

# **ETHICSPOINT: FREQUENTLY ASKED QUESTIONS**

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# **About Inter Pipeline's EthicsPoint**

### What is EthicsPoint?

 The Inter Pipeline EthicsPoint is a comprehensive and confidential reporting tool created by EthicsPoint NAVEX Global to assist management and employees in working together in addressing violations contemplated under Inter Pipeline's Whistleblower Policy.

# Why do we need a system like EthicsPoint?

- Inter Pipeline is committed to the highest standards of professional and ethical business practices. By creating open channels of communication, we maintain a workplace where concerns regarding questionable actions or business practices can be raised without fear of any retaliation.
- 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 Inter Pipeline's EthicsPoint you have the ability to file a confidential, anonymous report via either the telephone or online from Canada or anywhere in Europe.

### What type of situations should I report?

• EthicsPoint is designed for employees and contractors to report any violation of our Whistleblower Policy, or other accounting or auditing concern you may have.

# 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 Whistleblower Policy, we expect you
  to report it. Ideally, you should bring any concerns forward to your direct manager, or other member
  of our management team first.
- 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 made this third party hosted service available. 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 work 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 filed with Inter Pipeline and Inter Terminals EthicsPoint are entered directly on a third party
hosted secure server (called EthicsPoint) to prevent any possible breach in security. EthicsPoint
makes these reports available only to specific individuals within the company 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.

## **Reporting Security & Confidentiality**

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?

- Our third party contractor <u>does not generate or maintain</u> any internal connection logs with IP addresses, so no information linking your PC is available. In fact, our provider 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 Inter Pipeline EthicsPoint secure website (there is a link on www.interpipeline.com) Many people choose this option; 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 system strips away Internet addresses so that anonymity is totally maintained. Plus, our provider is contractually committed not to pursue a reporter's identity.

#### Is the telephone toll-free hot line 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.

### 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?

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 the Whistleblower policy, or involves unethical conduct, but it just does not look right to me. What should I do?

• File a report. The 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 report distribution is 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 Inter Pipeline EthicsPoint website or by phone, you receive a unique user name and are asked to choose a password. You can return to the Ethic Line again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative to 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 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 a 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 toll-free hotline, which is available 24 hours a day, 365 days a year.