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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX that enables management and team members to work together to address potential fraud or other misconduct in the workplace while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- Having a third-party anonymous reporting line is part of sound governance practices and are required for publicly traded companies, such as the Oppy related company, Dole PLC.
- Creating multiple open channels of communication, helps us promote a positive work environment.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

What types of situations should I report?

The EthicsPoint system allows employees to report any violation of our stated Code of Conduct, or other concern you may have.

If I am concerned about a policy violation, where ideally should I report it first?

If you observe behavior that you believe violates our code of conduct, we expect you to voice your concerns through the appropriate escalation channels. Ideally, you should bring any concerns forward to your direct manager, any other member of our management team, or Talent & Culture. We recognize, however, that there may be circumstances when you may not be comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with NAVEX. We would rather you report anonymously than keep the information to yourself.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. NAVEX 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. EthicsPoint 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 tool enhances 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 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.

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...".

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 an individual acting unethically, but it doesn't affect me. Why should I bother bringing it up?

Our company promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all team members, including you. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to bring it up to Oppy leadership or through this reporting mechanism.

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?

Contact Talent & Culture or a trusted leader to inquire, if you feel comfortable doing so. This is always the best first step to understanding policies better. If you wish, you can file a report, 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, 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 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 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.