

ABOUT ETHICSPPOINT™

WHAT IS ETHICSPPOINT™?

EthicsPoint™ is a comprehensive and confidential reporting tool to assist managers, associates, business partners and vendors in working together to address fraud, abuse, and other misconduct in the workplace and in business relationships, all while cultivating positive interactions.

WHY DO WE NEED A SYSTEM LIKE ETHICSPPOINT™?

- We believe that our associates, business partners and vendors are important assets. By creating open channels of communication, we can promote a positive environment and maximize productivity.
- An effective reporting system will improve our 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 EthicsPoint™, you have the ability to file a confidential, anonymous report via the telephone or the Internet.

WHAT TYPE OF SITUATIONS SHOULD I REPORT?

EthicsPoint™ is designed for associates, business partners and vendors to report any violation of our stated Vendor Code of Conduct and Business Ethics Policy, Discrimination and Harassment Policy, as well as all other company policies or any other action that violates the ALDO Group's core values of love, respect and integrity.

IF I SEE A VIOLATION, SHOULDN'T I JUST REPORT IT TO MY MANAGER, SECURITY, OR HUMAN RESOURCES AND LET THEM DEAL WITH IT?

When you observe some behaviour that you believe violates our values and/or ethics, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, business contact or a member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue this way. We have partnered with EthicsPoint™ for these circumstances. 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 have positive business relationships. With this right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. Corporate misconduct can threaten the livelihood of an entire company. By working together, we can maintain a healthy and productive environment.

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 company – 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 not only the company, but also our associates, business partners and customers. In addition, offering positive input may help identify issues that can improve corporate culture and performance.

WHERE DO THESE REPORTS GO? WHO CAN ACCESS THEM?

Reports are entered directly on the EthicsPoint™ secure server to prevent any possible breach in security. EthicsPoint™ makes these reports available only to specific individuals within the company 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?

EthicsPoint™ concentrates on being a positive aspect of our overall philosophy, and allows us to ensure safe, secure and ethical work environments and relationships. 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 communication.

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

REPORTING SECURITY & CONFIDENTIALITY

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. WON'T THIS LOG IDENTIFY ME WITH THE REPORT?

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 reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside your work environment (such as one located at an Internet café, a friend's house, etc.) through the EthicsPoint™ secure website. Many people choose this option since EthicsPoint™'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 neighbour's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and EthicsPoint™ strips away Internet addresses so that anonymity is completely maintained. Plus, EthicsPoint™ is contractually committed not to pursue a reporter's identity.

I AM CONCERNED THAT THE INFORMATION I PROVIDE ETHICSPPOINT™ WILL ULTIMATELY REVEAL MY IDENTITY. HOW CAN YOU ASSURE ME THAT WILL NOT HAPPEN?

EthicsPoint™ is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that details in the body of the report do not accidentally reveal your identity. For example, "From my cubical next to Jan Smith..." or "In my 33 years...".

IS THE 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 EthicsPoint™ 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?

If you choose, there is a section in the report to identify 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 company promotes ethical behaviour. All unethical conduct, at any level, ultimately hurts the company, including every associate and business partner. You only have to consider a recent corporate scandal in the news 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 COMPANY POLICY, OR INVOLVES UNETHICAL CONDUCT, BUT IT JUST DOES NOT LOOK RIGHT TO ME. WHAT SHOULD I DO?

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.

WHAT IF MY BOSS OR OTHER MANAGERS ARE INVOLVED IN A VIOLATION? WON'T THEY GET THE REPORT AND COVER IT UP?

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.

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 EthicsPoint™ website or through the EthicsPoint™ hotline, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint™ system again by Internet or telephone and access the original report to add more details or answer questions posed by a representative. You may also add further information that will help resolve open issues. We strongly suggest that you return to the site in the specified time to answer company questions. You and the ALDO Group 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 EthicsPoint™ correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

CAN I STILL FILE A REPORT IF I DON'T HAVE ACCESS TO THE INTERNET?

You can file an EthicsPoint™ report from any computer that can access the Internet, including from home. Many public locations, including public libraries, have computers connected to the Internet. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint™ toll-free hotline, which is available 24 hours a day, 365 days a year.