

Whistleblower Q+As

About EthicsPoint

Q: What is the Whistleblowers' hotline EthicsPoint?

A: EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX to assist management, employees, business partners and other interested parties (whistleblowers) work together in addressing fraud, abuse, and other misconduct in the workplace.

Q: Why do we have a system like this one?

A: We believe that having more channels of communication can promote a more positive work environment and business relationship. We recognise that in certain circumstances reporting a wrongdoing may prove challenging, and this tool can provide a way to report violations safely and anonymously.

Reporting

Q: May I report using either the Internet or the telephone?

A: Yes. With EthicsPoint you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

Q: What type of situations should I report?

A: The EthicsPoint system is designed for whistleblowers to report any violation of our stated Code of Conduct, or other concern you may have.

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

A: When you observe some behaviour that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, a member of the HR Team or if you are a business partner, your Greenenergy contact. 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.

Q: Why should I report?

A: 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.

Q: Where do these reports go? Who can access them?

A: Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to two designated senior members of the Group HR Team and a senior member of the Corporate Compliance Team who are charged with evaluating the report, based on the type of violation and location of the incident.

Once the first assessment is completed, the report may be reviewed by Greenenergy's CEO and the Group Head of Risk and Compliance. Any other dissemination will be on an anonymised basis. All report recipients have had training in keeping these reports in the utmost confidence. The report may be investigated by designated local or Group resource, depending on the nature of the report itself. Whistleblowers can also make a report to their local Legal or Compliance contact or make a report through EthicsPoint. All individuals involved in investigations will be aware of their confidentiality obligations.

Security and confidentiality

Q: 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?

A: 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 whistleblower'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.) or another device, through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

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

A: All reports are secure and anonymous, irrespective of what device is used to register the report. 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 whistleblower's identity.

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

A: 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 desk next to Jan Smith...' or 'In my 33 years...'

Q: Is the telephone hotline confidential and anonymous too?

A: 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.

Q: What if I want to be identified with my report?

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

Tips and best practices

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

A: One of Greenenergy's core values is integrity – doing the right thing is part of our identity. All unethical conduct, at any level, ultimately hurts the company, our business partners and all employees.

Any lapse in ethics can have a significant impact on our business and reputation. If you know of any incidents of misconduct or ethical violations, it is your duty to yourself and your coworkers to report it.

Q: 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?

A: If in doubt, 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.

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

A: 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.

Q: 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?

A: When you file a report at the EthicsPoint website or through the EthicsPoint Call Centre, 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 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.

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

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

Q: Can I still file a report if I don't have access to the Internet?

A: You can file an EthicsPoint report from any device that can access the Internet. If you don't have access to or are uncomfortable using filing a report from a device, you can call the EthicsPoint hotline, which is available 24 hours a day, 365 days a year.