

ABOUT NAVEX Global and EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool to assist Infineum and colleagues 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 colleagues are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.

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

REPORTING – GENERAL

What type of situations should I report?

The NAVEX Global EthicsPoint system is designed for colleagues to report any violation of laws or regulations or the Infineum Code of Conduct.

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

When you observe behavior you believe violates our Code of Conduct, we expect you to report it.

Ideally, you should bring any concerns forward to your direct leaders or another member of our leadership team or to a representative of Human Resources, Finance or Law. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances we have partnered with NAVEX Global. We would rather you report through EthicsPoint than keep the information to yourself.

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

We want you to be able to work in a positive environment. With that 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 leadership 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 to a NAVEX Global secure server to prevent any possible breach in security. These reports may be accessed and used only by relevant personnel of Infineum (and sometimes external professional advisors where appropriate) who are involved in investigating, deciding on, and addressing the issues raised in the reports.

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

The NAVEX Global system concentrates on being a positive aspect of our overall philosophy, and allows us to ensure 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.

REPORTING SECURITY & CONFIDENTIALITY

It is my understanding that any report I send from a company computer generates a server log that shows every website my PC connects with; won't this log identify me as a report originator?

NAVEX Global does not generate or maintain any internal connection logs with IP addresses; no information linking your PC to NAVEX Global is available. In fact, NAVEX Global 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, the library, at a friend's house, etc.) through the NAVEX Global secure website (infineum.ethicspoint.com). Many people choose this option, as NAVEX Global'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, where permitted by local laws. An Internet portal never identifies a visitor by screen name and the NAVEX Global system strips away identifying information, such as an IP address, so that anonymity is maintained. Plus, NAVEX Global is contractually committed not to pursue a reporter's identity.

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

The NAVEX Global system is designed to protect you. In fact, we are contractually committed not to pursue a reporter's identity. To further ensure your anonymity, you - as a reporting party - need to be careful not to reveal any identifying details as part of your report, if it is your intent to make an anonymous report. For example, "from my cube next to Jan Smith ..." or "in my 33 years ..."

What if I want to be identified with my report?

There is a section in the report where you may identify yourself, if you wish.

What if the report I make requires an investigation that involves me?

Depending on the nature of the report, if you choose to remain anonymous then it may be difficult for Infineum to conduct a thorough investigation and reach a conclusion as to the facts of the particular matter.

TIPS & BEST PRACTICES

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

Infineum expects ethical behavior of its colleagues. All unethical conduct, at any level, ultimately hurts the company and all colleagues, including you. 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. NAVEX Global can help you prepare and file your report so it can be properly understood. We would rather you report a situation that turns out to be harmless than let possibly unethical behavior go unchecked because you were unsure.

What if my leader or other leaders are involved in a violation? Won't they get the report and start a cover-up?

The NAVEX Global system and report distribution protocols are designed so implicated parties are not notified about 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?

When you file a report, you receive a unique report key and are asked to select a password. With the report key and your password, you can return to the NAVEX Global system again and access the original report. At that point, you can add more details.

What if you have questions for me concerning my report?

NAVEX Global provides functionality that enables company representatives to post questions for you, even if you report anonymously. When you receive your report key, you will be provided with the amount of time we expect for the report to be processed. When that time has passed, we strongly suggest you check to see if any questions have been posted. Providing the opportunity for such dialogue means situations may not only be identified but can also be resolved, no matter how complex.

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

All NAVEX Global correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity, if you so choose (and where permitted by local laws).

Can I still file a report if I don't have access to the Internet?

You can file an NAVEX Global report from any computer that can access the Internet. You can file from home. Many public locations, including most public libraries, have Internet computers.