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About the NFI Employee Hotline

What is the NFI Employee Hotline?

Our NFI Employee Hotline is a confidential reporting tool through NAVEX Global (EthicsPoint) that enables management and employees to work together if any employee experiences something that does not align with NFI's values and policies.

Why do we need an Employee Hotline?

- Our employees are our most important asset. By creating open channels of communication and an employee hotline, we promote a positive work environment and maximize productivity.
- An effective reporting system furthers our efforts to foster a culture that embraces a family environment with integrity, social responsibility, safety, and teamwork at the center.

Reporting – General

May I report using either the Internet or the telephone?

Yes. Our NFI Employee Hotline enables you to file a confidential, anonymous report via phone (877-618-7897) or web (<http://nfiindustries.ethicspoint.com/>). You may also access this website via your mobile smart phone.

What types of situations should I report?

With the NFI Employee Hotline, you may report any actual or suspected misconduct or concerns relating to our Code of Conduct, Positive Employee Relations Policy, Safety Policies and Procedures, or other concerns you may have.

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

When you observe behavior that you believe violates our policies or procedures, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, other members of our management team, or a member of Human Resources. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. That is why we have partnered with NAVEX Global to offer this employee hotline. 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 environment and with that right comes the responsibility of acting with integrity for the good of the team and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Violations of our policies and procedures can threaten the existence of the entire company.

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. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly from the NFI Employee Hotline to the EthicsPoint secure server. NAVEX Global makes these reports available only to specific individuals within the company (typically the Human Resources, Safety and Security teams) 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 and to work to resolve any issues brought forward.

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

No. The NFI Employee Hotline is a positive aspect of our culture that allows us to ensure a safe, secure, and ethical workplace. You are encouraged to seek guidance on any issues you are experiencing, 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 NFI Employee Hotline 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 NFI Employee Hotline's secure website. Many people choose this option, as NAVEX Global'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 NFI Employee Hotline system through EthicsPoint strips away internet addresses so that anonymity is totally maintained.

I am concerned that the information I provide to the NFI Employee Hotline will ultimately reveal my identity. How can you assure me that will not happen?

The NFI Employee Hotline system through EthicsPoint 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, "I drove a run from Nazareth to New Jersey on January 5 in truck number 345."

Is the telephone toll-free hotline 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 NFI Employee Hotline website. These reports have the same security and confidentiality measures applied to them during delivery. The phone is not answered by an NFI employee.

What if I want to be identified with my report?

Great, it is really helpful when people identify themselves, so we can ask them for follow-up information (when needed). There is a section in the report to identify yourself, if you wish.

Tips & Best Practices

I am aware of some individuals who have violated NFI policy, but it doesn't affect me. Why should I bother reporting it?

Our company promotes integrity and ethical behavior. All conduct that violates our policies and procedures, at any level, ultimately hurts the company and all employees, including you. If you know of any incidents of misconduct, safety violations, or ethical violations, consider it your duty to yourself and the rest of your coworkers in the NFI family 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. The NFI Employee Hotline 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 policy violations and/or unethical behavior go unchecked.

What if my boss or other managers are involved in a violation? Won't they get the report and try to hide the issue?

The NFI Employee Hotline and report distribution ensures that any people mentioned 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 NFI Employee Hotline via phone or web, 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. 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 NFI Employee Hotline 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 NFI Employee Hotline report from any computer or smartphone 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 or smartphone, you can call the toll-free hotline, which is available 24 hours a day, 365 days a year.