

[About EthicsPoint](#)

[Reporting – General](#)

[Reporting Security & Confidentiality](#)

[Tips & Best Practices](#)

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool which assists Saxo in addressing fraud, abuse, breach of legislation and other misconduct.

Reporting – General

How do I report a whistleblower case?

With EthicsPoint, you have the ability to file a confidential, possibly anonymous report via the Internet.

What type of situations should I report?

The EthicsPoint system is designed for reporting of violation of applicable laws, guidelines, Saxo's own policies or other concerns you may have.

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 the Whistleblowing Committee with Saxo who will evaluate the report and decide which action is needed. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Reporting Security & Confidentiality

It is my understanding that any report I send from a 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 own PC, you have the option of using another PC, such as one located at an Internet café, at a friend's house, etc.

Can I file a report from my PC and still remain anonymous?

A report from your home PC, a neighbour's PC, 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 fully 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.

What if I want to be identified with my report?

There is a section in the report for identifying yourself.

Tips & Best Practices

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

Saxo promotes ethical behaviour. All unethical conduct, at any level, ultimately affects the company and its employees. Hence, if you know of any incidents of misconduct or ethical violations, consider it your duty 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. The EthicsPoint system can help you prepare and file your report so it can be properly understood. We would rather you report a situation that turns out to be harmless than let possible unethical behaviour go unchecked because you were not 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 ensure 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 Web, 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 details 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 Saxo now have entered into an "anonymous dialogue", where situations are not only identified, but may also be resolved.

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.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.