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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX that enables management and employees to work together to address fraud, abuse, and other alleged 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.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- An effective reporting system enhances all our efforts to foster a culture of integrity and ethical decision making.

# Reporting – General

## May I report using either the internet or the telephone?

Yes. EthicsPoint enables you to file a confidential, anonymous report via either the telephone or the internet.

## What types of situations should I report?

The EthicsPoint system allows you to report any violation of our stated Code of Conduct and Business Ethics, or other concern you may have, including but not limited to the following:

- Accounting, financial and/or auditing concerns
- Bribery, corruption, or illegal payments
- Conflicts of interest
- Discrimination, harassment, retaliation, or other misconduct
- Inaccurate financial records
- Insider trading
- Theft or fraud
- Workplace bullying or violence
- Any criminal conduct or violations of the law

## 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 some behavior that you believe violates our Code of Conduct and Business Ethics, we expect you to report it. Ideally, you should 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 way. In those instances, our partnership with NAVEX lets you report anonymously rather than keep the information to yourself.

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

Each of us is accountable for upholding the Company's commitment to our ethical standards. This commitment goes beyond just following laws and regulations, and also requires us to speak up if we see something that violates our Code. Corporate misconduct can threaten the livelihood and very existence of our entire company, but by working together and speaking up when something is not right, we will maintain a healthy and productive environment..

## 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. Therefore, your reporting can minimize the potential negative impact on our Company and our people.

**Where do these reports go? Who can access them?**

Reports are logged directly on the EthicsPoint secure server. NAVEX makes these reports available only to specific individuals within our Company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients is trained to keep these reports in the utmost confidence.

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

No. EthicsPoint is a reporting tool that only triggers action when employees like you report a concern. It is one of the positive ways we can support our employees and meet our compliance obligations while reinforcing our philosophy of ensuring a safe, secure, and ethical workplace.

# 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 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'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.

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

Our company promotes ethical behavior. 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 know 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 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 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 at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the EthicsPoint 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 TrueBlue have now 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 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 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, which is available 24 hours a day, 365 days a year.