

About PALIG Ethics Hotline

Reporting – General

Reporting Security & Confidentiality

About the PALIG Ethics Hotline

Why does PALIG have an Ethics Hotline?

The PALIG Ethics Hotline has been established to provide PALIG employees, customers, producers, business partners and vendors with a means of asking questions about our policies and Code of Conduct and/or confidentially reporting any issues or concerns regarding unethical, unprofessional, illegal, fraudulent or other questionable behavior, including but not limited to those relating to our Code of Conduct.

Who operates the PALIG Ethics Hotline?

PALIG's Ethics Hotline is operated by an independent external organization, NAVEX Global (<https://www.navexglobal.com/en-us>), which provides confidential and, if so desired, anonymous hotline reporting solutions for organizations worldwide. NAVEX Global collects information from the reporter and then passes the report to PALIG for follow-up and investigation. You can find out more about NAVEX Global at <https://www.navexglobal.com/en-us>.

Who can contact the PALIG Ethics Hotline?

The PALIG Ethics Hotline is available to PALIG employees, customers, producers, business partners and/or vendors to ask question or report violations of our policies, Code Conduct or the Law.

Customers: Please do not confuse unethical behavior or fraud with a dispute, inquiry, or complaint that you have or may wish to file. If you have a general or service related inquiry not involving unethical behavior or fraud please visit the following link for the appropriate contact: <https://www.palig.com/contact>.

Reporting – General

When can I contact the PALIG Ethics Hotline?

You can contact the PALIG Ethics Hotline at any time via the PALIG Ethics Hotline website, or by calling the toll-free hotline telephone number most local to you, which can be found on the PALIG Ethics Hotline website at www.palig.ethicspoint.com. The hotline is available 24 hours a day, 7 days a week, 365 days a year.

What type of situations should I report?

The PALIG Ethics Hotline enables individuals to immediately report any issues or concerns regarding unethical behavior or non-compliance with laws, company policies and our Code of Conduct.

Examples of questionable behavior include but are not limited to: improper sales practices, fraud, retaliation, undisclosed conflicts of interest, Code of Conduct violations and suspected money laundering, among others.

Customers: Please do not confuse unethical behavior or fraud with a dispute, inquiry, or complaint that you have or may wish to file. If you have a general or service related inquiry not involving unethical behavior or fraud please visit the following link for the appropriate contact: <https://www.palig.com/contact>.

Employees: The PALIG Ethics Hotline is not intended for reporting questions or concerns regarding performance, discipline, and human resources policies on such issues as dress code violations, personality conflicts and disputes between employees that would not be considered unethical conduct. However, if an employee does not feel comfortable talking to their manager and/or Human Resources, he or she may report the matter to the Ethics Hotline.

Should I identify myself?

It is usually easier to conduct a more complete investigation if you identify yourself and those involved because it allows the PALIG investigator to directly follow-up with you and others. If you choose to identify yourself in reporting your concern, PALIG will make every reasonable effort to hold your name in confidence during the investigation.

However, you should note that it is not possible to guarantee absolute confidentiality in all circumstances. Disclosure to others inside or outside PALIG may be required by law in certain cases. For example, there may be a legal requirement for disclosure in the case of reported money laundering. In addition, it is also possible that someone could guess your identity from the circumstances in your report.

You should not let these possibilities discourage you from reporting a concern.

Can I report my concern anonymously?

You may report your concern anonymously by using the PALIG Ethics Hotline – online or by phone. The PALIG Ethics Hotline does not trace phone calls or use Caller Identification. In addition, it does not generate or maintain internal connection logs containing Internet Protocol (IP) addresses, so no information linking your computer to the Ethics Hotline would be available if you choose to make a report online. Reports from your computer would come through a secure Internet portal which does not trace or show user screen names.

Where do these reports go? Who can access them?

Reports are entered directly on the PALIG Ethics Hotline secure server to prevent any possible breach in security. These reports are available only to specific individuals within PALIG 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.

If I see a Code of Conduct violation, shouldn't I report it to my manager, human resources, legal, internal audit or compliance and let them deal with it?

When you observe some behavior that you believe violates our Code of Conduct, company policies or the law, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of the management team, Human Resources, Legal, Internal Audit or Compliance. We

recognize, however, that there may be circumstances when you are not comfortable reporting the issue, know who to report it to, or believe that your concern has not been addressed. The PALIG Ethics Hotline is simply another available option to raise concerns, and allows you to remain anonymous if you prefer.

The PALIG Ethics Hotline serves a similar purpose for our customer and/or third parties who may not know where to report ethical issues or concerns.

Can I ask a question or make an inquiry through the Ethics Hotline?

Yes, you may ask questions about PALIG policies or Code of Conduct by clicking on **Ask a Question** online. When asking a question, you will be prompted to complete an intake form and provide information about yourself in addition to specific details on your question.

