

Frequent Questions & Answers

[About EthicsPoint](#)

[Reporting – General](#)

[Reporting Security in a Secure and Confidential Manner](#)

[Tips and Best Practices](#)

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool to assist management and employees to work together to address concerns related to fraud, internal controls, accounting or auditing matters and other workplace misconduct, all while cultivating a positive work environment. EthicsPoint also allows shareholders, customers, service providers and others to report situations or share concerns related to fraud, accounting, auditing or other matters.

Why do we need a system like EthicsPoint?

- Publicly traded companies are required by law to have an anonymous reporting vehicle to address concerns related to accounting, internal controls and auditing matters directly to the Audit Committee.
- In addition, we believe that our employees are our most important asset. Creating open channels of communication allows us to 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.
- Moreover, making this communication channel available to shareholders, customers, service providers and others allows us to foster transparency and trust in our relationship with them.

Reporting – General

May I report using either the Internet or the telephone?

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

What type of situations should I report?

The EthicsPoint system is designed for employees, shareholders, customers, service providers or others to report any violation of our Code of Ethics, or other concerns they may have.

If I am an employee of the Company and become aware of a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you become aware of any behavior that you believe violates our Code of Ethics, 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 EthicsPoint. We would rather you report anonymously than keep the

Frequent Questions & Answers

information to yourself. Please be mindful that our Code of Ethics requires us to promptly raise concerns related to any behavior that may represent a threat to the Company or a violation of our ethical standards. Failure to report actual or potential violations is in itself a violation of the Code.

If I am an employee of the Company, 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. Corporate misconduct can threaten the livelihood of an entire company.

If I am an employee of the Company, 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, by offering your input through the EthicsPoint system you may help identify issues that can improve corporate culture and performance.

If I am not an employee of the Company, why should I report what I know? What's in it for me?

If you are one of our shareholders, customers, service providers or are otherwise related to us, we encourage you to share with us any concern or suspicion of improper conduct you may have so that we may take any actions that allow us to remedy the situation and improve our processes and procedures. In addition, your reporting may allow us to identify issues that may threaten the Company and take any preventive or mitigating measures.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint 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.

If I am an employee of the Company, isn't this system just an example of someone watching over me?

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate concerns. Effective communication is critical in today's workplace and this is a great tool to enhance that communication. We have carefully chosen a great reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Frequent Questions & Answers

Reporting in a Secure and Confidential Manner

As an employee of the Company, it is my understanding that any report I send from a Company computer generates a server log that shows every website that my computer connects with, and won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work computer, you have the option of using a computer outside your work environment through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

May 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, unless you choose to identify yourself. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide to 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, 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..."

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

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint system. These reports have the same security and confidentiality measures applied to them during delivery.

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 involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Our Company chooses to promote 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 past 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?

Frequent Questions & Answers

File a report. EthicsPoint 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 because you weren't sure.

If I am an employee of the Company, what if my boss or other managers/executives 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 via EthicsPoint, you receive a unique user name and are asked to choose a password. You may return to the EthicsPoint system again (either by Internet or telephone) and access the original report to add more details, answer questions posed by a Company representative or add further information that will help resolve open issues. 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 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, if you have chose to remain anonymous.

May I still file a report if I don't have access to the Internet?

You may file an EthicsPoint report from any computer with Internet access. You may file from home or from any other location. If you don't have access or are uncomfortable using a computer, you may call the EthicsPoint toll-free at 866-737-6813 from Puerto Rico or the United States or 866-737-6850 (preceded by the country's long distance code) if you are elsewhere. The hotline is available 24 hours a day, 365 days a year.