

# FAQs

## About the Ralph Lauren Hotline

### **What is the Ralph Lauren Hotline?**

The Ralph Lauren Hotline is a voluntary reporting tool operated on behalf of Ralph Lauren by NAVEX to assist Ralph Lauren management in addressing fraud, abuse, and other misconduct and illegal activities in the workplace, all while cultivating a positive work environment.

### **Why has Ralph Lauren contracted with NAVEX for reporting of concerns?**

NAVEX is an independent company selected by Ralph Lauren to provide secure, confidential telephone and web-based systems for use by Ralph Lauren's current and former employees, interns and trainees, vendors, contractors and subcontractors, job applicants, shareholders and other third parties having a work-related connection to Ralph Lauren, who wish to report a concern regarding business conduct or a suspected violation of company policy or local laws and regulations. In addition to providing service 24 hours a day, 7 days a week, NAVEX offers translation services that allow telephone and web reports to be made in many different languages. It is not NAVEX role to take action to address the concern, only to transmit the report to appropriate personnel at Ralph Lauren as required to investigate the report.

### **What Policies apply to the use of the Hotline and your personal information?**

Ralph Lauren is providing the Hotline through NAVEX EthicsPoint Incident Management solution. Your personal data will be collected and processed in accordance with the [Ralph Lauren Hotline Data Protection Notice](#). The NAVEX Privacy Statement is only applicable to the extent that NAVEX collects personal data through cookies and other similar technologies on its EthicsPoint Incident Management platform. In that case, NAVEX is solely responsible for such data collected on their website and for complying with applicable laws. More generally, the use of the Hotline is also subject to other Ralph Lauren policies which are available [here](#).

### **Why do we need a system like the Ralph Lauren Hotline?**

- We believe that our workforce is our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- In the United States, publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- In Europe, private sector companies with more than 50 employees are required to establish a whistleblower hotline or program that protects employees and other parties reporting misconduct in the workplace.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

## **Reporting – General**

### **May I report using either the Internet or the telephone?**

Yes. With the Ralph Lauren Hotline, you have the ability to file a report via either the telephone or the Internet.

### **What type of situations should I report?**

The Ralph Lauren Hotline is designed for current and past employees (including interns and trainees) and, to the extent permitted by applicable law, for vendors, contractors, job applicants, customers, subcontractors, shareholders and other third parties having a work-related connection to Ralph Lauren, to report concerns about violations of the law, the Ralph Lauren Code of Business Conduct and Ethics, the Ralph Lauren Fair Treatment Policy, or other instances of misconduct, subject to certain restrictions in some countries. Ralph Lauren guarantees that all reports will be taken seriously and handled confidentially to the extent practically possible and permitted by law. Ralph Lauren prohibits any form of retaliation or threat of retaliation. You will not suffer any adverse consequences for your reporting any concern in good faith.

### **What if this is an emergency?**

Please seek local authorities or emergency services.

### **If I see a violation, shouldn't I just report it to my manager, Global Security and Asset Protection, People & Development, Global People Practices, or Legal and let them deal with it?**

When you observe some behavior that you believe violates the law or Ralph Lauren's Code of Business Conduct and Ethics, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, Global Security and Asset Protection, People & Development, Global People Practices, Legal or other member of our management team. 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 NAVEX to offer the Ralph Lauren Hotline. Except where local laws prohibit it, 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.

### **Can I report anonymously?**

You can choose to make a report by identifying yourself or make a report anonymously where permitted by law. Details of local restrictions are provided in the country-specific dialing instructions or web intake form where they apply. When reports are made anonymously, the individual making the report will not be asked for his or her name or any other personally identifying information. We nevertheless encourage you to provide your name and contact information so that Ralph Lauren may contact you directly if further information is needed or to inform you of the outcome of the report.

### **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 organization — 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 company culture and performance.

### **Where do these reports go? Who can access them?**

Reports are entered directly on the NAVEX secure server hosting the Ralph Lauren Hotline to prevent any possible breach in security. The Ralph Lauren Hotline makes these reports available only to specific individuals within the Ralph Lauren organization who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

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

The Ralph Lauren Hotline concentrates on being 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 meet our compliance obligations while maintaining a positive reporting environment.

### **Are there other reporting considerations I should be aware of?**

Please note that the information you supply may result in decisions that affect other Ralph Lauren employees or third parties involved in the relevant incident. We, therefore, ask you to provide only information that, to the best of your knowledge, is accurate and relevant to the report. You will not be subject to retaliation from Ralph Lauren for any report of a suspected legal or company policy violation that is made in good faith, even if it later turns out to be incorrect. However, knowingly providing inaccurate or misleading information will not be tolerated and may result in disciplinary action or judicial proceedings.

## **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?**

The Ralph Lauren Hotline does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to the Ralph Lauren Hotline is available. In fact, NAVEX (which is the third-party service provider managing the Ralph Lauren Hotline) 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 PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.)

through the Ralph Lauren Hotline secure website. Many people choose this option, as NAVEX'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 neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the Ralph Lauren Hotline system strips away Internet addresses so that anonymity is totally maintained. Plus, NAVEX is contractually committed not to pursue a reporter's identity. However, some countries do not allow anonymous reporting and reports will be required to provide their names to submit a report. Details of local restrictions are provided in the country-specific dialing instructions or web intake form where they apply.

### **I am concerned that the information I provide the Ralph Lauren Hotline will ultimately reveal my identity. How can you assure me that will not happen?**

The Ralph Lauren Hotline system is designed to protect your privacy and confidentiality. However, if you wish to remain anonymous (where local laws allow), 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...". If you choose to identify yourself when you are reporting your concern, Ralph Lauren will make every reasonable effort to hold your name in confidence during the investigation. Many investigations can be more quickly and effectively completed when the individual is identified because it allows Ralph Lauren's investigator to follow up directly with the individual. Due to applicable laws, individuals you identify may be informed about the fact that a report has been made and have the right to respond to or correct information you report.

### **Is the telephone toll-free 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 Ralph Lauren Hotline Website. These reports have the same security and confidentiality measures applied to them during delivery.

### **What if I want to be identified with my report?**

There is a section in the report for identifying yourself.

## **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?**

Our organization chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the Ralph Lauren group in its entirety. 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. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

**I am not sure if what I have observed or heard is a violation of Ralph Lauren's policies, or involves unethical conduct, but it just does not look right to me. What should I do?**

File a report. Ralph Lauren Hotline 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 Ralph Lauren Hotline 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 Ralph Lauren Hotline Web site or through the Ralph Lauren Hotline Call Center, you receive a unique user name and are asked to choose a password. You can return to the Ralph Lauren Hotline system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a Ralph Lauren 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.

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

All Ralph Lauren Hotline correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity (where local laws allow).

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

You can file a Ralph Lauren Hotline 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 Ralph Lauren toll-free hotline, which is available 24 hours a day, 365 days a year.