

REDUCE RISK. CREATE TRUST.





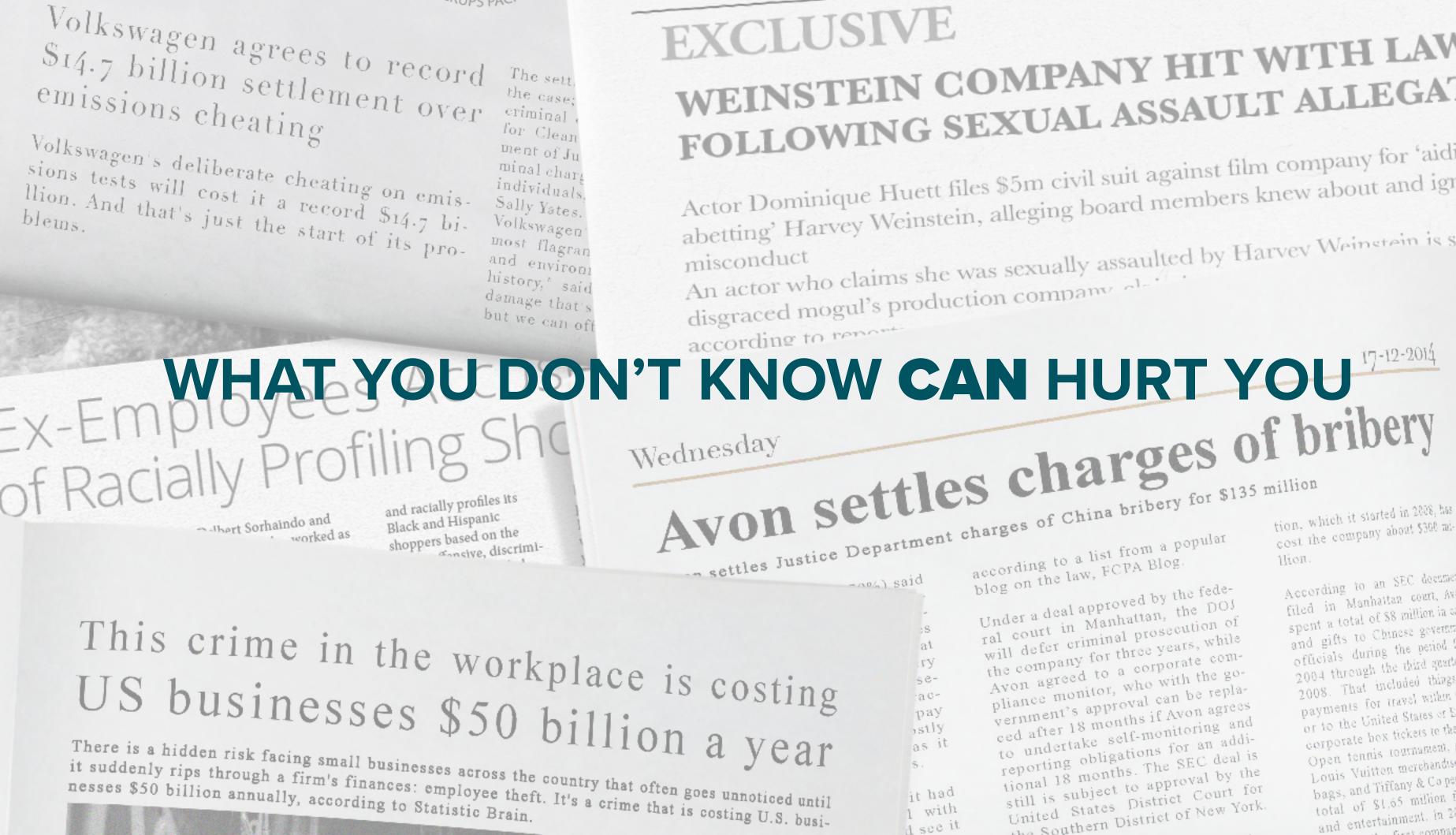


ETHICS HOTLINE & CASE MANAGEMENT PLATFORM

An online and mobile platform to provide employees, suppliers and customers a Confidential & Anonymous system to report incidents.

A Case Management portal to quickly and effectively investigate and resolve cases.





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WEINSTEIN COMPANY HIT WITH LAWSU FOLLOWING SEXUAL ASSAULT ALLEGATIO

Actor Dominique Huett files \$5m civil suit against film company for 'aiding an abetting' Harvey Weinstein, alleging board members knew about and ignored

An actor who claims she was sexually assaulted by Harvev Weinstein is suing t

blog on the law, FCPA Blog.

