About CHS HelpLine

What is the CHS HelpLine?

The CHS HelpLine provides a secure, confidential means by which employees and others can report concerns. The CHS HelpLine is administered through our confidential, secure partner, EthicsPoint.

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to help companies in addressing fraud, abuse and other misconduct in the workplace. CHS has selected EthicsPoint as an independent vendor to host its HelpLine.

Why do we need a system like EthicsPoint?

- At CHS, we're committed to acting with transparency and integrity in every interaction.
 This starts with maintaining an environment where open, honest communications are the expectation, not the exception.
- We believe our employees are our most important asset. We recognize that there may
 be situations where an employee has a question or wants to report a concern or
 incident, but may not be comfortable talking to his/her supervisor. We also realize that
 there may be times when a customer or other individual may wish to share a concern.
 Systems like EthicsPoint provide a means of sharing those concerns securely and
 confidentially.
- An effective reporting system supports our leadership expectation of Integrity and Accountability and builds a culture of integrity and ethical decision-making.
- Publicly traded companies are required by law to have an anonymous reporting tool to address accounting and auditing fraud.

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 at 1-888-264-0995 (reports made in the U.S. or Canada), or the Internet at CHS Helpline.

For employees outside of the U.S. and Canada: <u>Dial your AT&T Direct Access Code</u>. After the tone and the "AT&T" recording, dial 888-264-0995 to report your concern.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our CHS Global Code of Conduct, or other concern you may have. Some countries, however, may have laws around what can be reported to an U.S. helpline.

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

Perhaps. When you observe behavior that you believe violates our code of conduct, it is your responsibility to report. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team.

We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. This is why CHS chose to partner with a third party vendor, EthicsPoint, to make the CHS HelpLine available. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know?

Reporting wrongdoings is the right thing to do. All of us have a responsibility to conduct business with integrity and let the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy, positive and productive environment. Misconduct can threaten the livelihood of an entire company.

Does management really want me to report?

Absolutely. In fact, we **need** you to report. You may have initial knowledge of an activity that may be cause for concern. Your reporting helps raise awareness and can minimize the potential negative impact on our employees and the company.

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 CHS 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.

Security & Confidentiality

Is the CHS HelpLine confidential and secure?

Yes. The information you provide to EthicsPoint can be accessed by limited CHS employees on a strict need-to-know basis. These employees maintain confidentiality to the extent possible during the investigation.

Can the system determine who I am by the IP address with which my computer identifies?

No. EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC, laptop, tablet or mobile device 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 may want to consider using a computer outside of the work environment (such as one located at the library, home, a neighbor's computer or any Internet portal)

An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained.

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

Sometimes certain data can determine who provided it. When reporters provide information in good faith, CHS prohibits retaliation against anyone who provides information.

Is the telephone toll-free HelpLine confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internetbased 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?

CHS is committed to conducting business with the highest level of integrity. All unethical conduct, at any level, ultimately hurts CHS 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 company policy, or involves unethical conduct, but it just does not look right to me. What should I do? Report it! It's better to report a situation that turns out to be harmless, than let possible unethical behavior go unchecked because you weren't sure. EthicsPoint can help you prepare and file your report so it can be properly understood.

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 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?

Yes. All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.