



Q: What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool to assist management and employees to work together to address fraud, abuse, and misconduct in the workplace, all while cultivating a positive work environment.

Q. Why have we decided to deploy the EthicsPoint reporting system?

- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- We believe that our 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 can be our most useful tool in reducing losses due to fraud and abuse.

Q. Do we think our employees have knowledge of misconduct, and are not reporting it?

It is estimated that 75% of the employees in an organization like ours have some knowledge of misconduct and want to share this information with management. They just don't have a trusted communication channel.

The most common reason why an employee will not report is fear of retaliation or retribution from management and/or peers. Other reasons include a desire not to be identified, the fear that their supervisor might be involved, or they simply don't know where to report.

Q. How can the EthicsPoint reporting tool help in solving this problem?

EthicsPoint is designed to protect the anonymity and confidentiality of those who use the system. Knowing that the EthicsPoint reporting system supports reporter anonymity substantially increases the number of individuals who will share with us what they know.

Q. What can we tell our employees about this system that will increase their confidence in EthicsPoint and give them assurance regarding their anonymity and confidentiality?

EthicsPoint's system is designed to protect the anonymity of the reporter. The company is dedicated to this task, and we are contractually bound not to seek the identity of any reporter.

- Reports placed with EthicsPoint are protected by the latest encryption technology.
- EthicsPoint does not track or capture screen names or computer address (no cookies), to further protecting the reporter's identity.
- Report access requires that both reporters and report recipients enter unique login information.

Q. Do we really expect our people to report from their desks or workstations?

Yes, but since EthicsPoint provides Internet reporting capabilities, reporters can choose to communicate from their home, a neighbor's computer, or even the library. The possibility of reporting from the comfort of home, combined with the confidence that the system provides the highest level of anonymity and confidentiality, makes EthicsPoint truly unique.

Q. What kind of reports do we expect to receive?

While we believe we have no serious problems, it is not unrealistic to expect reports of ethical violations relating to accounting and finance and other incidents of misconduct such as theft, sexual harassment, discrimination, or collusion. We want to encourage reports on the violation categories we have defined, and we welcome feedback for enhancing these services moving forward.

Q. Doesn't this create an opportunity for our employees to file frivolous or unfounded reports?

Perhaps, but the EthicsPoint system has a direct follow-up feature that provides us the ability to qualify reports that may appear to be unfounded. As a general rule, less than 20% of all reports fall into this category and most are quickly identified as being unfounded.



Q: Won't our employees think that EthicsPoint is an example of someone watching over them?

Some may – however, the EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows our employees to partner with us to assure a safe, secure, and ethical workplace. If we promote the system properly, our employees will feel 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.

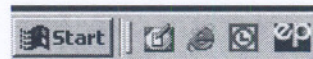
We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Q: What are some of the ways to promote EthicsPoint to our employees?

Acceptance of the program starts from the top down. Be positive about the system and reinforce the benefits and opportunities. Each employee will receive introductory materials explaining what the system is and how it works, and other promotional materials will be utilized.

Q: Will our employees have access to EthicsPoint from their desktop (optional)?

Yes. After EthicsPoint is installed, an icon is placed on each computer's desktop. Not only does this provide one-click access to the system, the icon also serves as a constant reminder that the system is there for users, further reinforcing <company>'s commitment to an ethical workplace.



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Q: What assistance does EthicsPoint provide for implementing the system?

EthicsPoint is very easy to install and implement and normally requires little assistance. We have been assigned a dedicated Client Services Representative that will work with us throughout the implementation and going forward. Please notify your designated Client Administrator should you have specific questions, concerns, or requests, and they will work with your EthicsPoint Client Services Representative to address the matter in a timely fashion.

Q. Can our vendors participate by reporting through EthicsPoint?

Yes. Vendors are often in a position to report questionable or unethical behavior or to offer suggestions for improvement. Therefore, EthicsPoint encourages our vendor partners to participate and share any information they feel may help the company.

Q: How can an employee, customer, or vendor report if they have no access to the internet?

Internet computers are available at many public locations - including most public libraries. For those uncomfortable with using a computer, EthicsPoint provides a toll-free hotline that is staffed with Intake Specialists 24-hours a day. Check with the Client Administrator for our applicable toll-free number assignment.

Q: Can a reporter choose to be identified, if so desired?

Yes. When filing a report, the system will ask if the reporter wishes to be identified for possible follow-up. The company distribution protocol will remain in effect to ensure that implicated parties are never made aware of the reporter's identity.