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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX to assist management and employees work together in addressing unlawful or unethical conduct in the workplace.

Why do we need a system like EthicsPoint?

The EthicsPoint System supports the [Whistleblower Policy](#). Further, an effective reporting system will foster a culture of integrity and ethical decision making.

Reporting – General

How can I make a report?

With EthicsPoint, you have the ability to file a confidential, anonymous report via either the Internet or telephone (specified countries only).

What type of situations should I report?

You should report any violation of our [Code of Conduct](#), or other improper, illegal or unethical conduct of which you become aware.

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

When you observe behavior that you have reasonable grounds to believe violates our [Code of Conduct](#), or is otherwise improper, illegal or unethical, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, other member of our management team, People & Culture, General Manager – Assurance, or the General 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, to enable you to report the matter anonymously. We would rather you report anonymously than keep the information to yourself.

*Note: If you are in Australia or working for an Australian entity, any report should be made to the people listed in paragraph 3.1 and 3.5 of Section 2 of the [Whistleblower Policy](#).

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 and foster a culture of integrity.

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.

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 the Whistleblower Contact Officer, General Counsel and General Manager - Assurance. Each of these report recipients has had training in keeping these reports in the utmost confidence.

The Contact Officer is charged with evaluating the report, determining if an investigation of the report is appropriate and who will conduct the investigation. Please refer to the

[Whistleblower Policy](#) for more details as to how a report is dealt with.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every website that my computer connects with. Will 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 home, 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. 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 desk next to Jan Smith..." or "In my 23 years with the company...".

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. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified in 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 unethical conduct, but it doesn't affect me. Why should I report it?

Pact Group chooses to promote ethical behaviour. All improper, illegal or unethical conduct, at any level, ultimately hurts the company and all employees, including you. So, if you know of any incidents of misconduct, breaches of law, or ethical violations, please report it.

I am not sure if what I have observed or heard is a violation of company policy, or involves illegal or unethical conduct. What should I do?

File a report. EthicsPoint 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 possible improper, illegal or unethical behavior go unchecked.

What if my boss or other managers are involved in a violation? Won't they get the report and cover it 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 website or through the EthicsPoint hotline, 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 (specified countries only) 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 also be resolved.

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 to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline (specified countries only), which is available 24 hours a day, 365 days a year.