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About the Ethics Line

What is the Ethics Line?

The Ethics Line is a comprehensive and confidential reporting tool, run by an independent third party, NAVEX Global. It is an important tool enabling all NSK Europe employees to report ethical concerns such as fraud, corruption, harassment, and any other improper practices, confidentially or anonymously (*if your local law permits) if you wish.

Why do we need a system like the Ethics Line?

We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment. In addition, an effective reporting system will enhance our efforts to foster a culture of integrity and ethical decision-making, encouraging a speak up culture.

Reporting – General

Can I report using either the Internet or the telephone?

Yes. With the Ethics Line, you have the ability to file a confidential or anonymous (*if your local law permits) report via either the telephone or the Internet.

What type of situations should I report?

The Ethics Line system is designed for all employees of NSK Europe to report any form of unethical behaviour, violations of our Code of Ethics, or any other appropriate concerns.

If I see any type of unethical behaviour or violation, shouldn't I just report it to my manager, Human Resources, or the Legal, Risk & Compliance Department and let them deal with it?

If you observe behaviour that you believe violates our Code of Ethics, we encourage you to report it. In the first instance, you should consider raising a concern internally; with your line manager, or another member of your management team, through HR or to the Legal, Risk & Compliance Department. However, we recognise that there may be circumstances when you are not comfortable reporting an issue in this manner. In these circumstances, you can report a concern using the independent confidential hotline, the Ethics Line.

*Netherlands are exempt from reporting anonymously

Why should I report what I know?

Speaking up is the responsibility of all of us. It protects you, your colleagues and the wider business. 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 help maintain a healthy and productive environment.

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 give cause for concern. By reporting a concern, you can help 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 to Navex Global's secure server to prevent any possible breach in security. Navex Global makes these reports available only to specific individuals within NSK Europe who are responsible for evaluating and investigating the report depending on the type of concern and location of the incident. Each of these report recipients follows strict protocols in keeping these reports in the utmost confidence.

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

The Ethics Line is 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 this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to provide a positive reporting environment whilst meeting our compliance obligations.

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?

Navex Global do not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to Ethics Line is available. In fact, Navex Global 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 Smartphone or a computer outside our work environment (such as one at an Internet café, at a friend's house, etc.)

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through the Ethics Line secure website. Many people choose this option, as Navex Global's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbour's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and Navex Global's system strips away Internet addresses so that anonymity is totally maintained. Plus, Navex Global is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide Ethics Line will ultimately reveal my identity. How can you assure me that will not happen?

Navex Global's system is designed to protect your identity. However, if you wish to remain anonymous (*and your local law permits), you - as a reporting party - need to ensure that the body of your report does not reveal your identity by accident.

Is the telephone freephone hotline 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 Ethics Line Web site. These reports have the same security and confidentiality measures applied to them during delivery.

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What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

Tips & Best Practices

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

We are all responsible for speaking up if believe something is not right. Speaking up is important as it protects you, your colleagues and the business. There can be no excuse for ignoring an issue or saying, "That's not my problem". Unethical conduct, at any level, can damage a company and affect 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. Therefore, we encourage you to raise concerns or ask questions through the channels available to you.

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I am not sure if what I have observed or heard is a violation of our Code of Ethics, or involves unethical conduct, but it just does not look right to me. What should I do?

In the first instance, we encourage you to ask a question or raise a concern with your line manager or another manager. You can also call or email the Legal, Risk & Compliance team for their advice.

If you do not feel able to use the existing internal channels available to you, or you wish to remain anonymous, you can report a concern on the Ethics Line.

We'd rather you report a situation that turns out to be harmless than let possible unethical behaviour go unchecked because it went unreported through doubt.

What if my manager or other managers are involved in a violation? Won't they get the report and start a cover-up?

Navex Global's system and report distribution is designed so that implicated parties are not notified or granted access to reports in which they have been named. When following up on reports, the Legal, Risk & Compliance team would not send a report to an implicated manager but instead find another "independent" person in the business to support their investigation.

What if I remember something important about the incident after I file the report? Or what if NSK Europe has further questions for me concerning my report?

When you file a report on the Ethics Line, either through the web site or by telephone, you will receive a unique username and are asked to choose a password. This enables you to return to the Ethics Line system later, either by Internet or telephone, and access the original report to add more detail or answer any questions posed by NSK Europe 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 NSK Europe will have an "anonymous dialogue", where situations can be investigated and followed up to resolution.

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

All Ethics Line correspondence is 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 Ethics Line report from any computer that can access the Internet. You can file from home and many public locations, such as public libraries, an Internet café, or a friend's house, etc. If you don't have access to or are uncomfortable using a computer, you can call the Ethics Line free phone hotline, which is available 24 hours a day, 365 days a year.

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