Under a deal approved by the federal court in Manhattan, the DOJ will defer criminal prosecution of the company for three years, while Avon agreed to a corporate compliance monitor, who with the government's approval can be replaced after 18 months if Avon agrees to undertake self-monitoring and reporting obligations for an additional 18 months. The SEC deal is still is subject to approval by the United States District Court for the Southern District of New York.

investigation

tion, which it started in 2008, has cost the company about \$300 mi-

According to an SEC document filed in Manhaitan court, Aven spent a total of \$8 million in cash and gifts to Chinese government officials during the period from 2004 through the third querter of 2008. That included things like payments for travel within China or to the United States or Europe, corporate box tickets to the China Open tennis tournament, mits of Louis Vuitten merchandise, Grass bags, and Tiffany & Copens, 2nda total of \$1.65 million for meaks and entertainment. in 2006, Aron became the first company to wina







EARLY WARNING

Help your organization address problems before they progress.

MEET STANDARDS

Enable an effective compliance program to meet regulatory standards set forth by USFSG, OECD and FCPA.

INCREASE TRUST

Increase employee trust in the entire process. Reduce fear of retaliation through prompt handling of allegations, keeping the reporter informed and always being transparent.

BENEFITS





MINIMIZE RISK

Reduce financial and reputational losses. Identify potential risk areas for your business via standard reporting and robust analytics.

PREVENT LAWSUITS

Help prevent legal action against your company for negligence. Provide an alternative to whistleblowing.



ONLINE & MOBILE REPORTING HOTLINE

- A platform to submit confidential or anonymous reports via web, tablet or mobile.
- An option to report in one of 11 different languages.
- Intuitive reporting interface that takes as little as 15 minutes to complete.

Eliminate the risk of employees complaining to the Department of Labor and customers venting on Yelp.

C EMPLOYEE CONTINUES

CASTARK/

General Information

Where are you reporting from

Select country

Defferent countries name reporting, Please select

Would you like to stan

No information about you is gathered, stored in O Anonymous

O Anonymous to Stark Industries No information about you is shared with Stark we store your name and e-mail address to sur-

 Contact info shared We share your name and e-mail addar

You are a (at



ONLINE & MOBILE REPORTING HOTLINE

Do you have any files you'd like to add to report?

SELECT FILES TO ATTACH

Supporting documents can be attached (e.g. videos, photos, screenshots, documents).

PRINT REPORT

Print and save a copy of the report.

