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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX that enables management, employees and third parties to work together to address fraud, abuse, and other misconduct (including irregularities of the law (as defined by the Polish Whistleblowers Protection Act)) 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.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

CMC employees and third parties (including, but not limited to, vendors, former employees and spouses of employees) may file a confidential, anonymous report via the telephone using the hotline applicable to their jurisdiction. CMC employees and third-parties for our Poland operations may file a confidential, anonymous report via either the telephone hotline for Poland or through the EthicsPoint interface on the Internet.

Is the EthicsPoint whistleblowing platform by NAVEX for employees only?

No, the Ethics Point whistleblowing platform by NAVEX can be used by anyone with knowledge of the irregularity, including, but not limited to, employees, former employees, pensioners, principals, contractors, or customers.

What types of situations should I report?

The EthicsPoint system allows employees and third parties to report any violation of or irregularities with our stated Code of Conduct, any CMC policy, any applicable laws or regulations, 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 some behavior that you believe violates our Code of Conduct, we expect you to report it. You may report any concerns to your direct supervisor or any other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with NAVEX to make available anonymous methods of reporting through the EthicsPoint system. 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 in an ethical manner and letting the appropriate people know if someone is not acting appropriately. Corporate misconduct can threaten the very existence of an entire company. Reporting a violation, or suspected violation, can reinforce an ethical atmosphere and positively influence the conduct of other employees and third parties.

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 on the EthicsPoint secure server. NAVEX makes these reports available only to specific individuals within the Company who are charged with investigating 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 and a place for ethical business. 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 is a great tool to enhance that communication.

We have carefully chosen a reporting tool that meets our compliance obligations while also maintaining a positive reporting environment.

Reporting Security & Confidentiality

How can I report irregularities described in the Code of Conduct?

Ethical issues described in the Code of Conduct can be reported via a dedicated anonymous Ethics on-line hotline.

Can I file a report from home and still remain anonymous?

All reports, no matter where they originate, will remain secure and anonymous.

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..." .

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.

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked a series of questions regarding the details of the incident you are reporting, such as which CMC location this incident occurred, or is alleged to have occurred, at, who was involved in the incident being reported, etc., and an interviewer will type your responses into the EthicsPoint site. These reports are secure and handled with the utmost confidentiality.

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 incidents of misconduct, ethical violations, or violations of any applicable laws or regulations, you have an obligation 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, 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 the Company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

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.

When can I file a report using EthicsPoint?

You can file an EthicsPoint report at any time as the EthicsPoint toll-free hotline is available 24 hours a day, 365 days a year.

What is the Ethics on-line platform used for?

The Ethics on-line platform is a special dedicated anonymous online tool for reporting irregularities of the law (as described in the Polish Act on protection of persons reporting breaches of the law dated[data]).

Is the whistleblowing Ethics on-line platform for employees only?

No, the whistleblowing Ethics on-line platform can be used by anyone with knowledge of the irregularity. An employee, a former employee, a pensioner, a principal, a contractor, a customer.

Who can report violations under the Polish Act on protection of persons reporting breaches of the law dated[data] ?

Anyone with knowledge of the irregularity, employees, former employees, principals, suppliers, customers, trainees,

Will I have the protection afforded to whistleblowers (under the Polish Act on protection of persons reporting breaches of the law dated[data]) every time I make a report on the EthicsPoint platform?

No, the Polish Act on protection of persons reporting breaches of the law dated[data] defines the procedure, the protection and which areas can be reported under this law.

What breaches can I report under the the Polish Act on protection of persons reporting breaches of the law dated[data] ?

According to the draft law, a breach of the law is an illegal action concerning:

- 1) public procurement;
- 2) financial services, products and markets;
- 3) prevention of money laundering and financing of terrorism;
- 4) product safety and compliance;
- 5) transportation safety;
- 6) environmental protection;
- 7) radiological protection and nuclear safety;

- 8) food and feed safety;
- 9) animal health and welfare;
- 10) public health;
- 11) consumer protection;
- 12) protection of privacy and personal data;
- 13) security of networks and information and communication systems;
- 14) financial interests of the treasury of the Republic of Poland, local government unit local government and the European Union;
- 15) the internal market of the European Union, including public-legal principles of competition and state aid and corporate taxation.

So where can I report other violations and non-compliance with the code of conduct?

To report other violations and non-compliance with the Code of Conduct, use the NAVEX HOTLINE by EthicsPoint.

What is the difference between the Ethics on-line platform and the Ethics HOTLINE ?

The Ethics on-line platform is used for anonymous whistleblowing in accordance with the Polish Act on protection of persons reporting breaches of the law dated[data] Reports can be made by anyone who has knowledge of the infringement.

The Ethics Hotline, on the other hand, serves to report violations arising from the internal CMC Code of Conduct. It can be used by CMC employees.