

- Provide confidential telephone, mobile and web-based options for reporters to state concerns about AAR's business conduct;
- Protect the identity of reporters who wish to remain anonymous;
- Provide translation services for those reporters who wish to report in languages other than English;
- Transmit information about the concern to designated individuals at AAR so the company can conduct an appropriate investigation;
- Allow AAR to communicate with an anonymous reporter by serving as an intermediary which can relay follow-up questions and answers, as well as information about the resolution of the case.

It is not EthicsPoint's role to take action to address the concern, only to transmit the concern to designated individuals at AAR for handling the matter.

Reporting – General

Who can contact the AAR Ethics Hotline?

All employees of AAR affiliates may contact the AAR Ethics Hotline.

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential report via either the Internet, Mobile or the telephone.

Can I use EthicsPoint to report emergency situations at my place of work?

No. Concerns about an immediate threat of physical harm or damage to property should not be reported to EthicsPoint. If you require emergency assistance, please contact your local emergency services.

I am located in Europe. Are there any limitations on the issues I can report via the AAR Ethics Hotline?

Yes. There are limitations on the types of issues that can be raised due to data privacy and other laws that have been adopted by a number of European countries imposed by the EU Whistleblower Directive (“the Directive”).

While the Directive is not applicable to the UK, the UK Public Interest Disclosure Act 1998 also has a broad scope providing protection for disclosures regarding criminal offences, breaches of any legal obligations, miscarriages of justice, danger to the health and safety of any individual, damage to the environment, and deliberate concealing of information regarding the above. Given all of this, companies now generally do not restrict reporting in the EU or UK to particular topics.

For AAR employees at business units located in European Union countries or the UK, we allow for the reporting of any violations of relevant laws and/or AAR policies, rather than limiting reporting options to certain topics.

Please contact your supervisor, manager or local Human Resources representative to discuss further.

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 behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct supervisor, manager, local Human Resources representative, an attorney in the Law Department, or other member of your local management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

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 an entire company.

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 minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Can I make a report in my native language?

Yes.

How does the reporting system work?

If you make a web report, the site will prompt you to provide the information that is required to investigate a concern. You may make your report in any language. You will be given the option to either remain anonymous, where allowed by local law, or to provide your name and contact details.

Once you have completed your report, you will be provided with a Report Key and you will be asked to create a password. You can return to the site five or more working days after submitting your report for an update. At that time, we may need to pose questions back to you in order to investigate the matter further. You will need to enter both your Report Key and your password.

If you choose to submit a report via the telephone, your call will be answered in English by a qualified EthicsPoint call center specialist. Depending on the language in which you wish to conduct the conversation, the call center specialist will either continue with the call, transfer it to a colleague who is able to speak your language, or ask an interpreter to join the conversation.

During the call, you will be asked whether or not you wish to remain anonymous. The call center specialist will ask you for information relevant to the report. At the end of the call, you will be given a Report Key and you will be asked to create a password. If you want to call back later, the Report Key and password will enable EthicsPoint to access information about your report.

If you decide to remain anonymous, you can provide a personal email to receive follow-up responses from AAR throughout the investigation process. AAR will not receive your personal email address.

Once a report is made, details of the report will be sent to designated personnel at AAR for follow-up and investigation.

Isn't this system just an example of someone watching over me?

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security & Confidentiality

May I submit my report anonymously?

Yes, except if you are located in a country that prohibits anonymous reporting.

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

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint 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 EthicsPoint's 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. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity. If you decide to remain anonymous, you can provide a personal email to receive follow-up responses from AAR throughout the investigation process. AAR will not receive your personal email address.

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

The EthicsPoint 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, don't include statements in your report that provide clues to your identity, such as "From my cube next to Jan Smith..." or "In my 33 years..."

Are the telephone toll-free and collect-calling hot line options confidential and 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 EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery. If you decide to remain anonymous, you can provide a personal email to receive follow-up responses from AAR throughout the investigation process. AAR will not receive your personal email address.

What if the laws where I am located allow me to report anonymously, but I want to be identified with my report?

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

If I file a report, will I be told what the outcome is? At the conclusion of the investigation, AAR, through EthicsPoint, will usually notify you, (i) that the investigation is complete, (ii) whether or not the reported allegations or concerns were substantiated, and,

(iii) if the allegations were substantiated, that appropriate action has been or will be taken. However, due to confidentiality and privacy concerns, you will not receive details of findings from the investigation or actions taken, including any disciplinary action taken against another employee for misconduct.

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?

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. EthicsPoint 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 Report Key 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 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.