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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 and maintaining the integrity of Global Fashion Group.

Why do we need a system like EthicsPoint?

- Global Fashion Group attaches great importance to compliance with applicable laws and ethical standards. To prevent violations and to react to them in an adequate manner, we offer different channels for both employees and external parties to report any concerns.
- We believe that our people are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximise productivity.
- Global Fashion Group's reputation for doing business with integrity and respect for others is of the utmost importance. To maintain our reputation requires the highest standards of behaviour. An effective reporting system will augment our efforts to foster a culture of integrity and ethical practices and decision-making.

Reporting – General

How do I file a report?

With EthicsPoint, you can file a confidential report via either the telephone or the Internet.

What type of situations should I report?

The EthicsPoint system is designed to report any violation of our stated group policies including, but not limited to, our Business Conduct and Ethics Policy or other concern you may have.

If I see a violation, shouldn't I just report it to my manager or the People & Culture team and let them deal with it?

When you observe some behaviour that you believe violates our policies, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our Senior Leadership Team. We recognise, 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. We would rather you report anonymously than keep 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 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.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. Corporate misconduct can threaten the livelihood of an entire company. 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 minimise 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.

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 report recipients has had training in keeping these reports in the utmost confidence, in line with our policies and procedures.

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

Absolutely not. The EthicsPoint 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 EthicsPoint 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

It is my understanding that any report I send from a company computer generates a server log that shows every website 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 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 EthicsPoint secure website.

Can I file a report from home and 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 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.

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, 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 Joan Johnson..." or "In my 10 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 responses 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.

What if my line manager is involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system is designed so that implicated parties are not notified or granted access to reports in which they have been named.

Following Up After a Report

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 Centre, 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 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.

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

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

Tips & Best Practices

Should I use EthicsPoint to report an imminent and/or potentially dangerous situation?

EthicsPoint is not 999 or an emergency service. Please 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 emergency services without delay.

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

Global Fashion Group chooses to promote ethical behaviour. All unethical conduct, at any level, ultimately hurts our 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.

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. We'd rather you report a situation that turns out to be harmless than let possible unethical behaviour go unchecked because you weren't sure.

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 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.