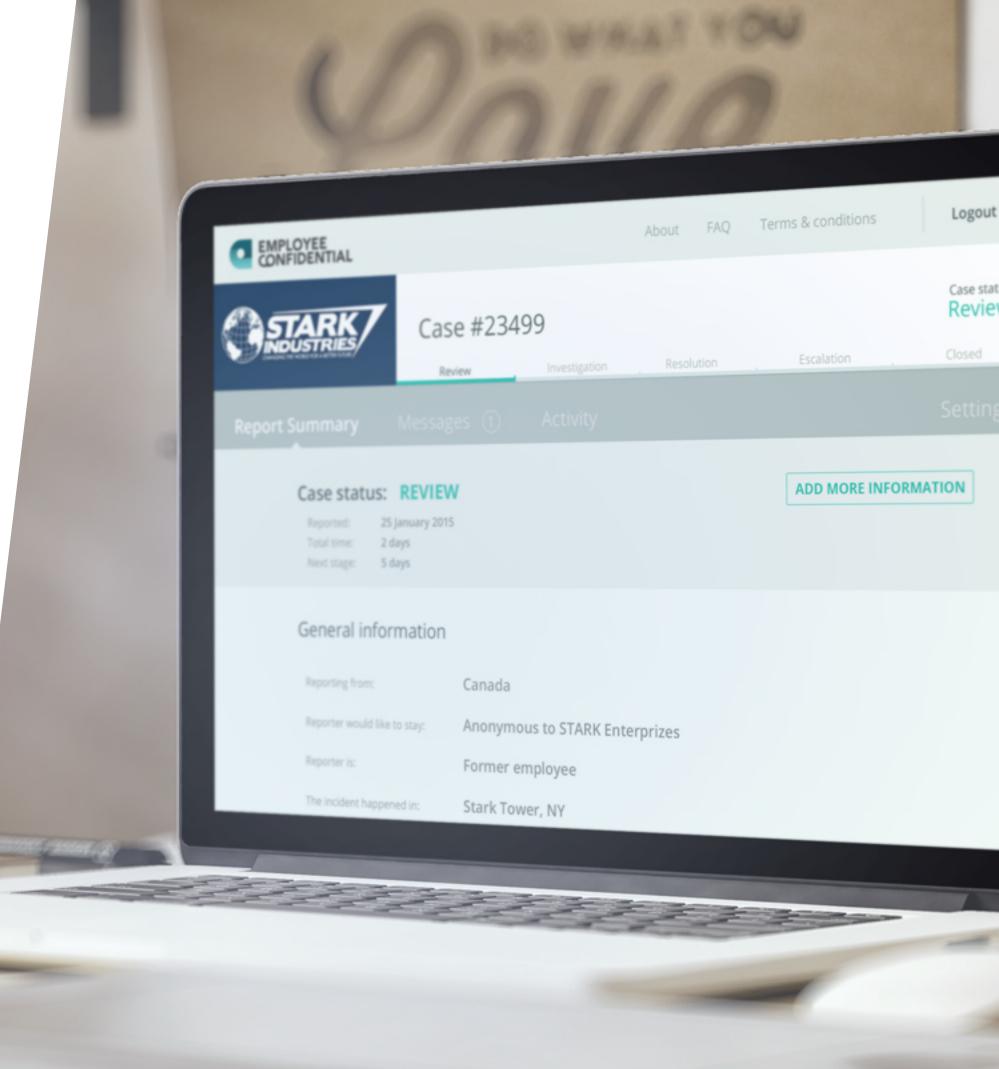


Reporters can monitor progress and answer messages from case administrators while keeping their anonymity.



REPORTER DASHBOARD

- Check case status.
- Correspond confidentially or anonymously with case officers.
- Add additional evidence and information.



PLOYEE IFIDENTIAL			About FAQ	Terms & conditions	Logout
	Case #23499				Case stat
Extensionary	Review		Resolution	Escalation	Closed
Summary					

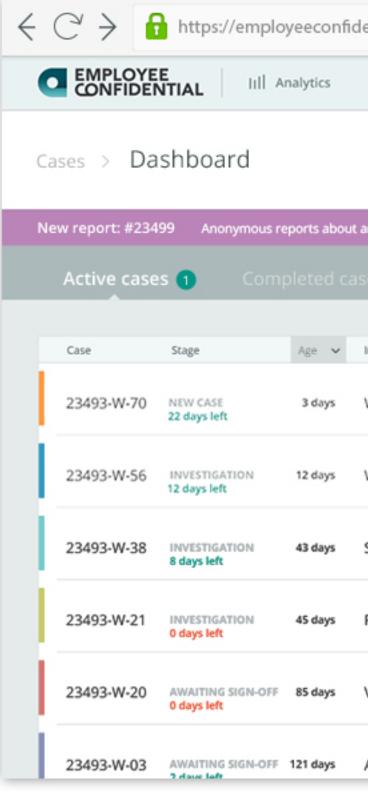
	Canada
	Anonymous to STARK Enterprizes
	Former employee
The incident happened in:	Stark Tower, NY



REVIEW CASE STATUS IN DASHBOARD

No more searching for emails and missing documentation or evidence.

All the case information is collected in a centralized case file.



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⊞ Tasks 🛛 🖓 Messages 🚱	🗐 Dashboard	Stark Logo

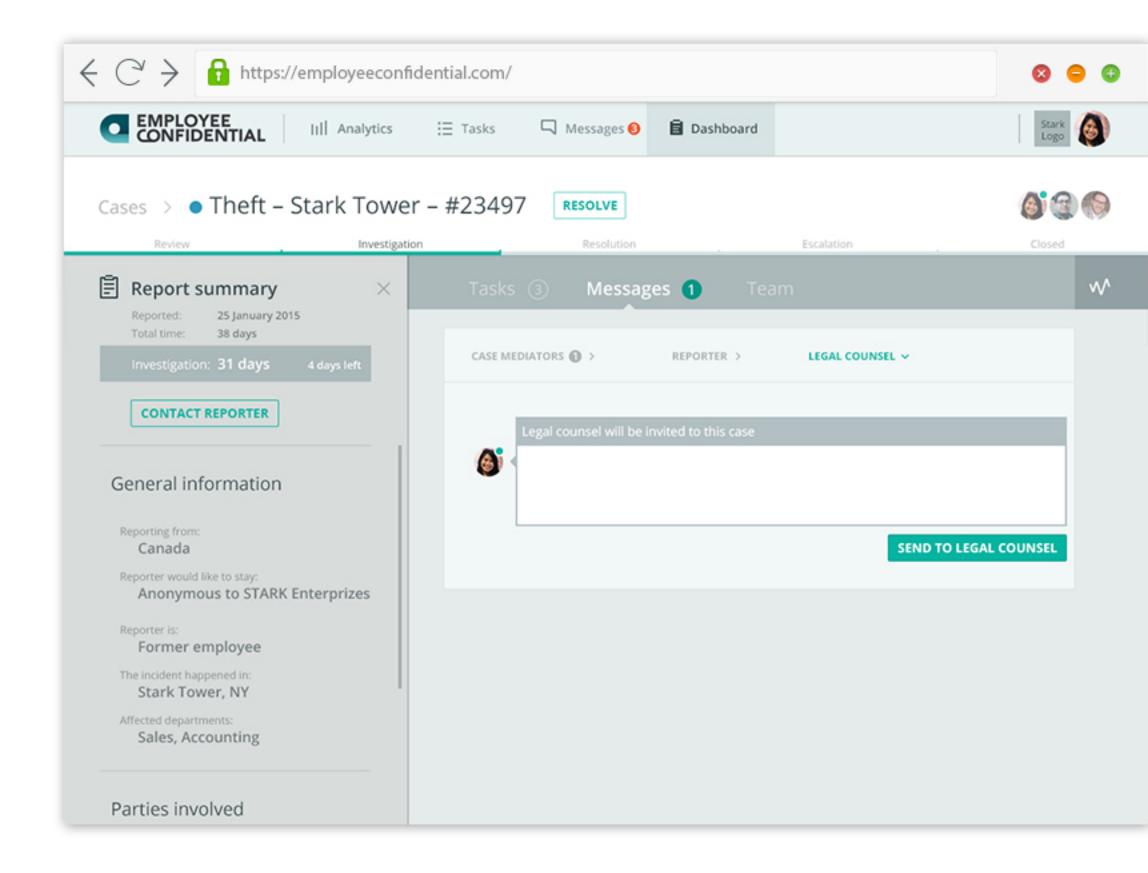
an assault in the Stern Building on April 22, 20	015 🔶					
				:	:	w
Incident Type	Location	Report date	Messages	Tasks	Team	
Workplace Health and Safety	San Francisco	May 13, 2017	3	1	4	
Waste, Abuse or Misue of Resources	New York	Jan 23, 2017	1	0	1	
Sofware Piracy/Intellectual Property	London	Aug, 10 2016	13	18	3	
Public Safety	Atlanta	Mar 08, 2016	2	1	2	
Violence/Threat	Austin	Mar 12, 2015	3	11	2	
Alcohol Abuse	Singapore	Feb 08, 2015	43	23	4	



