
FREQUENTLY ASKED QUESTIONS & ANSWERS

ABOUT NAVEX Global and the EthicsLine

What is the EthicsLine?

The EthicsLine is a comprehensive and confidential reporting tool to assist management and employees to work together to address fraud, corruption, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like the EthicsLine?

We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity. In several countries where ContourGlobal operates, there exist laws relating to the combating of bribery, and other laws that require us to operate whistleblowing hotlines as a reporting vehicle to address accounting and auditing fraud directly to the Board or Audit Committee. An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

REPORTING – GENERAL

May I report using either the Internet or the telephone?

Yes. With the EthicsLine, you have the ability to file a report via either the telephone or the web platform.

What type of situations should I report?

The EthicsLine is designed for employees to report any violation of ContourGlobal's Code of Conduct, policies or another concern you may have, as permitted by local laws. The types of issues that may be reported via the EthicsLine are: a) Accounting, Financial Issues, Fraud and Internal Financial Controls; b) Bribery and Corruption; c) Conflict of Interest; d) Environment, Health & Safety, Human Rights; e) HR, Employment, Harassment, Discrimination; f) IT Security; g) Retaliation; h) Theft; i) Inquiries, Questions or Requests for Information; and j) Other code of Conduct or Legal Violations, subject to any restrictions under applicable local laws.

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

When you observe behavior that you believe violates ContourGlobal's Code of Conduct or policies, we expect you to report it as this is part of your obligations in the Code of Conduct as an employee. Ideally, you should bring any concerns forward to your direct manager or other member of our management team. We recognize, however, that there may be circumstances in which you are not comfortable reporting the issue in this manner. It is for such circumstances we have partnered with NAVEX Global. What is important to us is that you report the issue through whatever forum you feel most comfortable – through the EthicsLine, or to your manager, HR or Legal and Compliance.

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

We all have the right to work in a positive environment. 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.

Where do these reports go? Who can access them?

Reports are entered directly to a NAVEX Global secure server to prevent any possible breach in security. NAVEX Global makes these reports available only to specific individuals within the Compliance department, who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

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

The EthicsLine is designed to help support our overall philosophy, and allows us to ensure 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

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

NAVEX Global does not generate or maintain any internal connection logs with IP addresses; no information linking your PC to NAVEX Global is available. In fact, NAVEX Global 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, the library, at a friend's house, etc.) through the NAVEX Global secure website.

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, where permitted by local laws. The Internet portal used by NAVEX Global to provide the EthicsLine never identifies a visitor by screen name and the NAVEX Global system strips away identifying information, such as an IP address. Plus, NAVEX Global is contractually committed not to pursue a reporter's identity.

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

The NAVEX Global system is designed to protect you. In fact, we are contractually committed not to pursue a reporter's identity. To further ensure your anonymity, you - as a reporting party - need to be careful not reveal any identifying details as part of your report. For example, "from my cube next to Jan Smith ..." or "in my 33 years ..." However, please note the comments in the section below regarding permissibility of anonymous reporting under local laws of some jurisdictions.

Is the telephone toll-free hotline confidential too and does it permit anonymous reporting?

Yes – the hotline does permit anonymous reporting so long as anonymous reporting is permitted by local laws (for example the laws of Spain do not permit anonymous reporting). -- you will be asked to provide the same information you would provide in an Internet-based report; the interviewer will type your responses directly into NAVEX Global's secure environment. Hotline-based reports have the same security and confidentiality measures applied to them during delivery as Internet-based reports.

What if I want to be identified with my report?

There is a section in the report where you may identify yourself, if you wish (note our comments above regarding anonymous reporting and permissibility under local laws). In fact, we encourage you to provide your identity because doing so will assist us in thoroughly reviewing and investigating your concern. Identifying yourself will allow ContourGlobal to protect you against any form of retaliation. We understand, however, if you prefer to report your concern anonymously and you may do so, so long as anonymous reporting is permitted by local laws.

TIPS & BEST PRACTICES

I am aware of some individuals involved in something but it doesn't affect me. Why bother reporting it?

Our company chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts ContourGlobal and all of our employees, including you. One only has to consider what happened in recent corporate scandals to see the disastrous effects a seemingly harmless lapse in ethics can have on an otherwise healthy company. 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 would rather you report a situation that turns out to be harmless than let possibly unethical behavior go unchecked because you were unsure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsLine and NAVEX Global system and report distribution protocols are designed so implicated parties are not notified about 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?

When you file a report, either using the Internet or through the EthicsLine's Contact Center, you receive a unique report key and are asked to select a password. With the report key and your password, you can return to the EthicsLine again, either by Internet or telephone, and access the original report. At that point, you can add more details.

What if you have questions for me concerning my report?

If you provide your identity, a member of ContourGlobal's Compliance department will contact you to discuss all the facts underlying your concern. Even if you chose to report anonymously (and this is permitted by the local laws in your jurisdiction), the EthicsLine provides functionality that enables company representatives to post questions for you, without revealing your identity. When you receive your report key, you will be provided with the amount of time we expect for the report to be processed. When that time has passed, we strongly suggest you check to see if any questions have been posted. Providing the opportunity for such dialogue means situations may not only be identified but can also be resolved, no matter how complex.

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

All EthicsLine correspondence is held in the same strict confidence as the initial report, continuing under the umbrella of confidentiality, and anonymity, if you so choose. (and where permitted by local laws).

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

If you don't have access or are uncomfortable using a computer, you can call the EthicsLine's toll-free hotline which is available 24 hours a day, 365 days a year. Dialing instructions vary by country but are accessible in the ContourGlobal Code of Conduct and Business Ethics and on ContourGlobal's EthicsLine

Web Intake Portal. On the Web Intake Portal, select the country you are located in under the “TO MAKE A REPORT” heading and a local phone number will be displayed for you to call.

What should I do if the telephone number is not working?

If the telephone number listed on the Web Intake Portal or the Code of Conduct and Business Ethics is not functioning, please make your report online through this web site. Please indicate in the report that the telephone number did not work.

What should I do if the country I am in is not listed on the Web Intake Portal?

If there is no phone service for your location, please make your report online through this web-intake portal. Please indicate in the report that dialing instructions for the country you are located in were not available.