

### **Diplomat Ethics Line FAQ**

Diplomat is committed to compliance with all applicable federal and state laws, rules and regulations. In an effort to ensure compliance, Diplomat maintains an effective Compliance and Ethics Program. A key component of this program is providing employees, clients, business partners, and shareholders with a means to report non-compliance, illegal or unethical conduct, or other questionable activities.

We believe in creating and fostering corporate culture in which employees are comfortable reporting such conduct directly to their supervisor or another appropriate individual within the company. However, we also recognize that providing individuals with a means to report such conduct anonymously, without any risk of recognition, is also a valuable tool.

To that end, Diplomat has engaged a third-party to provide a secure, confidential Ethics Line by which individuals may anonymously report or inquire about compliance and ethical matters. This document provides essential information related to the Ethics Line, how to use it, how it functions, and what to expect when filing a report or inquiry.

**Question:** How can Diplomat employees report violations of law or company policies?

**Answer:** Employees are expected to promptly report all known or suspected violations of law or company policy. Employees may report such violations to:

- A supervisor
- A manager
- A director
- Executive leadership
- Compliance Officer
- General Counsel
- Human Resources
- Ethics Line

Management will assist you in reporting violations and facilitate in obtaining appropriate advice. By law, Diplomat is not permitted to retaliate against employees who furnish good faith reports of inappropriate activities. Moreover, Diplomat has a strict non-retaliation policy for employees who report non-compliance, illegal or unethical conduct, or similar activities.

Members of the workforce in leadership roles should be aware of their responsibility to provide assistance to any individual inquiring about how to report a potential compliance issue. Leaders should encourage staff to do so in any circumstance and without fear of retaliation. Under no circumstance should a leader suggest a member of the workforce should not, or does not need to, file a compliance report, even such leader believes the issue is being or has already been addressed.

**Q:** What is the Ethics Line?

**A:** The Ethics Line is a tool through which employees can ask questions, report issues, or share concerns in a convenient and completely confidential manner. The Ethics Line is hosted by a third party, so Diplomat has no means of identifying individuals wishing to submit a report or question anonymously. Individuals can report or ask questions 24 hours a day, seven days a week online via a computer or mobile device, by telephone, or by email.

**Q:** What types of concerns should be reported to the Diplomat Compliance Hotline?

**A:** Call the hotline to express concerns or report suspected violations related to:

- Code of Conduct Violations
- Fraud, Waste, or Abuse
- Bribes & Kickbacks
- Conflicts of Interest
- Alteration or Destruction of Diplomat Records or Financial Documents

- Privacy
- Theft
- Harassment
- Confidentiality
- Discrimination
- Safety
- Fraudulent Billing
- Potential Criminal Violations
- Other Violations of Law or Diplomat Policy

**Q:** What concerns should **not** be referred to the Ethics Line?

**A:** The Ethics Line is not to be used to report an immediate threat to person, property or environment. These conditions must immediately be reported as outlined in Diplomat's Emergency Management Policy & Procedure.

**Q:** Do I have to provide my name?

**A:** No. You will be provided with the option to either identify yourself or to remain anonymous. If you choose to identify yourself, your identity will be kept confidential to the fullest extent possible. If you choose to report anonymously, Diplomat will not be able to identify you as submitting a report. We are interested in resolving concerns, not in identifying the individual reporting the issue.

**Q:** How does the Ethics Line work?

**A:** Individuals can use the Ethics Line to file a report or submit a question in a variety of ways:

- Web: [dplo.ethix360.com](http://dplo.ethix360.com) (computer or mobile device)
- Phone: **833.FOR.DPLO** (833.367.3756)
- Email: [dplo@getintouch.com](mailto:dplo@getintouch.com)

If you report via the web, you will be asked a brief series of questions. You do not have to answer all of them, but the more information you choose to provide, the more effectively we will be able to investigate the matter.

Should you call to report an issue or submit a question, you will speak with a third party who will ask you the same brief series of questions. Again, you are not required to answer all the questions, but the more you can or choose to answer, the more helpful it will be to Diplomat's investigation.

When you submit a report or question, you will receive a unique case number. You will be able to use that case number to log back in to the Ethics Line at [dplo.ethix360.com](http://dplo.ethix360.com) and check the status of your report or question, provide additional information, and/or communicate with Diplomat Compliance and Ethics staff anonymously should investigators have any follow-up questions.

**Q:** Are individuals limited in the number of times they can file a report or ask a question?

**A:** No. You may access and utilize the Ethics Line as often as necessary.

**Q:** Will there be a review process after each report is made?

**A:** All reports or inquiries are taken seriously. All are received and reviewed by trained staff at InTouch and then uploaded into the portal for Diplomat Compliance & Ethics staff to review and address appropriately.