

Corporate Compliance Forms and Tools

Model Compliance Helpline Policy

Function	Effective Date	Pages	Revision Date
Global Compliance	[Effective Date]	3	[Revision Date]

Scope

This Policy applies to [COMPANY NAME] and its subsidiaries (collectively, “[COMPANY NAME]” or the “Company”) and the directors, officers, and employees of such entities as well as those acting for or on behalf of such entities (collectively, “Covered Persons”).

Purpose

The Company has established multiple methods through which directors, officers, employees, and third parties can report potential violations of applicable law, Company Code of Conduct, or policies and can also obtain guidance regarding compliance and ethics questions. This policy describes one of those reporting methods and affirms the Company’s position that retaliation of any type against a person who, in good faith, raises a concern will not be tolerated.

Policy

The Company is committed to high ethical standards and compliance with all applicable laws in all of the jurisdictions in which it operates and requires all Company employees to report potential illegal activity or activities that potentially violate the Company Code of Conduct or its policies. Prompt reporting of possible violations is required as it gives the Company the opportunity to investigate the matter and take corrective action where needed. This allows the Company to reduce the risk of damage to the reporter, their coworkers, the Company, third parties, and/or the communities in which we operate.

The Company has established the Compliance Helpline for (a) the confidential reporting by Company employees and third parties of possible violations of applicable law or Company Code of Conduct or policies, including anonymous reporting where allowed by law; (b) obtaining guidance and clarification of matters related to the Company’s compliance and ethics program; and (c) the receipt, investigation, and management of complaints. An employee who has a good faith belief that a Company employee or someone acting for or on behalf of the Company has violated applicable law, the Company Code of Conduct, or Company policies has a duty to report the matter as promptly as possible.^[1]

Employees and others who report potential issues should feel comfortable reporting issues of potential noncompliance without fear. Retaliation of any type against a person who, in good faith, raises a concern will not be tolerated. Anyone who attempts to retaliate against a person for speaking up will face discipline, up to and

including potential termination from employment.

Submitting a report that is known to be false (made in bad faith) is a violation of the Company Code of Conduct and will result in discipline up to and including potential termination from employment.

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