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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive reporting tool designed to help companies address issues of internal fraud, abuse, and other misconduct in the workplace. Created by NAVEX Global, this completely confidential resource allows management and employees to work together in a secure manner that helps cultivate a positive work environment.

Why do we need a system like EthicsPoint?

- At FOCUS Brands, our associates are our most important asset, and we're committed to creating an environment that allows for everyone's voice to be heard. By ensuring open channels of communication are available, we can better promote a positive and productive work environment.
- Having an effective reporting system in place will further reinforce our core values and beliefs, augmenting our efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

1. **What type of situations should I report to EthicsPoint?**

All concerns or complaints regarding company accounting, financial controls or auditing matters should be reported through the EthicsPoint system. Additionally, violations of FOCUS Brands' Code of Business Conduct and Ethics, Whistleblower Policy, or any other corporate policy, along with any violation of applicable law, should all be reported to EthicsPoint.

2. **How do I report a potential situation to EthicsPoint?**

EthicsPoint's robust capabilities allow you to report issues either by phone or through the secure internet server. If you, desire, you may report such issues anonymously.

3. **If I see a violation, shouldn't I just report it to my manager or human resources and let them deal with it?**

If you observe a behavior or action that you believe violates an applicable law, our Code of Business Conduct and Ethics, or any other corporate policy, it is your obligation as an associate to report it. We encourage you to bring any concerns to your direct manager or a member of our management team; however, we recognize 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 to provide you a confidential outlet for voicing your concerns. Remember - it is always better to report a potential violation anonymously than keep the information to yourself.

4. **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 a manner that is consistent with our company values and ethics. Choosing not to inform the appropriate individuals of a potential issue is considered unethical behavior, as corporate misconduct can threaten the performance of the entire organization. By working together, we can maintain a healthy and productive environment.

5. **Does management really want me to report complaints or concerns?**

Yes! We not only encourage this type of engagement, but we *need* it! You are on the front-lines of our daily operations, and have in-depth access to what goes on across the company - both the good and the bad. You may have initial knowledge of an activity that may be cause for concern, and by reporting, you can help minimize any negative impact that the issue may have on the company or associates. We are always looking for ways to enhance our workplace environment, so your constructive feedback and positive input may help identify issues that can improve our corporate culture and performance.

6. **Where do the internet reports go once I submit them? Who can access them?**

Reports are entered directly into the EthicsPoint secure server to prevent any possible breach in security. Once a report is submitted, EthicsPoint will make it available only to specific individuals within the company based on the nature of the violation. Each of these individuals have undergone confidentiality training and will evaluate the individual reports they are assigned with the utmost confidence and professionalism.

7. **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 ensure we are providing a safe, secure, and ethical workplace for all associates. Effective communication is critical in today's workplace, and all associates are encouraged to share concerns and seek guidance on ethical dilemmas. The EthicsPoint system provides a great tool to help enhance your ability to do just that.

Reporting Security & Confidentiality

1. **When I send a report from a company computer that includes my server credentials, won't I be identified as the report originator?**

EthicsPoint does not generate or maintain any internal connection logs that contain IP addresses, so it would not be possible to link your PC to a specific report. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity once a report is submitted.

If you feel uncomfortable making a report on your work computer, you can access the secure EthicsPoint website at any time and from any network, including a personal or shared computer outside of our work environment. An Internet portal never identifies a visitor by screen name, and the EthicsPoint system strips away Internet addresses to maintain complete anonymity.

2. **I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can I be assured this 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 inadvertently reveal your identity. For example, avoid any references that may indicate your personal details, such as noting your work location, tenure with the company, department, etc. ("From my cube next to Jan Smith..." or "In my 33 years...")

3. **Is the toll-free phone hot line confidential and anonymous as well?**

Yes. You will be asked to provide the same information that you would provide in an Internet-based report if you report a concern via phone. Once reported, an interviewer will type your responses into the EthicsPoint web site, which maintains the same security and confidentiality measures throughout review and delivery.

4. **What if I want to be identified with my report?**

There is a section in the report that allows you to identify yourself, if you wish.

Tips & Best Practices

1. **I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?**

Our company promotes ethical behavior, and any unethical conduct, at any level, ultimately hurts the company and all associates, including you. Consider the recent corporate scandals that have severely damaged a company's reputation or well-being, all from a seemingly harmless lapse in ethics. It is your duty to report any incidents of misconduct or unethical behavior that you become aware of, regardless of where it takes place within the company.

2. **I am not sure if what I have observed or heard is a violation of company policy, or if it involves unethical conduct, but it just does not look right to me. What should I do?**

When in doubt, file a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We would much rather have you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

3. **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 process are designed so that implicated parties are not notified or granted access to reports in which they have been named.

4. **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 on the EthicsPoint site or through the EthicsPoint Call Center, you will receive a unique user name and will create a personal password, which will allow you to return to the original report and add additional detail or answer questions. We strongly suggest that you return to the site in the time specified to answer company questions, as it helps ensure that open issues are resolved timely. You and the company have now entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

5. **Are the follow-ups I make to my report as secure as the original report?**

All EthicsPoint correspondence is held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

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

If you don't have access to the Internet during work, you can file an EthicsPoint report from any computer that can access the Internet, including your home or public computers. If you are more comfortable using the phone to report your issue, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.