

Workplace Investigations Appendix F: Colleague Referral Guidelines

As part of the company's commitment to an ethical workplace and to ensure that the company meets its legal obligations, the company encourages colleagues and associates, subject to local restrictions and guidelines, to report possible violations of business conduct. The company, through its Corporate Compliance department ("Compliance"), responds to these reports. Compliance also tracks these incidents and reports them to the Board of Directors.

Compliance has primary responsibility to ensure that a detailed investigation of any possible violation has occurred. Compliance, therefore, depends on its colleagues in key internal departments to notify our group when these matters arise. These notifications are essential to allow Compliance to track the incident.

These guidelines are intended only to ensure that Compliance learns that the incident has occurred. These guidelines do not replace a business group's existing procedures for investigating these incidents. However, following the guidelines will allow our group to collaborate in investigations when it is appropriate for us to do so.

You will be expected to investigate an allegation of misconduct if it meets each of these requirements:

1. The report is made by an associate, colleague or third-party acting in good faith who genuinely believes that misconduct may have occurred.
2. The report relates to possible associate or colleague misconduct, and the report does not solely relate to a personnel-management issue.
3. On the face of the facts given by the reporter, the manager believes that misconduct may have occurred.
4. It is determined that the relevant facts of the suspected misconduct—regardless of how the reporter characterizes them—fall within one of these incident categories.

Please contact Compliance if you learn of an allegation that an associate, colleague or franchisee may have been involved in any of these:

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