

[About NAVEX Global](#)

[Reporting – General](#)

[Reporting Security & Confidentiality](#)

[Tips & Best Practices](#)

About NAVEX Global

What is NAVEX Global's role?

NAVEX Global is the third-party administrator of the Company's EthicsLine. It provides confidential telephone and web-based options for reporting concerns about knowledge or suspicion of illegal or unethical conduct or violations of business conduct policies.

What is the Heidrick EthicsLine?

The EthicsLine 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 ethical misconduct in the workplace while cultivating a positive work environment.

Why do we have an EthicsLine?

We believe that an effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making within the company. Violation of laws, compliance obligations, or company policies is unacceptable at any level of our company. Your input is imperative to help us protect our company's reputation and financial strength. By creating open channels of communication, we promote a positive work environment and maximize productivity.

Reporting – General

May I report using either the Internet or the telephone?

Yes. You may file a confidential, anonymous EthicsLine report via either the Company's telephone or the Internet.

What types of situations should I report?

The EthicsLine allows individuals to report any violation of our Code of Ethics, or other concern you may have.

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 some behavior that you believe violates our Code of Ethics, we expect you to report it. If you are comfortable doing so, you may bring any concerns forward to your direct manager or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. You may also not know whom to contact, or believe your concern has not been satisfactorily addressed. 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? What's in it for me?

We all have the right to work in a positive and respectful 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.

Does management really want me to report?

We certainly do. In fact, you have an obligation to report any real or perceived violations of the law or a departure from our policies. 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. Offering positive input may also help identify issues that can improve our corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsLine secure server. NAVEX Global makes these reports available only to specific individuals within the company 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.

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

No. The EthicsLine is a positive aspect of our overall philosophy that allows us to ensure a safe, secure and ethical workplace. You are 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.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

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 the EthicsLine 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 EthicsLine website.

Can I file an EthicsLine report from home and still remain anonymous?

A report from any location will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsLine system strips away Internet addresses so that anonymity is fully maintained.

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 EthicsLine 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. In fact, we strongly encourage you to identify yourself because it helps us fully investigate and address any concerns you may raise. This is especially important should there be a need to facilitate an investigation or where additional follow-up is necessary.

Tips & Best Practices

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

One of the Company's bedrock values is to *"Always Act with Integrity."* All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy company. If you are aware of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

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'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

What if I face retaliation?

Heidrick strictly forbids any retaliation against any person who reports a concern. Complaints made in good faith will not expose you to any sanctions, regardless of whether the underlying facts prove to be correct or result in any corrective action. If you believe you have faced retaliation of any kind, please report it so that the company can investigate.

What if my boss or other managers are involved in a violation? Will they receive a copy of the report?

The EthicsLine system and report distribution process 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 at the EthicsLine site or through the EthicsLine Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the EthicsLine system again at any time either by Internet or telephone 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 company questions. 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 Ethicsline correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

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 an EthicsLine 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 EthicsLine toll-free hotline, which is available 24 hours a day, 365 days a year.

What if I have an emergency?

Concerns about an immediate threat of physical harm or damage to property should not be reported to NAVEX Global. If you require emergency assistance, please contact your local emergency services.