MESSAGE WITH REPORTERS AND CASE ADMINISTRATORS

Discuss cases on a dedicated message boards.

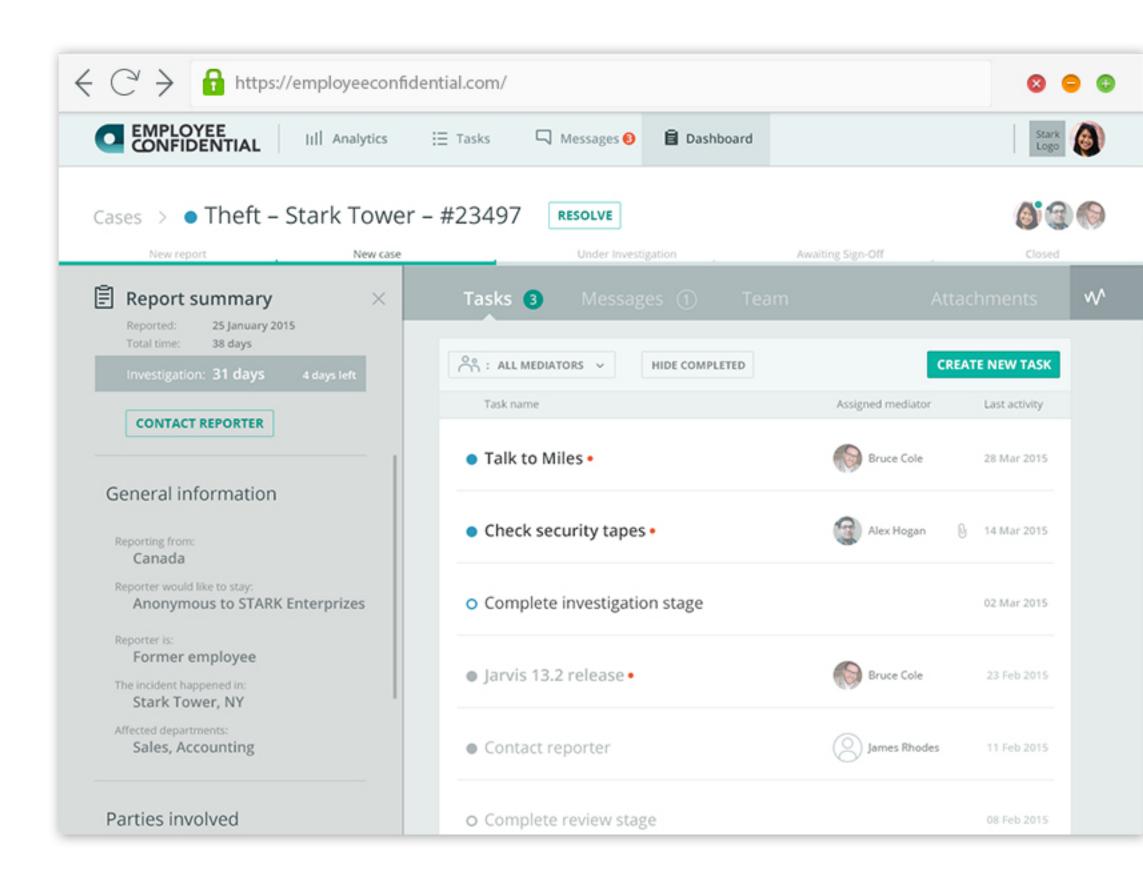
Messages are never deleted.





