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## What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool to assist management and employees to work together to address fraud, abuse, 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 our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- Several laws and regulations worldwide require or recommend having an internal channel open to third parties, to report anonymously, confidentially and directly about fraud, corruption and

other unethical behavior. An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

## **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 or the Internet.

## **What type of situations should I report?**

The EthicsPoint system is designed for employees and people who have business or interest in our Company to report any violation of our stated Code of Conduct, or other concern you may have.

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

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, other member of our management team or Ethics Committee. 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.

## **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 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. Corporate misconduct can threaten the livelihood of an entire company.

## **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 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 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.

## **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.

## **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 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 generated during business hours.

## **May I report my concern anonymously?**

Other than where prohibited by law, you may report your concern anonymously by using either the web-based form or the telephone hotline, both of which are operated by EthicsPoint. When you complete the report submission process, you will be provided with a report key and asked to create a password. Retain these to follow up on the report you submitted.

We encourage you to check back in order to monitor the progress on your concern and add additional information, if necessary. This will also allow the company to ask follow-up questions, while protecting your anonymity where applicable.

If you choose to report anonymously, please take care not to report information that may personally identify you, such as your reporting relationship to others within the organization or your physical work location.

## **Should I identify myself?**

If you choose to identify yourself in reporting your concern, the company will make every reasonable effort to hold your name in confidence during the investigation. Note, however, that in some countries, we may be required by law to disclose your information during the course of an investigation.

Many investigations can be more quickly and effectively completed when the reporter is identified because it allows company investigators to follow up directly with the reporter.

## **How does EthicsPoint maintain confidentiality?**

EthicsPoint does not trace phone calls or use functionality such as Caller ID. In addition, EthicsPoint does not generate or maintain Internet connection logs containing Internet Protocol (IP) addresses; no information linking you or your computer to EthicsPoint would be available if you choose to make a report. Reports from a computer would come through a secure Internet portal that does not trace or pass along any other information, such as user screen names or the like.

## **Is the toll-free hotline also confidential and anonymous?**

Yes. You will be asked to provide the same information you would provide in a complaint online and an interviewer will write your answers on the EthicsPoint website. During its transfer, the same security and confidentiality measures are applied to these complaints.

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

Our company chooses to promote 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.

## **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.

## **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 be resolved, no matter how complex.

## **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.

## **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. You can file from home. Many public locations, including the public library, have Internet computers.

If you don't have access or are uncomfortable using a computer, you can call your toll-free hotline number which is available 24 hours a day, 365 days a year.

You can find telephony instructions by [clicking here](#).

## **What if I face retaliation?**

The company strictly forbids any retaliation against any person who reports a concern. Complaints made in good faith will not expose you to any sanctions, regardless of whether the underlying facts prove to be correct or result in any corrective action. If you believe you have faced retaliation of any kind, please report it so that the company can investigate.

## **What should I do if I lose my Report Key or password?**

Because of the high level of confidentiality that is maintained for reports, if you lose your report key or password, you will be required to file a new report. You can mention in the new report that this matter relates to another report you supplied earlier.