

[About EthicsPoint](#)

[Reporting – General](#)

[Reporting Security & Confidentiality](#)

[Tips & Best Practices](#)

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX to assist Gates management and its employees to work together to address potential fraud, ethical issues, and other types of misconduct in the workplace, while cultivating a positive work environment.

Why does Gates need a system like EthicsPoint?

- Gates believes that our employees are our most important asset. By creating open channels of communication, we strive to promote a positive work environment and to maximize productivity.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.
- Many companies are required by law to have an anonymous reporting process to address potential accounting and auditing fraud directly to the company's audit committee of its board of directors.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential report – either by name or anonymously – through either the telephone or the Internet.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of Gates' Code of Business Conduct and Ethics, other Gates policies or processes, or any other concerns you may have.

If I see a violation, shouldn't I just report it to my manager or human resources and let them deal with it?

When you observe behavior that you believe violates Gates' Code of Conduct, we expect you to report it. Our Code of Conduct actually obligates you to report it. Ideally, you should bring any concerns forward to your direct manager or another member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue through your management. It is for such circumstances that we have partnered with EthicsPoint. Gates would rather you make a report anonymously, than to not report at all.

Why should I report what I know? What's in it for me?

All Gates employees have the right to work in a positive environment, and with that right comes the responsibility of acting in an ethical manner. By working together, in accordance with our Code of Conduct and corporate policies, we can maintain a healthy and productive work environment.

Does Gates 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 knowledge of an activity that may ultimately, if left unaddressed, be a significant cause for concern for Gates. Your reporting can minimize the potential negative impact on the company and our people. Your report may also 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 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, and determining if and how an investigation should be conducted. Each of these report recipients has had significant training and will keep these reports in the utmost confidence.

Isn't this system just an example of Gates watching over me?

Gates' EthicsPoint system is a positive aspect of our overall corporate philosophy of "doing business right", and it allows us to promote a safe, secure and ethical workplace. You are encouraged to seek guidance on ethical dilemmas or communicate a concern through EthicsPoint. Effective communication is critical in today's workplace, and this is a great tool to enhance Gates' ability to communicate with you.

We have carefully chosen what we feel is the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security & Confidentiality

It is my understanding that any report I send from a Gates computer generates a server log that shows every web-site that my PC 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 PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity, if the reporter chooses to remain anonymous.

If you feel uncomfortable making a report on your Gates 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 employees choose this option, as EthicsPoint'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 your 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. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity if the reporter chooses to remain anonymous.

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 Web site. These reports have the same security and confidentiality measures applied to them during delivery to the designated personnel in the company.

What if I want to be identified with my report?

There is a section in the report for identifying yourself if you wish to do so.

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?

Gates chooses to promote ethical behavior. All unethical conduct, at any level, ultimately negatively impacts some part of the company and its 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 any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it. Our Code of Conduct requires it.

I am not sure if what I have observed or heard is a violation of Gates' policy or involves unethical conduct, but it just does not look right to me. What should I do?

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. Gates will evaluate your report thoroughly and will gather the facts. Leave it to us to determine whether there is an issue that needs to be addressed.

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 Gates has further questions for me concerning my report?

When you file a report at the EthicsPoint website or through the EthicsPoint call center, you receive a unique 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, provide new or additional information, or answer questions posed by a Gates representative. We strongly suggest that you return to the site in the time specified to answer any questions from the company. By making a report, EthicsPoint allows you and Gates to enter into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint communications are held in the same strict confidence as the initial report, and continue under the umbrella of anonymity if they began that way.

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

Yes. . If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year. However, you can also file an EthicsPoint report from any computer that can access the Internet. Many public locations, including the public library, have Internet computers.