TRACK TASKS

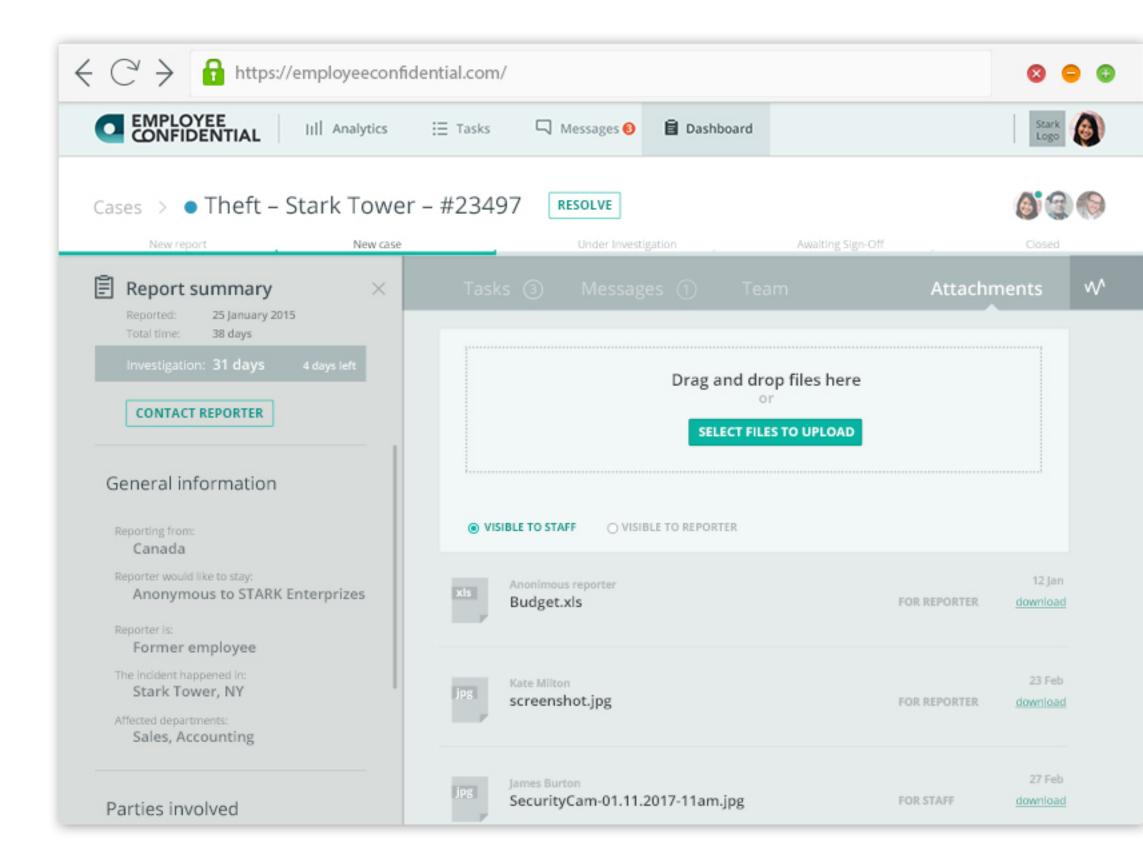
Task lists can be self-generated or assigned by case manager.





CASE MANAGEMENT ATTACH EVIDENCE

Keep auditable records of all supporting evidence with easy drag-and-drop uploads.

