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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

### Why do we need a system like EthicsPoint?

The purpose of this site is to provide information and tools for reporting possible illegal, unethical, or improper conduct, as outlined in our Code of Conduct. Use of this site is voluntary and those who report illegal or improper conduct will be protected from retaliation.

# Reporting – General

## 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 allows employees, contingent workers, vendors or other third parties to report any violation of our Code of Conduct, or other concern you may have relating to possible illegal, unethical or improper conduct involving Gates Ag One.

## If I see a violation, shouldn't I just report it to my manager or Human Resources 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. Yes, ideally, you should bring any concerns forward to your manager, foundation Human Resources or Assurance & Risk Management, Gates Ag One's CEO or Board of Managers, or foundation legal counsel. 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 through EthicsPoint than keep the information to yourself.

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

We all have an expectation to work in a positive environment and with that expectation 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.

## 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 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 the organization and our people.

## 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 organization 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.

## Reporting Security & Confidentiality

**It is my understanding that any report I send from a work computer generates a server log that shows every website that my computer 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 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 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 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. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally 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, if you choose this option in the reporting form. 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. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

**Is the telephone toll-free hot line 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 Web site. Reports made by phone have the same security and confidentiality measures.

**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 with Gates Ag One who have behaved unethically, but it doesn't affect me. Why should I bother reporting it?**

It is the responsibility of Gates Ag One employees and external individuals or entities who do business with our organization to report integrity concerns. Together, in our relationships to Gates Ag One, we are expected to do our individual part to act with integrity and honesty, be fair and respectful to colleagues and partners, follow the law, ensure disciplined stewardship of Gates One Ag's assets, and hold one another accountable. We encourage you to report to uphold this standard.

### **I am not sure if what I have observed or heard is a violation of policy, or involves unethical conduct, but it just does not look right to me. What should I do?**

File a 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?**

The EthicsPoint system and report distribution are designed so that implicated parties are not notified by EthicsPoint 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 organization 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 any questions that Gates Ag One's response team may have about the report.

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

If you choose to make an anonymous report, any follow up correspondence will be managed in the same manner.

**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 toll-free hotline, which is available 24 hours a day, 365 days a year. Calls are toll free within the United States, Guam, Puerto Rico and Canada.