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## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is an independent company that provides secure, confidential telephone and web-based systems for use by those who wish to report a concern they may have with regard to compliance with Linxens Corporate Social Responsibility Code of Conduct or its related policies, or the laws and regulations applicable to Linxens in connection with its business.

### Why do we need a system like EthicsPoint?

- Linxens conducts its operations in a fair, transparent and responsible manner, in compliance with the laws and regulations applicable to its operations, with the highest standards of professionalism, honesty, integrity and ethics.
- In this regard, Linxens is committed to developing a culture of openness and honesty where a person who is aware of a potential malpractice or misconduct is encouraged to report such matters in good faith and without fear of retaliation.

## Common questions about reporting a concern

### 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 country specific hotline numbers (the “**Ethics Line**”) or the Linxens EthicsPoint website (the “**Web Intake Site**”). Please refer to the Whistleblowing Policy for guidance on these matters.

### What type of situations should I report?

The EthicsPoint system is designed for employees, suppliers, customers and other stakeholders (the “**Reporters**”) to report any concerns with regard to compliance with the Linxens Corporate Social Responsibility Code of Conduct or its related policies, or the laws and regulations applicable to Linxens in connection with its business.

Regardless of their form or medium, facts, information or documents that are military secrets or are subject to medical confidentiality rules or the attorney-client privilege cannot be collected through the EthicsPoint system.

Concerns about an immediate threat of physical harm or damage to property should not be reported to EthicsPoint. If you require emergency assistance, please contact your local emergency services.

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

When you observe some behavior that you believe violates the Linxens Corporate Social Responsibility Code of Conduct and/or its related policies and any applicable regulations, we expect you to report it. Ideally, you should bring any concerns forward to your local management or a representative of the Human Resources and/or to the Linxens Chief Compliance Officer. 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. 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. 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.

**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. The setting up and control of the EthicsPoint system shall be assigned to the Linxens Chief Compliance Officer and a dedicated team (together, the **"Authorized Personnel"**). EthicsPoint notifies the Authorized Personnel when a concern is received. The Authorized Personnel then commences an appropriate investigation, using internal and external resources with expertise in conducting investigations. Each of these report recipients has had training in keeping these reports in the utmost confidence.

# Reporting Security & Confidentiality

## How does EthicsPoint maintain confidentiality?

EthicsPoint does not trace phone calls or use caller identification. EthicsPoint does not generate or maintain any internal connection logs containing Internet Protocol (IP) addresses, so no information linking your computer to EthicsPoint would be available. Reports from your computer would come through a secure Internet portal which does not trace or show user screen names. Finally, EthicsPoint removes Internet addresses to ensure that anonymity in the EthicsPoint system is maintained. EthicsPoint will not use information reported to it for any purpose other than passing along the information to Linxens for appropriate handling.

In fact, EthicsPoint is contractually committed not to pursue a Reporter's identity.

If you feel uncomfortable making a report on your work computer, you have the option of using a computer outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through this website. 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...". By using the Ethics Line, 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 Web Intake Site. These reports have the same security and confidentiality measures applied to them during delivery.

## Tips & Best Practices

**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 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 designed 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 Web Intake Site or through the Ethics Line, you receive a unique user name 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 Web Intake 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.

**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 Ethics Line, which is available 24 hours a day, 365 days a year.