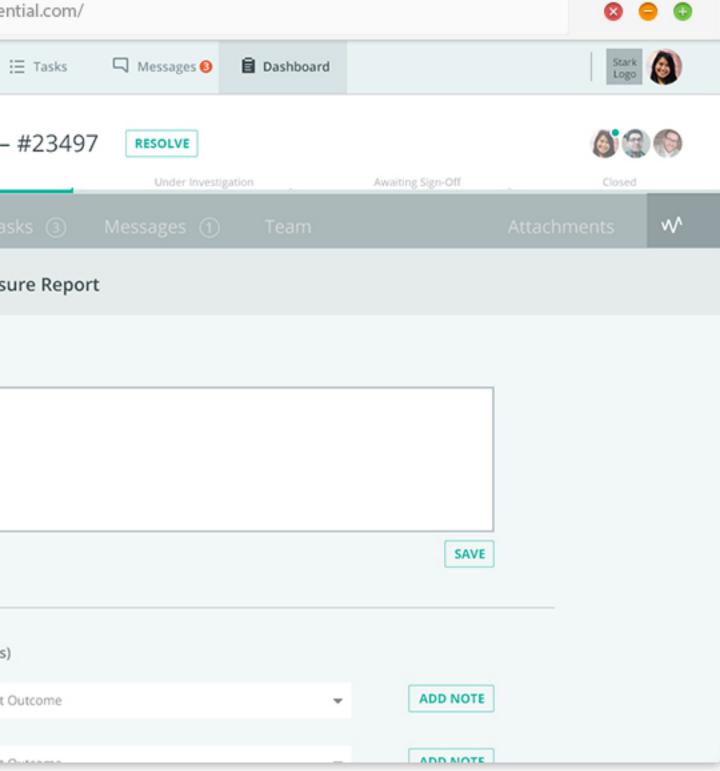




RECORD INVESTIGATION NOTES AND DOCUMENT ROUTE CAUSE OF INCIDENT AND SUBJECT

Track and report on the behaviors, organizational influences and environmental factors that drive misconduct.

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C EMPLOYEE III Analyt	ics
Cases > • Theft – Stark To	Wer -
Report Investigation Notes	Та
General information Ca	se Clos
Executive Summary	
Recommended Outcomes for S	subject(s
James Button	Select
Eva Moralas	Calas

