

Global Forest Partners Ethics and Compliance Hotline

Who is Global Forest Partners LP?

Global Forest Partners LP (GFP) is an investment manager based in the USA that has been involved in forestry investments for over 25 years and currently oversees a range of properties with operations in 12 countries across 5 continents. While you may not be familiar with GFP's name, you are likely familiar with the names of our local partners who manage the day to day operations of the properties on our behalf. Our local property manager is the one who directed you to this website.

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to help management and employees work together to address misconduct in the workplace and cultivate a positive, safe and productive work environment.

Who may use the GFP EthicsPoint Hotline?

Any employee, contractor, subcontractor or vendor of GFP, the properties or property managers may use this hotline to submit reports.

How do I submit a report?

In most of our operating locations, there are two ways to submit a report with EthicsPoint: you may file a report via the internet using this website or by telephone using the numbers provided on the first page of this website after you select the country in which you are located.

Where do these reports go? Who can access them?

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 GFP's 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.

If I see a violation, shouldn't I just report it to my management locally and let them deal with it?

When you observe some behavior that you believe violates our code of conduct, we want you to report it. Ideally, you would bring any concerns to your direct manager or another member of the local management team. But we recognize that there may be times when you are unable to report issues locally or when you might be uncomfortable doing so. It is for such circumstances that we have provided this hotline in partnership with EthicsPoint. We would rather that you report the issue directly to us than keep the information to yourself.

Can I use the system to submit questions or suggestions?

Yes, you may use the system to request guidance on policies and procedures, legal or ethical matters. You may also use the system to submit constructive suggestions about any of these matters.

What types of situations should I report?

Accounting and Auditing Matters	Any issues related to the recording, analysis or reporting of the business and financial transactions associated with generally accepted accounting principles. (Examples include: misstatement of revenues, expenses, assets or liabilities; misallocation of revenues or expenses; misallocation of fees; misapplication of IFRS or GAAP principles; intentional submission of inaccurate financial reports; fraud, theft or other misappropriation of assets; internal control failures including insufficient segregation of duties, ineffective or absent internal controls, bypassed or overridden controls.)
Conflicts of Interest	A conflict of interest is defined as a situation in which a person has a personal interest sufficient to influence or appear to influence the objective exercise of his or her official duties. Conflicts of interest may also apply to organizations. (Examples include: personal or family financial interests in vendors, customers, or competitors; personal or family non-financial relationships with vendors, customers, or competitors; compensation received from vendors, customers, or competitors; personal or family participation in competitive activities.)
Discrimination or Harassment	Uninvited and unwelcome verbal or physical conduct directed at an employee because of his or her sex, religion, ethnicity, or beliefs. (Examples include: bias in hiring, assignments, promotions or educational decisions; wrongful termination; unfair compensation; inappropriate language.)
Environmental Stewardship	Actions that are in violation of GFP's Environmental Stewardship Policy, sustainable forest practices, or the principles and standards of applicable third party certification bodies. (Examples include: environmental damage; harm to animals; violation of FSC/ISO/SFI/CSCA principles or standards as applicable.)
Falsification of Records	Falsification of records consists of altering, fabricating, falsifying, or forging all or any part of a document, contract or record for the purpose of gaining an advantage, or misrepresenting the value of the document, contract or record.
GFP Corporate Compliance Program and Code of Ethics	For GFP "Supervised Persons" (as defined in the Global Forest Partners LP Regulatory Compliance Manual): violations of policies and procedures defined in the Compliance Manual and Code of Ethics. (Examples include: undisclosed conflicts of interest; personal trading in restricted securities; insider trading; violation of gifts and entertainment policy, political and charitable donations policy, outside activities policy.)
Health and Safety	The creation, perpetuation, or failure to correct unsafe working conditions and practices. (Examples include: failure to adopt or enforce safety policies and practices; violations of safety regulations; misreporting or failure to report safety violations, injuries or incidents; failure to take corrective actions)
Violation of Policy or Regulations	Actions that are in direct violation of company policy, procedures, code of conduct, or contractual responsibilities, or otherwise in breach of applicable laws or regulations. (Examples include: breach of non-disclosure agreements; mishandling or misuse of confidential information; violation of acceptable use policies; solicitation of bribes or kickbacks; payment of bribes or kickbacks; unauthorized destruction of documents or records.)
Violence or Threat	Violence includes physical actions resulting in or intended to result in damage to a person or their property. Threats include explicit or implied expressions of intent to inflict evil, injury, or damage to a person or their property.
Other	If you feel that the definitions above do not describe the event, action or situation you are looking to report about, please use this category.

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?

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 computer, you have the option of using a computer outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Most 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 need to ensure that the body of the report does not reveal your identity by accident. For example, phrases like "From my office next to Jan Smith..." or "In my 33 years..." may make it possible to identify you.

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?

All unethical conduct, at any level, ultimately hurts the company and all employees, contractors, and subcontractors, including you. Seemingly harmless lapse in ethics can have a toxic effect on organizations if not corrected.

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 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 a 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 have now 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 or any public location where you have access to a computer with an Internet connection. 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.