



Question and Answer: Ethics Point and the AFS Compliance Hotline

- **What is Ethics Point?**
 - Ethics Point is a comprehensive and confidential reporting tool created by NAVEX that enables management and team members to work together to address fraud, abuse and other suspected misconduct in the workplace while continuing to cultivate the positive work environment we have worked so hard to achieve.

- **Why do we need a system like Ethics Point?**
 - By creating open and different channels of communication, we continue to promote a positive work environment for our most important assets, our team members.
 - Ethics Point is another tool we can use for reporting systems. It helps us with our efforts to foster the culture of integrity and ethical decision-making.

- **Is Ethics Point my only means to report fraud, abuse, or misconduct?**
 - No, you can still report information to your supervisor, their supervisor or HR. The information will be directed to Ethics Point as we will want to have a record of your report.

- **If I can still use the current reporting system, why would I want to use Ethics Point?**
 - We recognize there may be circumstances when you are not comfortable reporting the issue through current reporting systems. It is for such cases that we have partnered with NAVEX. We would rather you report through this means than keep the information to yourself.

- **How can I use Ethics Point?**
 - You can use multiple means to utilize Ethics Point, including the phone and internet.

- **What kind of situations should I report?**
 - The Ethics Point allows team members to report any violation to our code of conduct, compass for excellence or our company policies.

- **Why should I report what I know? What's in it for me?**
 - We all have the right to work in a positive and safe environment. With that right comes some responsibility. If you see something or know of something that isn't right, you need to report it. Misconduct creates an unhealthy environment and depending upon the severity of the situation can threaten the existence of a company.
 - Our company promotes ethical behavior. At any level all unethical conduct ultimately hurts the company and all team members including you.



- **Does Associated Food Stores really want me to report misconduct?**
 - Yes, we need you to report. You may know something we are unaware of. If we don't know we can't work to help fix the problem. Your reporting can help to minimize the potential negative impact on the company and our team members. Remember, offering constructive input may help us improve performance, ultimately helping to maintain a safe working environment and a positive culture.

- **If I choose to report through NAVEX who has access to the reports?**
 - Reports are 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 have been trained and will keep the information confidential. Under no circumstances will an individual named in a complaint involving alleged wrongdoing, be involved in investigating or reviewing the complaint.

- **You say this is confidential, can I remain anonymous if I make a report?**
 - Yes, you may if you so choose to.

- **How does this remain confidential in today's world with all the ways put in place to identify me?**
 - NAVEX does not generate or maintain any internal connection logs with Ip addresses, so no information linking your PC (work or home) is available.
 - An internet portal never identifies a visitor by screen name and the Ethics Point system strips away Internet addresses to maintain anonymity.
 - Ethics Point system protects your anonymity; however, you need to ensure that body of the report doesn't reveal your identity by accident.

- **I know there may be follow up information needed if an investigation is required. How do I remain anonymous while helping provide more information to help my company?**
 - All cases are assigned a unique randomized number called a "report key" and you create the password for this report key. You will use the report key and password to follow upon your report or to help us with the investigation without revealing your identity.

- **Will every report be taken seriously?**
 - Yes, Associated Food Stores takes all reports seriously. We will investigate everything to the best of our ability. Because we will investigate, we need you to provide as many facts as possible to help us come to the proper conclusion.

- **What if I want to be identified with my report, is that possible or this only anonymous?**
 - Yes, you can be identified. We will be happy to work with you to help resolve the violations or misconduct.



- **I am unsure if what I have observed or heard violates company policy or involves unethical conduct. What should I do if it just doesn't look or feel right?**
 - When in doubt file a report. This system is set up to help you prepare and file a report. We would rather you report a situation that turns out to be harmless than let a possible unethical behavior go unchecked, hidden or fester.

- **What if my supervisor or manager is the violator? Will they see the report and begin a cover-up?**
 - The Ethics Point system and report distribution ensures implicated parties are not notified or granted access to the reports.

- **Is there ever a case that my supervisor or manager will know about the violation?**
 - Yes, they may be questioned in the investigation.

- **If they are questioned in the investigation, will I be brought up?**
 - We will always do our best to keep investigations anonymous if the team member has requested to remain anonymous. The team members being investigated and questioned may find out about the situation based on questions asked of them even though no names will be used. Our company has a very strict zero tolerance policy for retaliation and would expect our team members to adhere to the policies that have been put in place.

- **What if I feel like I am being retaliated against?**
 - This should too be reported immediately, by any means that you feel comfortable reporting the situation.

- **What if I want to add to my report after I have submitted it?**
 - You can return to the system to access the original report any time simply use your report key and pass code.

- **Do I have to return to the report once I have originally entered it?**
 - Yes, we ask you return to the site.
 - We may have questions that need to be answered.
 - We want you to monitor the progress on your case.

- **Will I still remain anonymous if I return to the site to answer questions?**
 - Yes, you will.



- **What if I forget my report key and or the passcode?**
 - Due to our commitment to your anonymity and to ensure that security and confidentiality we will not be able to help you with that. You will need to submit a new report. Please mention this new report is connect to a previous report and we will do our best to ensure the information is connected to the originally report.