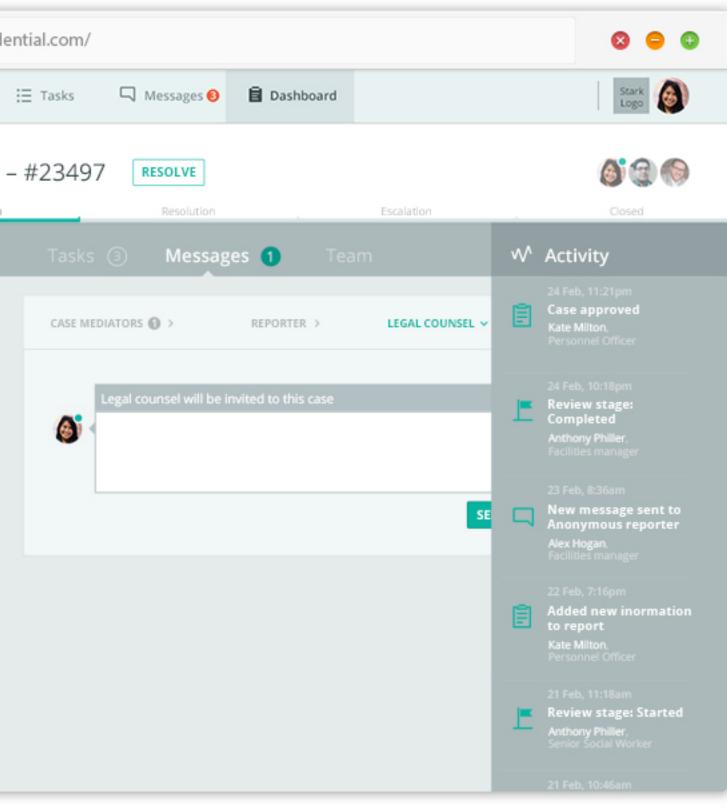




TIMELINE OF INVESTIGATION ACTIVITY

Case activity is automatically logged with date & time stamp

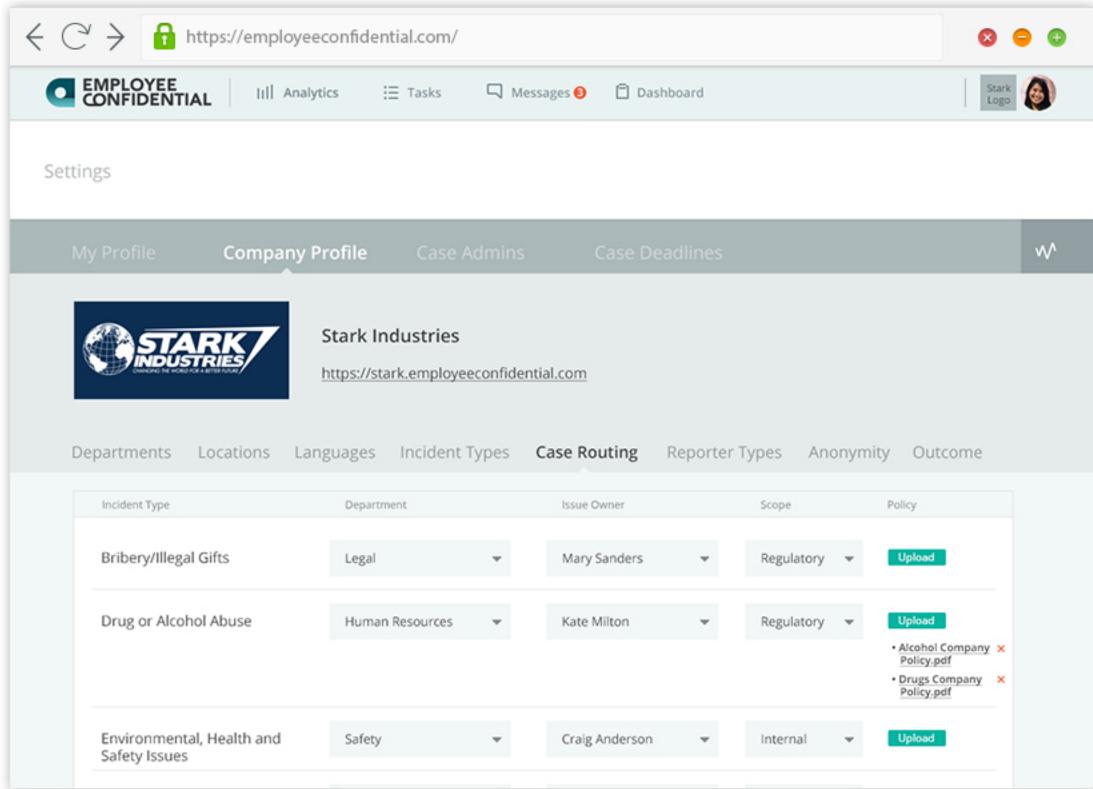
$\leftarrow C' \rightarrow \square$ https://employee.com	fid
CONFIDENTIAL III Analytics	
Thoff Stark Town	
Cases > • Theft – Stark Towe	
🖹 Report summary 🛛 🖂	
Reported: 25 January 2015 Total time: 38 days	Г
Investigation: 31 days 4 days left	
CONTACT REPORTER	
General information	
Reporting from: Canada	
Reporter would like to stay: Anonymous to STARK Enterprizes	
Reporter is: Former employee	
The incident happened in: Stark Tower, NY	
Affected departments: Sales, Accounting	
Parties involved	





COMPLIANCE POLICY MANAGEMENT

- Assign case administrators according to the type of incident and location.
- Flag whether an incident type is a regulatory infringement.
- Link compliance and HR procedural policies to incident types for easy access during the investigation and resolution process.



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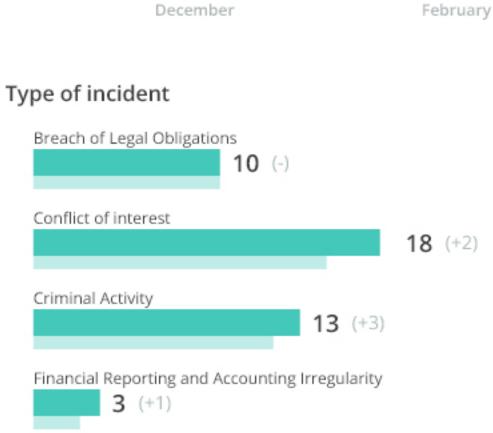
s Incident 1	Types	Case Routing	Reporter 1	Types And	onymity	Outcome	
artment		Issue Owner		Scope	Po	licy	
al	Ŧ	Mary Sanders	Ŧ	Regulatory	-	Upload	
nan Resources	Ŧ	Kate Milton	¥	Regulatory	•	Upload Alcohol Company Policy.pdf	
ety	Ŧ	Craig Anderson	Ŧ	Internal		Drugs Company Policy.pdf Upload	×

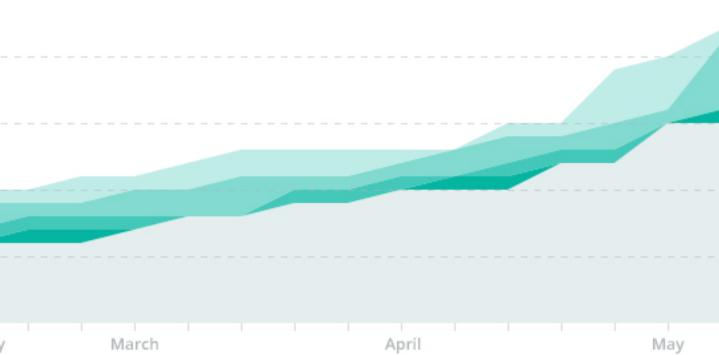


ANALYTICS CREATE CEO & BOARD-READY REPORTS

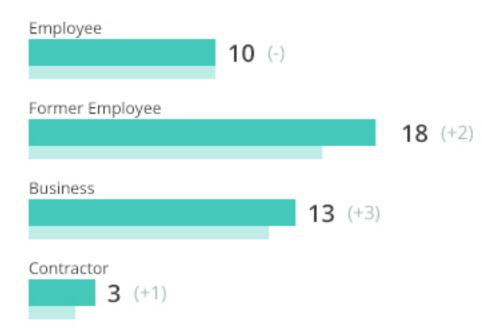
November

- Stages of all cases.
- Case activity by location and department.
- Number of cases by reporter and incident type.





