

Staples EthicsLink - Frequently Asked Questions (Log on @ www.staplesethicslink.com)



What is Staples EthicsLink?

Staples EthicsLink is our ethics and compliance helpline. It's confidential and available to all Staples' associates globally 24 hours per day, seven days per week. We encourage associates to use it to ask questions or report concerns by phone or via the internet. A third party, EthicsPoint, Inc., runs the helpline. The system is designed to promote a high level of confidentiality. Questions or concerns you submit can only be reviewed by people on the Ethics team. The system cannot trace reports back to you unless you decide to identify yourself.

What types of issues should I raise?

You may use Staples EthicsLink to ask a question about how to handle a situation under our Code of Ethics or to report a concern about potential legal, ethical, or policy violations. Here are the categories:

- Accounting & auditing
- Bribery
- Conflict of interest (including gifts and entertainment)
- Discrimination or harassment
- Falsification of records
- Fraud
- Privacy & information management
- Misuse of company assets
- Retaliation
- Securities & insider trading
- Unfair competition & antitrust
- Unlawful activity or Code of Ethics violation

**** European Associates have different regulations involving which issues they can raise to the ethics helpline, Staples EthicsLink.**

Because of European data privacy regulations, associates in Europe may only use Staples EthicsLink to report matters involving:

- Accounting
- Bribery
- Fraud
- Financial Irregularities
- Other issues of vital interest

How do I use the Staples EthicsLink website to ask a question or report a concern?

1. Select "Ask a Question" or "Report a Concern" from the homepage at www.staplesethicslink.com
2. Select the "Issue Type" that best describes what you want to report (see the list above)
3. Fill out the online form and follow the instructions provided

What can I expect when I log on to Staples EthicsLink?

The Staples EthicsLink Web site walks you through the entire process. It presents questions, offers dropdown menus, and has text boxes for you to type in specific details about your questions or concerns. You should also be prepared, if you are willing, to provide the names of witnesses of any alleged misconduct to increase the success of an investigation into your complaint. After you supply all the necessary information, the system will assign you a Report Key. Next you will be asked to create a personal password for this particular question or concern. Keep this information in a safe place because you will need it to use the "Follow-up" feature to check on the status of your report at a later time.

Will I be required to share my name with Staples EthicsLink?

You do not have to tell us your name or provide your employee ID number. However, if you do choose to remain anonymous, it may not be possible for the company to carry out a full investigation. We encourage you to identify yourself so that we can follow up on your questions or concerns as promptly and thoroughly as possible. You're safe. Remember, it's against Staples' policy to punish or retaliate against an associate who has raised a good faith ethics or compliance concern.



What happens when I call the Staples EthicsLink phone number?

You'll speak with a call center specialist employed by EthicsPoint, Inc., the third party that administers Staples EthicsLink. This person will capture your question or report, asking you to provide detailed information. You may choose to remain anonymous, however, doing so may limit a full investigation of the matter. Therefore, we encourage you to identify yourself. You should also be prepared, if you are willing, to provide the names of witnesses of any alleged misconduct to increase the success of an investigation into your complaint. Once you are finished, the specialist will notify Staples' Ethics team in the U.S. of the new question or concern. The EthicsPoint call center specialist cannot provide you advice or resolve your issue over the phone. If your matter is urgent, s/he will provide you with information to contact the Ethics team directly so you can receive immediate assistance. The call center specialist will provide you with a Report Key and password for you to access the follow-up on your report after five business days.

Where will my question or concern go after I submit it to Staples EthicsLink?

Shortly after you submit a report to, or call, Staples EthicsLink, the helpline system automatically will send an email to Staples' Ethics team in the U.S., led by our VP Business Ethics. This email prompts the Ethics team to review your report by logging onto the vendor's password-protected site. Typically, this initial review occurs within 24 hours after you submit a report to the helpline.

How does the Ethics team handle new Staples EthicsLink reports?

Staples' policy is to address and resolve all questions and concerns reported to Staples EthicsLink as promptly, professionally, and as confidentially as possible. The Ethics team helps ensure compliance with this important policy by reviewing each new helpline report within 24 hours and then assigning all ethics-related questions and concerns to appropriate subject-matter experts for follow up. Depending on the circumstances, the VP, Business Ethics may handle a helpline question or concern directly or, where appropriate, assign it to other subject-matter experts in Human Resources, Internal Audit, Legal, and/or Loss Prevention. No matter which team handles a particular ethics or compliance concern, every report to Staples EthicsLink is monitored by the VP, Business Ethics to ensure that adequate follow up occurs and that, where potential violations are found, the company takes appropriate disciplinary and/or corrective action.

How does the follow-up feature work and when should I use it?

Approximate five business days after you submit a report to Staples EthicsLink, you may check its status, by using the "Follow Up" tab on the Web site. When you go in, you see that we need additional information to process your concern or question. As long as the report is active, both you and the company can post information and confidentially ask question. If you want to add new information about your report, use the follow-up feature. Simply click on the "Follow Up" tab on www.staplesethicslink.com, or call the toll-free number, and then provide your unique Report Key and password. Following up is particularly important if you choose to be anonymous because in that case we have no other way to communicate with you.

What should I do if I lose my Report Key or password?

Because of the high level of confidentiality that is maintained for reports, if you lose your report key or password, you will be required to file a new report. You can mention in the new report that this matter relates to another report you supplied earlier.