Integrity hotline

FAQ's

About Integrity hotline

Integrity hotline is a comprehensive and confidential reporting tool to assist management and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After 5-6 business days, use your report key and password to check your report for feedback or questions.

This is not an Emergency Service:

Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

Why do we need a system like Integrity hotline?

– We believe that our employees are our most important asset. By creating open channels of communication, we can 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.

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2/ An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

Commonly asked questions

Q. **May I report using either the Internet or the telephone?**

A. Yes. With Integrity hotline, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

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

A. 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 created the Integrity hotline. We would rather you report anonymously than keep the information to yourself.

Q. **Does management really want me to report?**

A. 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.

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

A. 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.

Q. **What type of situations should I report?**

A. The Integrity hotline system is designed for employees to report any violation of our stated Code of Conduct, or other concern you may have.

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

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

Q. **Isn't this system just an example of someone watching over me?**

A. The Integrity hotline 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 a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

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

Reporting security & confidentiality

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?**

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

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 Integrity hotline secure website.

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

A. Yes. 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 Integrity hotline system strips away Internet addresses so that anonymity is totally maintained. Plus, Integrity hotline is contractually committed not to pursue a reporter's identity.

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

A. 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 Integrity hotline Web site. These reports have the same security and confidentiality measures applied to them during delivery.

Q. **I am concerned that the information I provide Integrity hotline will ultimately reveal my identity. How can you assure me that will not happen?**

A. The Integrity hotline 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 John Smith…" or "In my 33 years…".

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

A. There is a section in the report for identifying yourself, if you wish.

Tips & best practices

Q. **I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?**

A. 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 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 co-workers to report it.

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

A. All Integrity hotline correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

Q. **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?**

A. File a report. Integrity hotline 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.

Q. **What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?**

A. The Integrity hotline system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

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

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

Q. **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?**

A. When you file a report at the Integrity hotline Web site or through the Integrity hotline Call Center, you receive a unique user name and are asked to choose a password. You can return to the Integrity hotline system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and 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 also be resolved, no matter how complex.

CIL Corporate Code Committee
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Chief Audit Officer (or delegate)
Global Head of Compliance (or delegate)
Chief Human Resources Officer (or delegate)
Chief Legal Counsel (or delegate)

CIL "Integrity hotline"
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Employees and Stakeholders

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