

Raising Concerns

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Raising Concerns

Who can I talk to about concerns or to report an alleged violation of the Code of Business Conduct?

To the persons as stated in the Code of Business Conduct and to the Legal Compliance Officer directly. Additionally, you have also the ability to file a confidential, personal or anonymous report via either this web site or by telephone. Using the hotline, you will be asked to provide the same information that you would provide in the online report and an interviewer will type your responses into the same system.

In which languages may I report?

You can report in any of the Siegfried languages, but please note that the online intake form is in English only. Translators will be provided whenever you report by phone and the operator does not speak the same language(s) as you do.

What types of potential misconduct should I report?

The reporting system is designated for all Siegfried employees, as well as third-parties (customers, vendors, and other persons doing business with Siegfried), to report any alleged violations of applicable laws, rules or regulations as illustrated in our Code of Business Conduct accurately and truthfully, as well as to ask guidance thereto, subject to specific national privacy requirements.

If I see an alleged violation what should I do?

When you observe some behavior that you believe violates our Code of Business Conduct, we expect and encourage you to report it. Ideally, you should bring any concerns forward as stated in the Code of Business Conduct. 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 to allow you to speak-up anonymously, if you prefer to do so.

Why should I report what I know?

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 any laws, rules or regulations are breached.

What happens after I file a report?

When you file a report online or by phone, you will receive a unique report key and are asked to choose a password. Safeguarding those is important, as the password cannot be provided to you if lost. If you lose your password, you will need to file a new report and reference your previous filed report. Please note that the report key and password will allow you to access your report at a later time to add more detail or answer questions from the Legal Compliance Office. We encourage you to follow-up your report regularly and check for feedback thereto.

Where do these reports go? Who can access them?

Reports are entered directly on the service provider's secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to the members of the Legal Compliance Office who are charged with evaluating the report, and based on the type of violation and location of the incident also to other selected persons. Each of these report recipients has had training in keeping these reports in the utmost confidence. Please note that the EthicsPoint system is designed so that implicated parties are not notified or granted access to reports in which they have been named.

Will I be protected from retaliation if I file a report?

Retaliation against anyone who reports a concern or participates in an investigation in good faith, even if the allegation ultimately is not substantiated, is prohibited. You are encouraged to seek advice or report concerns without fear of retaliation.

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment. EthicsPoint is contractually committed not to pursue a reporter's identity.