

Cook Global Ethics & Compliance Helpline

Frequently Asked Questions

1. What is the Cook Global Ethics & Compliance (E&C) Helpline?

The E&C Helpline provides a secure and confidential reporting mechanism that helps the Company identify and resolve ethical or compliance issues. Many companies have similar helpline reporting programs like this in place. The E&C Helpline is not intended to replace existing policies or procedures or less formal methods of resolving internal complaints or concerns regarding routine employment matters. Rather it is intended to complement the processes already in place and provide an additional tool for employees. Before using the E&C Helpline, we would always encourage employees to use normal internal channels (e.g. contact your Supervisor, Manager, HR etc.) to raise any ethical or compliance concerns that you may have.

2. What is EthicsPoint?

EthicsPoint is an independent reporting service that operates the E&C Helpline on behalf of Cook. This service allows employees to report concerns via telephone or by using the online web portal. When you use this service, your call or your visit to the web portal is not recorded by EthicsPoint. EthicsPoint does not use caller ID or track IP addresses. One of the purposes for using a third-party, like EthicsPoint, is to allow employees the option of reporting anonymously (where allowed by law).

3. Why did Cook contract with a third-party vendor?

EthicsPoint offers important services that would be impractical or cost prohibitive for Cook to create and maintain. EthicsPoint provides trained interview specialists, the option to not reveal your identity, 24/7 availability and aggregate reporting of trends and usage.

4. For what types of situations should I contact the Cook Global E&C Helpline?

The E&C Helpline is designed to receive questions about Cook policy and reports regarding suspected unethical or non-compliant activities. However, due to legal restrictions in some European countries, not all issues can be reported through the E&C Helpline. For example, in some countries only concerns relating to anti-bribery, accounting, banking and financial issues can be reported through the E&C Helpline. If you have a concern that cannot be reported through the E&C Helpline, please use Cook's existing internal reporting channels to raise your concerns e.g. contact your Supervisor, Manager, Human Resources

5. Is the Cook Global E&C Helpline appropriate for emergencies?

The E&C Helpline is not intended for emergency use. If you need emergency assistance or believe a crime is in progress, you should notify Cook management and/or call 911 in the U.S., or the equivalent number in your country immediately.

6. What happens when I contact the Cook Global E&C Helpline?

A customized web form or a professional interview specialist will document your concern, which can be done in your own language, and relay the information to the designated Cook official for review and follow up. Reports are handled promptly and discreetly.

7. Why should I report what I know?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner. Cook seeks to continue to build a successful organization with an outstanding reputation for ethical business practices that protects our core values. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate any concerns directly to Cook management or Human Resources at any time.

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

Cook seeks to promote ethical behaviors. Misconduct has implications for the entire Company and consequently all employees. Unethical conduct, at any level, ultimately hurts everyone. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it through the normal channels, or if you feel this is not appropriate, through the E&C Helpline.

9. What if I only suspect something is wrong?

Most instances of non-compliance are discovered through tips from honest people who are not sure of all the facts. If you report concerns to management, the HR Department or via the E&C Helpline, this can minimize the potential negative impact to the company. This type of good-faith reporting is encouraged as well as acceptable, keeping in mind that the intent of the report is to bring the issue to light, not to be malicious or hurtful.

10. Do I have to provide any evidence when I make a report?

When you report a concern, you do not need to provide proof or do any investigation on your own. All you need is good faith—a sincere belief that wrongful or unethical activity may have occurred.

11. If I know or suspect something, shouldn't I just report it to my manager or Human Resources and let them deal with it?

Cook encourages you to report suspected ethical or non-compliance concerns directly to your immediate supervisor, manager or to Human Resources whenever possible. However, Cook recognizes that this may not always be an option and has made the E&C Helpline available for these circumstances. Keep in mind that the E&C Helpline is not intended for employee complaints concerning wages, hours of work, performance evaluations, or other routine employment matters, which can be more appropriately dealt with by discussing the matter with your supervisor, manager or HR.

