

About EthicsPoint

What is EthicsPoint?

To reinforce its commitment to compliance and integrity, HJF has implemented an Ethics Hotline reporting system called EthicsPoint. EthicsPoint is a comprehensive, confidential and easy to use reporting tool created by NAVEX Global, a third-party provider which specializes in ethics and compliance professional services. EthicsPoint assists HJF management, its subsidiaries and affiliates and employees work together to address misconduct in the workplace, all while cultivating a positive work environment. It also provides an additional option for HJF employees to ask for ethics guidance related to their work at HJF.

Why do we need a system like EthicsPoint?

- The EthicsPoint system is one aspect of HJF's commitment to establishing and maintaining a safe, secure, and ethical workplace. Effective communication is critical in today's workplace and this is a great tool to enhance that communication. You are encouraged to use it to seek guidance on ethical dilemmas, provide positive suggestions, constructive feedback, or communicate a concern. We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.
- Complying with all laws, regulations, policies and procedures can sometimes be confusing. There is one guideline to follow in every situation – do the right thing – and if in doubt about the right thing to do, stop and ask. EthicsPoint is a confidential, easy to use and always available option for asking questions and reporting concerns.
- An effective and comprehensive reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a report via either the telephone or the Internet. You may identify yourself or you may choose to file an anonymous report – you are not required to provide your name.

What type of situations should I report?

The EthicsPoint system is designed for employees and other individuals to report any violation of HJF's Code of Ethics, its policies, and the law related to conduct in the HJF workplace

If I see a violation, should I just report it to my manager or Human Resources and let them deal with it?

If you observe behavior that you believe violates our Code of Ethics, we encourage you to report it. Ideally, you should bring any concerns forward to your direct supervisor/manager, HR

Business Partner, other members of management or the Ethics & Business Conduct (EBC) 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 to provide another channel to report your concerns.

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

We all have the right to work in an ethical environment and with that right comes the responsibility for acting in an ethical manner and speaking up if someone is not acting appropriately. By working together, we can maintain a healthy, positive and productive environment.

Does management really want me to report what I know?

YES - We certainly do. You know what is going on in our organization - 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 HJF and our employees. Also, when employees share information, this may identify issues that need to be addressed in order to improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to minimize any possible loss of confidentiality. EthicsPoint then provides these reports directly to HJF's Ethics & Compliance team for handling – either responding to your questions or reviewing your concerns. Each of these report recipients, and any other employee who is assigned to handle a reported matter, has had HJF internal investigator training provided by HJF's Chief Ethics and Compliance Officer.

Reporting Security & Confidentiality

If I make a report on EthicsPoint from an HJF computer won't a server 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 prohibited from trying to identify a reporter.

HJF also will not try to identify a reporter who chooses to remain anonymous.

If you feel uncomfortable making a report on your work PC or laptop, you have the option of using a PC or laptop outside your work environment (such as one located at an Internet café, at a public library, at a friend's house, etc.) through the EthicsPoint secure website.

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 maintained.

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 if you so choose. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that content you include in the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

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 interviewer will type your responses into the EthicsPoint Website. 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 wish.

Tips & Best Practices

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

Employees are required to report all incidents of misconduct or ethical violations in connection with HJF operations and not doing so is a violation of the HJF Code of Ethics. Any unethical conduct, at any level, ultimately hurts HJF and its employees, including you. You only have to consider recent corporate scandals to see the disastrous effects that a seemingly isolated lapse in ethics by a single individual or small group of individuals can have on an entire organization.

I am not sure if what I observed or heard is a violation of HJF's policy, or involves unethical conduct, but it just did not look or feel right to me. What should I do?

File a report. Notify your supervisor/manager, HR Business Partner, the Ethics & Business Conduct department or contact EthicsPoint to help you prepare and file your report. 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 [or worse, retaliate against me for reporting them]?

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. HJF's Code of Ethics addresses retaliation and specifically states, "No employee will be disciplined, lose his or her job, or be retaliated against in any way for asking questions, voicing concerns, or reporting possible violations concerning legal or ethical obligations, so long as the employee acted in good faith. *"Good Faith"* does not mean the employee has to be right but does mean the employee is truthful and believes that the information provided is accurate." The HJF Employee Handbook also includes a consistent message on Non-Retaliation.

What if I remember something important about the incident after I file the report? Or what if HJF has further questions for me concerning my report?

When you file a report at the EthicsPoint website or through the EthicsPoint call center, you receive a unique username 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 an HJF 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 any HJF follow-up questions as part of an “anonymous dialogue,” where situations are not only identified, but can also be resolved, no matter how complex.

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

All EthicsPoint follow-up correspondence is held in the same strict confidence as the initial report, continuing under the umbrella of confidentiality or anonymity (depending on how it was initially reported).

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 to or are uncomfortable using a computer, you can call the EthicsPoint tollfree hotline, which is available 24 hours a day, 365 days a year.