Your inquiry will then be routed to the appropriate PALIG personnel to review and respond. All questions are reviewed promptly and confidentially to the extent possible.

How do I report a concern through the Ethics Hotline?

You may make a report to the PALIG Ethics Hotline by phone or online.

The PALIG Ethics Hotline is managed by a third party, Navex Global. This confidential call center and secure internet site will receive your questions and reports. You may use the PALIG Ethics Hotline to file a report or follow up on a prior report. Whether you call or report online, you will be given step-by-step instructions on how to complete the report.

When filing a report online, you will be asked to select a category that describes the situation you are reporting, i.e. fraud, conflicts of interest, retaliation etc. There are several categories you can select from and each category has a detailed description, including examples. If you are not sure which category fits the situation you are reporting, you should select "Other."

You will also be asked to provide as much detailed information as possible, including your location, when and where the incident occurred, the parties' involved, specific department or areas, specific policy or incident details etc. You may also attach supporting documents.

Once your report is submitted, you will be provided a Report Key and password. Please write those down as you will need them to follow-up on your case.

What happens when I file a report using the Ethics Hotline?

Your report will then be routed to the appropriate PALIG personnel to review and investigate. All reports are investigated promptly and confidentially to the extent possible.

Depending on the complexity of the case, some investigations may take time to complete. In some cases, you may be asked for more details about the case in order for us to investigate the matter further. If you chose to give your name and contact information, you may be contacted by appropriate PALIG personnel.

A determination is made whether an investigation is necessary and if sufficient information has been provided. For confidentiality reasons, details of the investigation or outcome may not be shared with you.

In all cases, we ask you to please follow up with your Report Key and password until the case is closed. This will ensure that we have all the necessary details for our investigation and will give you the certainty that you deserve in knowing we have addressed your concerns or questions.

What is the difference between Reporting a Concern and Asking a Question?

The difference between **Reporting a Concern** and **Asking a Question** is that when you report a concern is because misconduct may have already happened. When asking a question, you may want to request clarification on how to interpret a policy or may need guidance with regards to a confusing situation. Keep in mind that **Asking a Question** may also lead to **Reporting a Concern**.

When will I receive a response to my question/inquiry or report?

PALIG will strive to make at least an initial response or acknowledgement within five to six (5-6) working days of receiving the report. However, follow-up may often require a more detailed and thorough investigation that may take longer to complete. For confidentiality reasons, details of the investigation or outcome may not be shared with you.

Please make sure to follow up on your report to check the status of your report or whether your question has been answered. This will help us communicate the investigation results or ask for further details in order to conduct the investigation or answer your question.

Remember you will need your Report Key and password in order to follow up on your inquiry or report. Make sure you write them down or save them electronically. If you lose your Report Key and password, you will need to fill out a new report.

How can I monitor progress on my concern? 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?

At the end of your telephone call or online report, you will be provided with a Report Key and be asked to create a password. Using the Report Key and password you will be able to access the original report to add additional information or answer questions where further information is required / necessary by the company, as well as inquire about the status of the concern.

Due to the high level of security that is maintained for these reports, if you lose your Report Key and password, you will need to fill out a new report. When filing the new report you should mention that it is related to a report you previously filed.

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

All PALIG Ethics Hotline correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity when applicable.

Can I get into trouble for contacting PALIG Ethics Hotline? If I make a report, could I be subjected to some form of retaliation?

No. You may report suspected or potential illegal or unethical behavior without fear of retaliation. Retaliation is prohibited under the PALIG's Code of Conduct and related policies. The only instance in which reporting could have negative consequences is when it is done in bad faith.

Do I need proof that someone is doing something wrong before making a report?

We encourage you to report any legitimate, good-faith concerns, even if you do not have proof of wrongdoing. Of course, making intentionally false allegations through any channel is a serious legal matter.

Reporting Security & Confidentiality

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

The PALIG Ethics Hotline 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, e.g. "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 online report and an interviewer will type your responses into the PALIG Ethics Hotline website. These reports have the same security and confidentiality measures applied to them during delivery.

You will have the option to remain anonymous, if you prefer.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish. You also have the option of identifying yourself when you make a report via phone.

If I call the PALIG Ethics Hotline, will my call be recorded?

No. However, in order to create a report, the interviewer will take notes of your call.

What happens if the recipient of the report is the subject of the concern?

The NAVEX Global system checks the name reported against the names of those in the report distribution, and flags any possible conflicts. Where this occurs, the person named in the report will be removed from the recipient list for the specific report.

Who can I contact if I have additional questions about the PALIG Ethics Hotline?

You can contact the Global Compliance & Ethics team by sending an email to ethics@palig.com.