12. What if my supervisor or other managers are involved in a violation? Won't they get the report?

The report is accessed only by designated Cook internal investigators. During the investigation, only the appropriate parties who need to know will be contacted to properly investigate and address the issue.

13. Am I required to identify myself?

Cook encourages you to reveal your identity when raising concerns as it assists Cook in the investigation of any complaints. However, when submitting a concern via the E&C Helpline you do not have to reveal your identity at that stage. The information you provide through the E&C Helpline will be treated as confidential and privileged to the extent permitted by law.

14. What legal protection do I have when I report?

There are laws that protect individuals who provide confidential information regarding possible unethical, non-compliant or illegal activities in the workplace and Cook is committed to maintaining the confidentiality of such a reporter to the extent permitted by law. Employees who provide good-faith reports regarding possible unethical, non-compliant or illegal activities in the workplace will not be penalized for making the report. However, employees who intentionally and maliciously use the E&C Helpline to make false allegations shall be subject to disciplinary action if identified.

15. I am concerned that the information I provide Cook may ultimately reveal my identity. How can you assure me that may not happen?

While Cook encourages employees to reveal their identity when reporting issues, the EthicsPoint system is designed to protect your identity i.e. your calls or visits to the web portal are not recorded. However, as a reporting party, if you do not wish to reveal your identity, you need to ensure that the body of the report does not reveal your identity by accident through use of terms such as "my manager," "in XYZ building where I work," or "since I was hired in 1998," etc. Further, confidentiality and anonymity of a reporter is maintained to the extent permitted by law. However, it is important to recognize that a time may come during the investigation that you will be contacted through the E&C Helpline and asked to come forward and reveal your identity to allow the investigation to proceed. Your options will be explained at that time and it will be your decision as to how you wish to proceed.

16. Is the telephone Cook Global E&C Helpline confidential 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 website.

17. Can I file a report from home and still remain anonymous?

The E&C Helpline provided by EthicsPoint is designed to protect your anonymity. If you choose not to reveal your identity and do not provide identifying information, your report is anonymous regardless of your location when you file your report. See the responses to questions 15 and 22 for further information.

18. Where do these reports go? Who can access them?

Reports are referred only to specific individuals at Cook who are charged with evaluating the type of violation and facts of the incident on a case-by-case basis. The investigation of your report will be handled by HR, E&C, and/or Legal (as necessary). Each report investigator has had training in keeping these reports confidential.

19. What if I remember something important about the incident after I filed the report? What if Cook has further questions for me concerning my report?

When you file a report, you will receive a unique report ID number, a PIN and a follow up date. You can return to the EthicsPoint system again either by internet or telephone and access the original report. You can then answer questions posed by a Cook representative and add further information that may help resolve open issues. We strongly suggest that you return to the site within 7 days to answer any questions submitted by those reviewing the report. This will help to expedite a resolution to your report.

20. Are follow up reports as secure as the initial report?

All follow up correspondence is held in the same strict confidence as the initial report.

21. How do I know an investigation is taking place based on my report?

Cook is committed to promptly investigating all reports of unethical, non-compliant or inappropriate activity. When an issue is reported through the E&C Helpline, the specific action taken may depend on the nature and severity of the alleged violation. You can be assured that compliance related reports will be investigated; however, in order to maintain confidentiality of all parties involved (to the extent permitted by law) you may not be aware that an investigation has taken place or what, if any, disciplinary action was taken. On the follow up date, you will be provided with a brief message through the E&C Helpline that may provide you additional information. This is why we recommend that you return to the site regularly after making your report to see any messages from Cook.

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

Cook encourages employees to reveal their identity when reporting ethical or non-compliance concerns as it can assist in investigating the matter. During your report, you will be asked if you wish to be identified and you may provide your name at this point.

23. To whom within Cook should I address any questions I have about the Cook Global E&C Helpline?

If you have questions or concerns about the E&C Helpline, you may contact your local Ethics & Compliance representative, the Chief Ethics & Compliance Officer or Human Resources. See the Ethics & Compliance intranet site [here](#) for a list of E&C team members and contact information.

