

Frequently Asked Questions

About this Compliance Hotline

What is the purpose of this Compliance Hotline?

All ITOCHU Group companies in North America participate in our Compliance Program, an important piece of ITOCHU Corporation's worldwide compliance efforts. Our Compliance Hotline is an essential piece of our Compliance Program. We encourage you to submit any legal or ethical concern. Submitting a claim is helpful to the company, and both easy and convenient. All claims submitted via the Compliance Hotline will be investigated and considered by the Compliance Committee of ITOCHU International Inc.

Is this the same Hotline used by ITOCHU Corporation?

No. This Compliance Hotline is independent from the hotline maintained by ITOCHU Corporation.

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by our Compliance Hotline service provider, NAVEX Global, to assist with addressing fraud, abuse, harassment, discrimination, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- We believe that our employees are essential to the success of our company. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

How can I make a report?

With EthicsPoint, you can file report via internet, telephone, or mobile.

May I make a report confidentially and anonymously?

Yes, with EthicsPoint, you can file any report confidentially and anonymously. Since the information submitted is the starting point for an investigation, if you choose to report anonymously, a lack of information may impact our ability to investigate.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of the company's internal rules or policies, or other concern you may have.

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

When you observe some behavior that you believe violates our Code of Conduct or other internal rules or policies, we expect you to report it. You may raise any concerns with your direct manager or other member of our management team; however, we recognize that there may be circumstances when you are not comfortable reporting an issue in this manner. In such cases, EthicsPoint can be used to report an issue.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility to act in an ethical manner and to let the appropriate people know if someone is acting inappropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

Does management really want me to report?

Yes, we do. In fact, we need you to report. You are in the best position to 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 and your reporting can minimize the potential negative impact on the company and our people.

Also, offering positive input may help identify issues that can improve corporate culture and performance.

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 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 regarding keeping these reports in the utmost confidence. EthicsPoint will ensure that an accused individual does not receive a report made against them.

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

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows 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.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

What if I think I am being retaliated against for reporting a concern?

Our company does not tolerate retaliation. We seek to provide a safe, healthy, and productive workplace. We prohibit retaliation against any employee who in good faith reports or participates in an investigation of a possible violation of our Code of Conduct or other company policy.

Reporting – Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every website that my computer connects with, so 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 computer 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 your home, an internet café, 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.

Can I file a report from home and 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 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 - as a reporting party - need to ensure that the contents of the report do not reveal your identity by accident. For example, details such as "From my cube next to Jan Smith..." or "In my 33 years..." may allow you to be identified.

Is the telephone toll-free hotline and mobile hotline confidential and anonymous too?

Yes. For reporting via telephone, 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 website. For reporting via mobile, you will enter the same information in a reporting form. 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 choose to do so.

Tips & Best Practices

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

We choose to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. If you consider what happened in recent corporate scandals, it should be clear 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?

File a report. We would 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 website, through the EthicsPoint call center, or through the EthicsPoint mobile intake system, you receive a unique report key and are asked to choose a password. You can return to the EthicsPoint system again either by internet, telephone, or mobile 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 questions.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondence is 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?

If you don't have access to the internet or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, 844-269-9218, which is available 24 hours a day, 365 days a year. You can also report using the mobile intake, which can be accessed by scanning the QR code below with a smart phone.