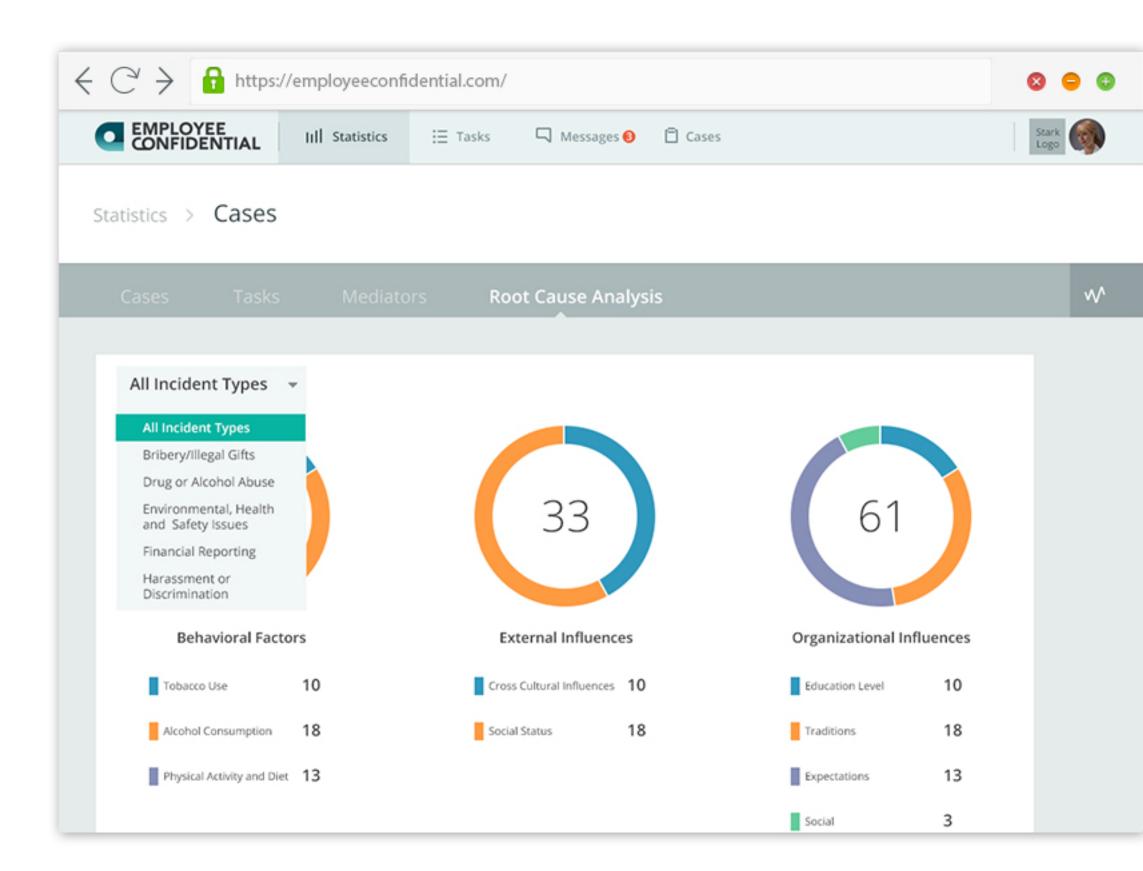
Reporter





ANALYTICS ROOT CAUSE ANALYSIS

Track and report on the behaviors, organizational influences and environmental factors that drive misconduct.





EMPLOYEE AWARENESS

EVERY CLIENT RECEIVES AWARENESS MATERIALS TAILORED FOR THEIR INDUSTRY AND TARGET MARKET

- Downloadable posters for placement in common areas.
- Downloadable wallet-size cards.
- Website & email buttons.



Do the Right Thing

When any questions or concerns arise, the answers are not always clear. You have the responsibility to speak up and we must insure a safe and confidential method of reporting.

IN ANY IAL REPORTIN

Reistication or destruction of financial records Mawprotentiation or suppression of festeroid information Non-adherence to internal financial reporting policy

USPECTED FRAUDULENT ACTIVITY

Embergient

Incides Leading.

BREACHES OF THE CODE, OTHER COMPULANCE POLICIES AND LAWS AND REGULATION

Conflicts of interest Begal, deceptive or anti-competitive sales practices Manipulation of rate or price setting

RETAILATION AGAINST AN INDIVIDUAL WHO REPORTS A CONCERN

Marked manipulation Comupt practices including bribery

Report any violations online: https://employeeconfidential.com/



EMPLOYEE CONFIDENTIAL

REDUCE RISK. CREATE TRUST.

sales@employeeconfidential.com

