

About EthicsPoint

1. What is the purpose of the EthicsPoint system?

EthicsPoint is a confidential reporting and helpline tool to provide Sierra Nevada Corporation (“SNC”) leadership and employees with a platform to work together to address workplace safety, fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment. SNC has contracted the hosting and operation of this system to a third-party provider, NAVEX, a company which provides systems for corporate governance and risk compliance.

2. Why do we need a system like EthicsPoint?

- We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- The EthicsPoint system is a reporting mechanism that provides an avenue for employees and external stakeholders to report potential breaches of SNC’s Ethics and Principles Policy and Code of Ethics and Business Conduct Procedure and any health, safety or environmental concerns.
- SNC, as a government contractor, is required to have a mechanism for employees to report misconduct. EthicsPoint differs from existing mechanisms because it allows anonymous reporting directly to the Ethics Committee.
- The EthicsPoint system augments our other efforts to foster a culture of integrity and ethical decision-making. It also serves as a means to enhance corporate governance practices and provides our employees, business partners and customers with additional assurance that SNC has systems in place to reduce and prevent breaches of SNC’s ethical standards.

Reporting – General

3. May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report by telephone or the Internet. Information on how to file a report is provided [here](#), under the EthicsPoint “To Make a Report” section. SNC employees may also access the EthicsPoint system internally through the intranet.

Individuals choosing to use the toll-free telephone option will speak directly with an EthicsPoint operator. Operators use a standard list of questions to help callers file their report. No personally identifiable information is collected unless you choose to disclose it.

Individuals choosing to use the online systems are redirected to a website hosted by EthicsPoint. Once on the EthicsPoint site, users are asked a series of questions to identify the type of report being filed and to gather information necessary to conduct an investigation.

4. 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, including your home. Many public locations, including the public library, have Internet-accessible computers. 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.

5. Will reports be accepted through means other than the EthicsPoint site or hotline?

Yes. SNC will continue to investigate any reported Code of Ethics and Business Conduct violations or health, safety or environmental concerns, whether they are received by letter, phone, reports made directly to management or Human Resources, or other means.

6. What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our stated Code of Ethics and Business Conduct, or other concern you may have. Reports may be filed under two categories:

- **Ethics Concern or Situation**
- **Health, Safety or Environmental Concern or Situation**

The primary purpose of the EthicsPoint system is to accommodate reports which fall within the scope of SNC Code of Conduct and Business Conduct or are health, safety or environmental concerns. It is not meant to serve areas where SNC already has established processes in place.

7. What information should I not include in a report?

Classified, Controlled Unclassified Information (CUI), operationally sensitive information, or International Traffic in Arms Regulations (ITAR)/Export Administration Regulations (EAR) controlled information should not be included in any report. The inclusion of this type of information may result in the unauthorized transmission or receipt of classified or sensitive material. In the event you believe that such information is relevant to your report, please indicate that you have such information to share and the Ethics Officer will coordinate with you via the EthicsPoint system how you may best share this information without risking any unauthorized transmission or receipt.

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

When you observe some behavior or circumstance that you believe violates our Code of Conduct and Business Ethics or health, safety or environment standards, we expect you to report it. The most straightforward method to report concerns is to bring them forward to your direct manager, or other member of SNC's management team. We recognize, however, 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. We would rather you report anonymously than keep the information to yourself.

9. Should I make my report anonymously?

When using the EthicsPoint web portal or the telephone hotline, you are not required to identify yourself. However, if you choose to remain anonymous, SNC's ability to investigate the matter may be impaired and we may not be able to fully address all of your concerns. If you choose to identify yourself, your identity will be treated confidentially and shared only with a limited number of people who have a need to know or are responsible for dealing with reports and investigations.

SNC will not tolerate retaliation against any employee, contractor, or any other individual who in good faith, raised such an issue or used the EthicsPoint web portal or hotline (or any other appropriate channel) to report a concern that is believed to be illegal, unethical or otherwise violates our Code of Ethics and Business Conduct.

10. 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 SNC who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients have a responsibility as part of their duties to keep these reports in the utmost confidence.

11. Isn't this system just an example of someone watching over me?

The EthicsPoint system supports SNC's philosophy, by allowing us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication. SNC has carefully chosen this reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

12. What happens after I file a report?

You will be assigned a unique report key by EthicsPoint and prompted to create a password, which will allow you to check on the status of your report.

EthicsPoint will forward the information gathered to the Ethics Officer at SNC. The Ethics Officer will conduct a preliminary assessment to determine if action is warranted. The Ethics Officer will also determine whether the report is related to an ethics concern or a health, safety or environmental concern. Ethics reports are referred to the Ethics Committee. Safety, health or environment reports are referred to the Safety department.

If it is determined a report requires further investigation, a formal review will be launched. In some cases, other individuals in the organization may be asked to investigate the report. For ethics reports, the Ethics Committee – representatives from legal, human resources and internal audit – will conduct the review and determine appropriate action.

You are encouraged to check on the status of your report or submit more information pertaining to your report. Additional information may be required to conduct an investigation. In the event of an anonymous report, the Ethics Help Line serves as the only method of communication the Ethics Officer has with the reporter. As such, this is where you would view any follow-up questions posted by the Ethics Officer or investigators.

13. How long will it take for a report to be closed?

The length of an investigation will vary depending on its complexity. We endeavor to conclude investigations in a timely matter.

14. Will I be informed of the results of the investigation and any action taken?

You will be informed through EthicsPoint when an investigation has been concluded. Due to privacy and legal concerns, the results of an investigation may not be able to be disclosed to you. If it is determined legal action is required, it is possible details of a report and investigation may become public knowledge through normal legal proceedings.

Reporting Security & Confidentiality

15. 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 PC, you have the option of using a PC outside our work environment (such as one located at home, at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

16. 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.

17. 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 - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..." are details that could inadvertently reveal a party's identity.

18. Is the telephone toll-free hotline 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 EthicsPoint Call Center interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

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

There is a section in the report for identifying yourself, if you wish. SNC encourages employees to identify themselves when reporting concerns. This improves SNC's ability to investigate the matter and fully address all of your concerns.

20. What if I remember something important about the incident after I file the report? Or what if SNC 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.

21. 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.

Reporting Expectations

22. Why should I report what I know? What’s in it for me?

All employees have an obligation to SNC to report conduct that may be illegal, unethical, or in violation of SNC’s Code of Ethics and Business Conduct. We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment.

23. Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on SNC and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

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

SNC promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the company 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.

25. 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.

26. 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.

27. Will I get in trouble for making a report?

SNC will not tolerate retaliation against any employee, contractor, or any other individual who in good faith, raised such an issue or used the EthicsPoint web portal or hotline (or any other appropriate channel) to report a concern that is believed to be illegal, unethical or otherwise violates SNC's Code of Ethics and Business Conduct. SNC also does not tolerate retaliation against anyone who assists or participants in any manner in any investigation, proceeding or hearing. However, disciplinary measures may be taken against anyone if they participated in the prohibited activity, even if they reported it.

28. Will any action be taken if a report is deemed to be filed in bad faith or found to be without merit?

SNC expects all reports to be made in good faith. A bad faith complaint is one filed by a person (1) knowing that it is false or misleading or knowing that there is not a sufficient preliminary indication of breach or non-compliance, or (2) solely to intentionally harm any person or entity associated with SNC. Such reports are unwelcome and violate SNC's Code of Ethics and Business Conduct. SNC may take disciplinary and/or other remedial action against anyone who makes a report in bad faith.

A report filed by someone who believes it to be true, although not ultimately proven through investigation, is not a bad faith complaint and no action will be taken.