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About EthicsPoint

What is EthicsPoint?

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

Why do we need a system like EthicsPoint?

- Our employees are our most important asset. By creating open channels of communication, we promote a positive work environment and maximize productivity.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using the Internet, my mobile or orally on the telephone?

Yes. The Hexcel Safe Talk Helpline through NAVEX's EthicsPoint system enables you to file a confidential, anonymous report via the telephone, your mobile or the Internet.

What types of situations should I report or any questions about?

The Hexcel Safe Talk Helpline allows employees to report any violation of our Code of Business Conduct, Hexcel's Values, company policies or any other concern you may have. You are also strongly encouraged to use the Hexcel Safe Talk Helpline to ask the Compliance Department any question you may have on a work-related legal or ethical issue.

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, action or omission that you believe violates our Code of Business Conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or other member of your management team, or alternatively to Human Resources. 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 NAVEX Global to allow you to report through other than regular channels, using the Hexcel Safe Talk Helpline. We would rather you report through the Hexcel Safe Talk Helpline, either directly or anonymously, than keep the information or your concerns to yourself.

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

All Hexcel employees have the right to work in a safe, positive, cooperative and productive environment and with that right comes the responsibility for all employees of acting in an ethical and compliant manner and letting the appropriate people know if someone is not acting accordingly. By working together, we can maintain a safe, healthy and productive environment for all Hexcel employees. This is part of Accountability for all employees under the Hexcel Values. In addition, employee ethical lapses, misconduct or misbehavior can lead to serious financial, legal and reputational damage and costs for our company.

Does management really want me to report?

We certainly do. In fact, we *require* you to report non-compliant and inappropriate behavior. You know what is going on in Hexcel - both good and bad. You may have knowledge unknown to anyone else of an activity or action 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 Hexcel's safety, culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. NAVEX Global makes these reports available only to a very limited number of members of the Hexcel's Compliance Department who are responsible to evaluate each report, based on the description provided in the report. Based on this evaluation, a decision is made as to how (of if) the report should be considered and investigated, subject to company law as well as local law and regulation. Each recipient is obligated by Hexcel company policy (including its data privacy policy) to keep these reports in the utmost confidence.

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

No. The Hexcel Safe Talk Helpline is a part of Hexcel's overall emphasis on encouraging employee engagement and discussion to promote a safe, secure and ethical workplace. You are strongly 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.

Hexcel has carefully chosen Ethics Point to provide the best reporting tool for our employees to meet Hexcel's legal, ethical and compliance obligations, while maintaining a positive and confidential reporting environment for everyone.

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 PC connects with. Won't this log identify me as the report originator?

NAVEX Global does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

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 or at a friend's house) through the EthicsPoint secure website. Many people choose this option, as NAVEX Global 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, on your mobile or through 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.

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 protects 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, a report that includes language such as: "From my cube next to Jan Smith..." or "in my 33 years...", may provide clear indications as to the identity of the reported. It should be noted that anonymous reports with insufficient detail may not allow for a full review and investigation.

Is the telephone toll-free Helpline 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 with my report?

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

Tips & Best Practices

I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?

Hexcel actively promotes and expects ethical behavior from all of its employees. All unethical conduct, at any level, ultimately hurts the company and its employees, including you. You only have to consider what has happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy company. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your co-workers to report them.

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 prefer you report a situation that turns out to be harmless than let possible unethical behavior go unchecked. It should be emphasized that in accordance with Hexcel policy, no employee who in good faith reports a potentially unethical or illegal situation will be disciplined or retaliated against if the report proves to be unsubstantiated.

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 ensure 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 through the Hexcel Safe Talk Helpline (whether via phone, your mobile or your computer), you will receive a unique, randomized number called a "Report Key" and you are asked to choose a password. You can return to the Hexcel Safe Talk Helpline system again either by Internet, telephone or mobile and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer any questions raised by your report. You and the company now have entered into 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 one?

All EthicsPoint correspondence is held in the same strict confidence as the initial report, continuing under the umbrella of anonymity if anonymity was initially requested.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Please Mention in your new report that it is related to a report or question you previously submitted, preferably including the date on which you made your initial report.

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

You can file a report from any computer that can access the Internet, as well as your mobile phone, using the Hexcel Safe Talk Helpline QR code. You can file from home or any other non-work location. If you don't have access to or are uncomfortable using a computer or a mobile, you can call the Hexcel Safe Talk Helpline toll-free phone number, which is available 24 hours a day, 365 days a year.

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