

About EthicsPoint

About This Reporting System

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What is EthicsPoint?

EthicsPoint is a comprehensive, confidential reporting system provided by NAVEX. It enables SB Foods Group employees, suppliers, business partners, and others to help us achieve business activities that respect human rights and sustainable procurement throughout our supply chain.

Why is a system like EthicsPoint necessary?

Having an effective reporting system reinforces our efforts to foster a culture of honest and ethical decision-making.

About This Reporting System

Can I report via the internet or phone?

Yes. EthicsPoint allows confidential, anonymous reporting via phone or the internet.

Who can use this reporting system? Who can use it?

This system is a web portal provided by the S&B Foods Group, intended for use by S&B Foods, its subsidiaries, suppliers, business partners, and other stakeholders.

What situations should be reported?

This EthicsPoint system allows reporting of violations or suspected violations of the S&B Foods Group's Human Rights Policy and Sustainable Procurement Policy.

Please note that EthicsPoint is not an emergency phone number or emergency service. Do not use this system to report situations involving imminent threats to life or property.

Shouldn't I report violations to my supervisor, security department, or HR within my company and leave the response to them?

If you believe an action by the S&B Foods Group violates the “S&B Foods Group Human Rights Policy” or the “Sustainable Procurement Policy,” we encourage you to report it through this system. Ideally, you should report such concerns to your direct supervisor or team members. However, there may be situations where you feel reluctant to report in this manner. To address such situations, S&B Foods Group utilizes NAVEX. We encourage you to report concerns, even anonymously, rather than keeping the information to yourself.

Why must I report what I know? What does this have to do with me?

We all have the right to work in a positive environment. That right comes with the responsibility to act ethically and to report inappropriate behavior to the appropriate person when it occurs. By working together, we can maintain a healthy and productive workplace. Corporate misconduct can threaten the very existence of a company.

Where does the reported information go? Who has access to it?

The reported information is sent directly to EthicsPoint's secure server. At NAVEX, only specific personnel appointed based on the type of violation and the location where the incident occurred can access the reported information. Each personnel member who receives a report is trained to ensure the utmost confidentiality of the content. Information submitted, including personal information, may be accessed, processed, and used by S&B Foods Group and its affiliates' personnel, external advisors (such as legal counsel), or, in limited circumstances, NAVEX technical personnel, for the purpose of responding to the report and investigating its contents, in accordance with local legal requirements.

Is someone monitoring me through this system?

No. EthicsPoint is an excellent tool for enhancing communication.

The S&B Foods Group carefully selected the best reporting tool to maintain an environment conducive to reporting while fulfilling compliance obligations.

Report Safety and Confidentiality

I understand that using a company computer to report generates server logs, recording all websites accessed by that computer. Could these logs identify me as the reporter?

NAVEX does not generate or maintain internal connection logs, including IP addresses. Therefore, there is no information linking your computer to EthicsPoint.

If you feel uneasy reporting from a workplace computer, you can access the secure EthicsPoint website from a computer outside your workplace environment (e.g., internet café, friend's home). According to NAVEX data, less than 12% of reports are made during work hours, with many people reporting from outside the workplace.

Is my anonymity protected if I report from home?

Reports submitted from home, a neighbor's computer, or an internet portal are also processed securely and anonymously. The internet portal cannot identify visitors based on screen names. Furthermore, the EthicsPoint system removes internet addresses, ensuring complete anonymity.

I'm concerned that the information I provide to EthicsPoint could lead to my identification. How can you guarantee I won't be identified?

The EthicsPoint system protects your anonymity. However, to ensure your anonymity as a reporter, you must take care that your identity cannot be identified from the content of your report. For example, you should not write things like “From my desk next to Jean Smith's...” or “During my 33 years of service...”.

Is confidentiality and anonymity also maintained for reports made via the free telephone hotline?

Yes. The same information is requested as for reports made via the internet, and the representative will enter the response into the EthicsPoint website. These reports also undergo the same security measures and confidentiality safeguards upon submission.

What should I do if I wish to report while identifying myself?

If desired, there is a field to enter identifying information.

Tips and Best Practices

I am aware that someone associated with S&B Foods Group is involved in unethical behavior, but it doesn't affect me. Why should I bother reporting it?

S&B Foods Group promotes ethical conduct. Unethical behavior, regardless of its severity, impacts S&B Foods Group and other stakeholders, including you. Remember recent corporate scandals where seemingly minor ethical lapses led to disastrous outcomes for otherwise sound companies. If you notice misconduct or ethical violations by S&B Foods Group, consider reporting it your duty to yourself and your colleagues.

I'm not sure if what I saw or heard violates S&B Foods Group policy or is unethical. But it doesn't feel right. What should I do?

Report it. NAVEX supports reporting to ensure your concerns are properly understood. Please do not overlook potentially unethical behavior; report it. It's okay if it later turns out to be nothing.

What if my supervisor or other manager is involved in the violation? Won't they get the report and try to cover it up?

The EthicsPoint system and reporting process ensure that parties allegedly involved will not receive or view reports containing their names.

What if I remember something important after reporting? What if S&B Foods Group has further questions about my report?

When you submit a report via the EthicsPoint website, you will receive a randomly generated number called a “Report Key” and set a password. You can then access the EthicsPoint system again via the internet to add details to your report or respond to questions from an S&B Foods Group representative. We strongly recommend accessing the system within the specified timeframe to respond to questions from S&B Foods Group. This creates an “anonymous dialogue” between you and S&B Foods Group. This allows even complex issues to be identified and resolved.

Is follow-up communication after the initial report protected by the same security measures as the initial report?

All communications with EthicsPoint remain strictly confidential and anonymous, just as they were during the initial report.

What should I do if I lose my reporting key or forget my registered password?

To ensure the confidentiality of your report, if you lose your reporting key or password, you will need to submit a new report. When doing so, please clearly indicate that it relates to the content of a previous report or inquiry you submitted.

Can I submit a report if I don't have internet access?

EthicsPoint reports can be submitted from home using any computer with internet access. Internet access is available at many public facilities, such as public libraries. If you have difficulty using a computer or feel uncomfortable doing so, please call the 24-hour EthicsPoint toll-free hotline.