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About NAVEX Global/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 legal, ethical, and financial issues, as well as other serious misconduct in the workplace.

Why do we need a system like EthicsPoint?

- SC Johnson has always believed in fostering open two-way communication with employees, encouraging everyone who has a concern to speak up.
- We believe leveraging a third party hotline provider to host the SC Johnson Legal Compliance Reporting hotline augments 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. You may file a confidential report via either the telephone or the Internet and do so on an anonymous basis if you choose.

What types of situations should I report?

Employees should report legal, ethical and financial concerns, or any other concerns relating to our Standards of Conduct.

If I see a violation, shouldn't I just report it to my manager or human resources?

When you observe some behavior that you believe violates our Standards of Conduct, we expect you to report it. You can always report any concerns to your manager or 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. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know?

At SC Johnson, integrity is at the core of all we do. Acting with integrity means more than just conducting yourself in an ethical manner – it also means speaking up when others are acting inappropriately. By working together, we can maintain a productive environment and avoid corporate misconduct that can seriously harm the company and our employees.

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.

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 through the 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. The system strips away Internet addresses so that anonymity is totally maintained.

I am concerned that the information I provide to the hotline 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, "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. 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 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?

Speak up and submit a report. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked. Again, you can contact Human Resources or the Law Department, or you can submit your report using the hotline.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

No. SC Johnson has taken measures to ensure that an individual in a hotline report will not have access to the report.

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 on the website or through the call center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative.

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. Mention in the new report that it is related to a report or question you previously submitted.

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

You can file a report to the SC Johnson Legal Compliance Reporting hotline 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 toll-free hotline, which is available 24 hours a day, 365 days a year.