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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a 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.

### Why do we need a system like EthicsPoint?

- 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.
- We want to provide our employees with an anonymous reporting vehicle to address accounting and auditing fraud of which the audit committee will be alerted.
- 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 EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

### What type of situations should I report?

The EthicsPoint system is designed for employees to report any concerns you have about the legality or ethics of any action or proposed action by an Orbis representative, or if you have a good faith belief that action needs to be taken in order for Orbis to be in compliance with applicable laws, policies or ethical standards. This includes concerns regarding discrimination, harassment, equal employment opportunity, confidentiality, fiscal impropriety, child protection, conflict of interest, corruption, legal compliance or a code of conduct.

The following are examples of actions or proposed actions that you are requested to report:

- False or misleading information in Orbis's financial or other public documents, including its tax returns;
- Supplying false or misleading information to, or withholding material information from, Orbis's auditors or directors;
- Embezzlement or payment for services or goods that are not rendered or delivered;
- Failure to disclose a conflict of interest or otherwise realizing an improper personal gain or benefit from a relationship with Orbis;
- Violation of Orbis's Conflict of Interest policy;
- Violation of Orbis's policies regarding equal opportunity, anti-discrimination, harassment-free workplace, anti-corruption, child protection, and acceptable workplace conduct;
- Conduct which is in violation of law;
- Facilitating or concealing any of the above or similar actions.

**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 manager, or other member of our management team. It is their duty to follow-up as per Orbis policies and procedures. 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 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 our 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 organization 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? Who does the follow-up?**

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the organization 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.

These report evaluators will initiate appropriate next steps to ensure prompt follow-up to your report. They will also ensure that the appropriate individuals are assigned to investigate. Investigators will be assigned based on their area of expertise and cannot in any way be connected to the concerns or allegations raised in the report.

If the report connects these 2 report evaluators to the concerns or allegations in the report, they will not be able to see the report and a special advocate will be informed so that alternative report evaluators can be assigned.

**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.

Furthermore, the ability to report confidentiality ensures that you are supported rather than being watched over.

## **Reporting Security & Confidentiality**

**It is my understanding that any report I send from an Orbis 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.

**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 cube next to Jan Smith..." or "In my 33 years..."

**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 a trained EthicsPoint 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?**

Orbis chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the organization and all employees, including you. You only have to consider what happened in recent scandals in global companies and international NGOs to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy organization. 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 organizational 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 organization 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 an Orbis 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 organization 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.