

EthicsPoint

FAQ

ABOUT ETHICSPPOINT

What is EthicsPoint?

EthicsPoint 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.

Why does SNC-Lavalin need a system like EthicsPoint?

- SNC-Lavalin has informed us that they believe that their employees are their most important asset. By creating open channels of communication, SNC-Lavalin wishes to promote a positive work environment and maximize productivity.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- An effective reporting system will augment SNC-Lavalin's other efforts to foster a culture of integrity and ethical decision-making.

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 telephone or internet.

What type of situation should I report?

The EthicsPoint system is designated for the reporting of any violation of the SNC-Lavalin Code of Ethics & Business Conduct, or any other issues or concerns stemming from this Code and its underlying policies.

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

If you have observed behavior that you believe violates SNC-Lavalin's Code of Ethics & Business Conduct, you are required to report it. Ideally, you should bring any concerns forward to your direct manager, or any other member of the management team. As well, you may also report the matter to the Vice-President of Human Resources of your business or functional unit, as well as any of the corporate contacts listed in the Code of

Ethics & Business Conduct. However, SNC-Lavalin recognizes that there may be circumstances where you may not be comfortable reporting the issue in this manner. It is for such circumstances that SNC-Lavalin has partnered with EthicsPoint to enable you to report anonymously, rather than keeping the information to yourself.

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

We all have the right to work in a positive environment: with that right comes the responsibility of acting in an ethical manner and letting the appropriate people in your organization know if someone is not acting appropriately. By working together with your employer, you can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

Does SNC-Lavalin management really want me to report?

SNC-Lavalin certainly does and needs you to report. You know what is going on in the 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 its people. Also, offering positive input may 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. Each of these reports recipients has had training in keeping these reports in the utmost confidence.

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

The EthicsPoint system concentrates on being a positive aspect of SNC-Lavalin's overall philosophy, and allows SNC-Lavalin to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate any issues or concerns. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

REPORTING SECURITY & CONFIDENTIALITY

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. In fact, EthicsPoint 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 the work environment of SNC-Lavalin (such as one located at an internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports generated during business hours.

Can 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. An internet portal never identifies a visitor by screen name and EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed no to pursue a reporter's identity.

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 designated 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 response into the EthicsPoint website. 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 AND BEST PRACTICES

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

SNC-Lavalin chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts a company and all employees, including you. Under SNC-Lavalin's Code of Ethics & Business Conduct, employees have the responsibility to report any violation of its Code. It is for this reason that SNC-Lavalin has retained the services of EthicsPoint to enable employees and third parties to report violations or address any issues or complaints relating to its Code of Ethics and Business Conduct.

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?

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. SNC-Lavalin has advised us that it would rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

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 designated 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 at the EthicsPoint website or through the EthicsPoint Call Center, you receive a unique username 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 or answer questions posed by a representative from SNC-Lavalin 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 questions. You and SNC-Lavalin 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 report as secure as the first one?

All EthicsPoint correspondence are held in the same strict confidence as the initial report, continuing under umbrella of anonymity.

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. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access or are uncomfortable using a computer, you can call the EthicsPoint too-free hotline 855-420-8647 which is available 24 hours a day, 365 days a year.