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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist companies in addressing potential compliance violations.

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

An independent third-party like Ethics Point provides an additional channel of communication for employees to anonymously report issues of potential non-compliance.

## Reporting (General)

### May I report using either the Internet or the telephone?

Yes, with EthicsPoint employees have the ability to submit an anonymous report via the Internet or the telephone.

### What type of situations should I report?

The EthicsPoint system is designed for employees to report issues of potential non-compliance with applicable law, the Code of Conduct, Policies and Procedures or other relevant compliance and ethics concerns.

### Am I required to report issues of potential non-compliance?

All employees have an obligation to promptly report perceived misconduct including actual or potential non-compliance.

### How do I report?

There are various resources to report compliance concerns and individuals may use whatever method of communication with which they are most comfortable. Compliance reports may be made to an individual's manager, Legal Department, Human Resources, any member of the Executive Team or the Compliance Hotline.

### **When is EthicsPoint available?**

EthicsPoint Internet reporting and telephone line reporting are both available 24 hours a day, 7 days a week, 365 days a year.

## **Reporting (Security & Confidentiality)**

### **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 the company 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.

### **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 this log can 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 (e.g., Internet café or a friend's house) through the EthicsPoint secure website. Many people choose to submit reports outside of their work environment. In fact, 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, in order to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity. For example, words such as, "From my cube next to Jan Smith..." or "In my 33 years..." could reveal your identity.

**Is the telephone toll-free hot line confidential and anonymous too?**

Yes, telephone callers will be asked to provide the same information as a reporter who utilizes the Internet-based report. During the phone call an operator 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?**

If you would like to identify yourself, there is a section in the report to do so.