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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX to help management and employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

### Why are we changing vendors?

THG routinely evaluates vendors for efficiency and relevance. It was determined that switching our employee hotline reporting system over to Navex would better meet our long term needs with ethics and compliance reporting. The Navex tools will enable the user to more easily report concerns and for the leadership team to more effectively analyze and respond to process, procedure, or training changes that will keep our employees and the company as a whole progressing together in a safe and efficient manner. Navex allows our investigators to converse with those reporting in an anonymous manner, both via phone or online.

### 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 will augment our other efforts to foster a culture of integrity and ethical decision-making.

# Reporting – General

## May I report online or by phone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or online.

## What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our stated Code of Business Conduct and Ethics, or other concern 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. 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 manner. It is for such circumstances that we have partnered with NAVEX. 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. By working together, we can maintain a healthy and productive environment. Because corporate misconduct can threaten the very existence of an entire company, you just might be protecting your own livelihood.

## 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 constructive 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 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.

## 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, and won't this log identify me as a 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, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as NAVEX'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.

**\*Important Note:** Please know that there could be some instances where we need to contact you for more detailed information. In those cases it is very important that you continue to check back in on your report status to see if there are new notes or questions until the case is resolved.

**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 is designed to protect your anonymity. However, if you wish to remain anonymous, try 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...".

Also, because your anonymity means we have no contact information for you,

it is very important that you check back in on your claim (online or via phone) for any updates or questions we might need to ask. We also hold everyone to our 'no retaliation' policy and want you to be comfortable bringing any issues to our attention.

**Is the telephone toll-free hotline confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an online report and an interviewer will type your responses into the EthicsPoint website. These reports have the same security and confidentiality measures as an online report would.

**What if I want to be identified with my report?**

There is a section in the report for identifying 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 seemingly harmless lapse in ethics can have on an otherwise healthy company. So 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 are designed so 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 with EthicsPoint, 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 online or by phone 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.

### **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.