



FREQUENTLY ASKED QUESTIONS & ANSWERS

ABOUT SPEAK UP LINE

How does the SPEAK UP line work?

The SPEAK UP line is operated by NAVEX, an independent compliance & ethics service provider, who utilizes a comprehensive and confidential reporting tool to assist CFAO management, employees and associated third parties to work together to address concerns of fraud, corruption, abuses, and other misconducts in violation of the Global Code of Conduct & Ethics "COCE" and Anticorruption Code, aiming to create a positive work environment for all.

Reports can be made anonymously, although CFAO encourages you to identify yourself in order to work hand in hand with you to investigate your report. CFAO guarantees strict confidentiality in the handling of information that you provide and assures your protection from victimization or retaliation as a whistleblower.

Why is the SPEAK UP line important to CFAO?

We believe that employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.

An effective reporting system will support our other efforts to foster a culture of integrity and ethical decision-making.

REPORTING – GENERAL

May I report using either the Internet website or the telephone?

Yes. Through the SPEAK UP line you have the ability to make a report either via web or telephone.

What type of situations should I report?

The SPEAK UP line is provided for employees and associated third parties to report in good faith any concern about a violation of the COCE or the CFAO Anticorruption Code. You should not make a false report, or one with malicious or vexatious purpose. The abuse of SPEAK UP can expose its author to disciplinary sanctions as well as to legal proceedings.

Are there other channels to report any concern about a violation of the COCE or Anticorruption Code?

Yes, ideally, you should report a concern about any violation of the COCE or Anticorruption Code to your line manager(s). We recognize however, that there may be circumstances when you are not comfortable reporting your concern in this manner. It is for these circumstances that we have provided this SPEAK UP line for you to make a report.

Why should I report what I know?

By working together to reduce illegal or unethical misconduct in the workplace, we can maintain a healthy and productive work environment that we can all be proud of. Any violation of the COCE or Anticorruption Code can threaten the livelihood of our company and could expose us to irrecoverable reputational damages or penalties & fines.

Does CFAO really want me to make a report?

Yes. As employees, you have business intelligence and are aware of what is going on in our Group - both good and bad. You may have initial knowledge of an activity that may be a cause for concern. Your report can minimize the potential negative impact on us and all of our valued stakeholders.

Where do these reports go? Who can access them?

Reports are sent directly to a secure server operated by NAVEX to prevent any possible breach in security. These reports are then managed in accordance with CFAO's Alert Procedure.



REPORTING SECURITY & CONFIDENTIALITY

Won't this website trace my PC when I make a report?

The SPEAK UP line operated by NAVEX, does not generate or maintain any internal connection logs with IP addresses; no information linking your PC to NAVEX is available. In fact, NAVEX is contractually bound to not investigate or pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you also have the option of using a PC outside the work environment (such as one located at an Internet café, the library, at a friend's house, etc.) through the NAVEX secure website.

Can I make a report from outside the workplace?

Yes. Any report made via the web will remain secure. An Internet portal never identifies a visitor by screen name and the NAVEX system removes any identifying information, such as an IP address, so your identity is protected. CFAO does encourage you to identify yourself when making a report. It is important to note that anonymous reports might not be investigated unless they are accompanied by sufficient information and evidence, for example, documents, supporting data etc. to validate the seriousness of the facts to be established.

I am concerned that the information I provide to SPEAK UP line will ultimately reveal my identity. How can you assure me that will not happen?

NAVEX who operates the SPEAK UP line is contractually bound to not investigate or pursue a reporter's identity. You decide how much information you wish to share in your report – of course the more information that you share, the better the report can be investigated. CFAO assures that your identity will be protected and that your information shared will be handled with strict confidence.

Is the telephone line confidential?

Yes. You will be asked to provide the same information you would provide in the report by web. The interviewer will type your responses directly into NAVEX's secure system and the same security and confidentiality is applied, as is applied to reports made by web. The report that is then generated for dispatch will be handled by CFAO in strict confidence.

What if I want to be identified when making my report?

CFAO absolutely encourages you to identify yourself in the report in order to facilitate the investigation and to provide you feedback on the outcome. There is a section in the report where you can identify yourself. Your identity and the information that you share will be held in strict confidence.

TIPS & BEST PRACTICES

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

The NAVEX system and the way reports are captured, processed and dispatched, ensures that persons named and implicated in a report, are never notified about the report.

What if I remember something important about the incident after I make a report?

When you make a report, either by web or by telephone, you will receive a unique report key and be asked to select a password. With the report key and your password, you can return to the NAVEX system again, either by web or by telephone, and access the original report. At that point, you can add more details if you would like to.



What if you have questions for me concerning my report?

The investigator of the report made to the SPEAK UP line may pose some questions to you in order to facilitate and investigate your alert. This is why identifying yourself is so important. In the exceptional case where you still choose to remain anonymous, you are required to follow up on your report to check for questions by contacting Navex again using your report key and password.

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

All correspondences and follow ups are treated the same - CFAO assures you that your identity and information provided will be held in strict confidence and that you will be protected as a whistleblower.

Can I still make a report if I don't have my own access to the Internet?

Yes. You can make a report from any computer that can access the Internet (Home, public locations, libraries, cafés etc.) If you don't have web access or are uncomfortable using a computer, you can also call the NAVEX toll-free telephone line which is available 24 hours a day, 365 days a year.

What should I do if the telephone number is not working?

If the telephone number listed above is not functioning, firstly check to see that you used the correct number, and if still not working, then please make your report by web. Please indicate in the web report that the telephone number did not work so we can try to resolve the problem.

What should I do if the country I am in is not listed above?

If there is no telephone service for your location, please make your report by web. Please indicate in the web report that the telephone services for your country are not available.

What should I do if I lose my report key or forget the password I created?

Because of the high level of security that is maintained for these reports, 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 you previously submitted.