



Q & A

Q. Why do we need a reporting system like Ethicspoint®?

There are several reasons why we need a reporting tool:

1. We believe that you are our most important asset and by using this tool, we hope to ensure that our financial representation is accurate and there are no questionable transactions or entries, and it will assist us to address any misconduct incidents promptly and effectively.
2. Reporting “hotlines” have in the past proven to be an effective tool in reducing losses from financial, accounting and auditing misconduct and fraud, and therefore can help to protect our Company’s financial strength.

Q. Does management really want me to report?

We *need* you to report things. You experience first hand what is going on in our Company – both good and bad. You may have knowledge or suspicion of an activity that may be cause for concern. Your reporting can minimize the potential adverse impact on the Company and our associates, and may help identify issues that can improve our corporate culture and performance.

Q. Why should I report what I know? What’s in it for me?

We all have the right to work in a positive environment. To do so, people need to take responsibility and act in an ethical manner and that includes letting the appropriate people know if someone is not acting appropriately. By working together we ensure and maintain a healthy and productive environment. Corporate misconduct, if not reported and addressed promptly, can threaten our entire Company.

Q. What type of situations should I report?

Ethicspoint® is a communications tool providing an avenue for sharing information that addresses all aspects of misconduct. Please see the attached violation page from the Ethicspoint web site for a detailed description of the types of misconduct that should be reported.

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

You certainly can, but there are several good reasons why you should use Ethicspoint® as well. First, Ethicspoint ensures that your report gets to the appropriate people. That may or may not happen if you simply report something to your manager, especially when dealing with issues not under his/her control. More importantly, **reports can be filed anonymously and all report information is secure and held in the strictest confidence.**

Q. What if someone uses the Hotline to make a malicious or false report?

Malicious reporting, or knowingly filing a false report, is a violation of the firm's Code of Conduct and associated firm policy. Those who violate the Company's standards, regardless of title or tenure, may be subject to disciplinary action, up to and including termination of employment or partnership resignation.

Q. May I report utilizing either the Internet or the telephone?

Yes you may. By giving you choices, Ethicspoint helps ensure that you can file a report anonymously and in the manner most comfortable and convenient for you.

Q. Can reports be filed in a language other than English?

Both Hotline telephone and Web-based reports may be filed in any language, however, the Web-based questions appear in English. Telephone reports may require the use of a third-party translator, who will assist you and the Hotline operator during your call.

Q. It is my understanding that any report I send from a Company 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.

If you have concerns, please report from a home computer, your friend's house or use the telephone option.

With fewer than 25% of reports generated during business hours, most people prefer to report from the comfort of their home after hours and on the weekend using either the telephone or the Internet.

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

A report from home, a friend's computer or any Internet portal is totally secure and will maintain your anonymity. An Internet portal never identifies a visitor by screen name and the Ethicspoint system strips away IP addresses so that anonymity is totally maintained. Additionally, both the Company and Ethicspoint have committed not to pursue a reporter's identity. The Ethicspoint telephone system does not utilize caller ID or any system to capture the incoming number.

Q. 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, you as the reporting party need to ensure that the body of the report does not reveal your identity by accident, for example, "From my desk next to Peter Wong..." or "In my 33 years...".

Q. I am not sure that something I observed or heard is a violation of Company policy, but it just does not look right to me. What should I do?

File a report. Ethicspoint® will help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turned out to be harmless than let possible unethical behavior go unchecked because you were uncertain.

Q. Where do these reports go? Who can access them?

Reports are entered directly on the Ethicspoint secure server, by the Ethicspoint telephone specialist or the Internet reporter 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 type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence. The Ethicspoint® system and staff are trained and committed to ensure that no report is ever shared with implicated parties, their peers, or subordinates.

Q. 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 dispatchers are designed and trained so that no report is ever shared with implicated parties, their peers, or their subordinates. Additionally, copies of all reports are sent to the Group Managing Director and the Chairman & CEO of Omega. This will help to eliminate cover-ups by **any** implicated individual.

Q. What if I remember something important to the incident after I filed the report? Or what if the Company has further questions for me concerning my report?

When you file a report at the Ethicspoint Web site or via our international toll-free number, you receive a unique user name and are asked to choose a password. You can return to the Ethicspoint system again either by Internet or telephone to access the original report, answer questions posed by the Company representatives and add further information that would help resolve the open issues. We strongly suggest that you return to the site in 48 hours 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.

Please see "How to File a Report" to understand how this process works.

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

All Ethicspoint correspondence is held in the same strict confidence as the initial report, and the umbrella of anonymity is always maintained.

Q. If I want to be identified with my report, can I do so?

Of course. There is an "opt-in" section in the report in which you may identify yourself, if you so desire.

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

You can file an Ethicspoint® report from any computer that can access the Internet. For example, many public locations, including the public library and internet cafés, have Internet computers. If you don't have access or are uncomfortable using a computer, you can call the Ethicspoint hotline for your country, which is available 24 hours a day, 365 days a year.

Q. 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, confidentiality and anonymity measures applied to them as the internet-based reporting system.