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About EthicsPoint

What is EthicsPoint?

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

Why do we need a system like EthicsPoint?

- At APS, 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.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making, which reflects the core of our Values: *Do the Right Thing*.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone (1-844-282-9638) or the Internet (www.apsc.ethicspoint.com).

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our stated Code of Conduct and Ethics, and other serious improper conduct or reprisal as defined in the Whistleblower Policy.

If I see a wrongdoing or 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 and Ethics Policy, our Fraud Prevention Policy, or any other wrongdoing, we expect you to report it. In accordance with the Whistleblower Policy, any individual making disclosure under this Policy must act in good faith and have reasonable grounds for believing that the information disclosed is true and accurate. Any allegations that are knowingly false or otherwise made maliciously or for personal gain will result in serious consequences, including disciplinary action up to and including termination.

A wrongdoing may be made anonymously via EthicsPoint as noted earlier or directly to the Designated Officer at the following contact information: generalcounsel@apsc.ca or 780 391-3424.

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 organization.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in the organization - 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 Corporation 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?

All reports of wrongdoing are transmitted only to both the Designated Officer and the Chair of the Audit Committee of the APS Board of Directors.

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to these two noted individuals who are charged with evaluating the reports, based on the type

of wrongdoing and location of the incident. The Designated Officer and the Audit Committee Chair are required to keep these reports in the utmost confidence.

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

The EthicsPoint system forms part of APS' overall Whistleblower Program, which 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 or advice on ethical dilemmas, provide positive suggestions, or communicate a concern by contacting any of the Designated Officer, the Director of Compliance, the VP Human Resources, or your direct supervisor (please refer to the Whistleblower Policy). 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 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.

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, "From my workstation next to Jan Smith..." or "In my 33 years...".

Is the telephone toll-free hotline 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 website. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

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

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?

APS chooses to promote ethical behavior which is at the core of our corporate values. All unethical conduct, at any level, ultimately hurts the organization and its employees, including you. You only have to consider what happened in recent corporate scandals in the news 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 website or through the EthicsPoint Call Center, you receive a unique username 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 the assigned 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.

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

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.