

COWI's Hotline on anti-corruption and business ethics

The screenshot shows a web browser window with the address bar displaying 'EthicsPoint - COWI'. The main content area features a 'File a new report' section with two dropdown menus for selecting the country of location and the country where the violation occurred. A large mouse cursor is positioned over the 'Continue' button. To the right, a 'Welcome to the COWI Hotline for anti-corruption and business ethics' section provides instructions on how to use the hotline, confidentiality assurances, and a link to track reports. A sidebar on the right contains links for 'Want to know more?' (Procedure for COWI's Helpline, FAQ, Brochure) and 'About COWI' (Code of Conduct, Values).

The COWI Hotline is set up to help safeguard our values and ensure compliance with internal policies.

What should I do, if I suspect corruption or unethical business behaviour?

1. COWI has an open management culture and you should primarily consult your line management or HR partner if you have a suspicion of corruption or unethical business behaviour.
2. If you do not believe reporting to your line management will work – or you feel uncomfortable doing so – please use the COWI Hotline.

What can I report on through the Hotline?

- Any violation of law, regulations and internal policies
- Misbehaviour with regard to accounting and auditing
- Fraud, theft and conflict of interest
- Unfair bidding procedures and scientific misconduct
- Improper giving or receiving gifts
- Discrimination and harassment
- Violation of environmental protection, health and safety law

How do I use the Hotline?

There are two ways to use the Hotline.

- Use the Website
You can report your concern through the secure website at www.cowi.ethicspoint.com
- Use the 24-hour phone line
The phone line is toll-free and operated in more than 100 languages. Find the relevant national phone number at www.cowi.ethicspoint.com.

What happens after I have submitted a report through the Hotline?

- After you complete your report, you will be assigned a unique code called a “report key.” Write down your report key and password and keep them in a safe place.
- Ethics Points will forward your report to COWI’s Compliance Team, consisting of the Senior Compliance Officer and CSR Manager.
- After a week, it is important that you follow up on your report at www.cowi.ethicspoint.com to see if the Compliance Team needs additional information to

address your concern. You need the report key and password to follow up on the report.

Can I be anonymous?

You can be anonymous, but COWI encourages you to provide your name and contact details, as this will make it easier for COWI to address your concern.

Is the information confidential?

COWI will ensure that the investigation is conducted in a confidential manner to the maximum extent possible with a thorough and complete investigation.

Do I risk retaliation?

COWI will not discharge, suspend, harass or in any manner discriminate against employees using the hotline with respect to good faith reporting.

Where can I find the Hotline and the phone numbers?

Find more information at www.cowi.ethicspoint.com.

LRN Helpline You are now in an EthicsPoint Secure Area | File a Report

You are currently in the confidential and secure reporting structure of the LRN Helpline. In collaboration with EthicsPoint Below are the choices available to you.

COWI
The unethical systematic recording and analysis of the business and financial transactions associated with generally accepted accounting practices. (Examples include: misstatement of revenues, misstatement of expenses, misstatement of assets, misapplications of GAAP principles, wrongful transactions.)

- Accounting and Auditing Matters**
- Conflict of Interest**
A conflict of interest is defined as a situation in which a person, such as a public official, an employee, or a professional, has a private or personal interest sufficient to appear to influence the objective exercise of his or her official duties. (Examples include: inappropriate vendor relations, bribery, misuse of confidential information, inappropriate customer relations.)
- Disclosure of Confidential Information**
Unauthorized and unlawful disclosure of corporately owned intellectual property or trade secrets, as well as employee, customer or consumer information, marketing and other corporate data bases, marketing plans, business proposals and strategies.
- Discrimination or Harassment**
Uninvited and unwelcome verbal or physical conduct directed at an employee because of his or her sex, religion, ethnicity, or beliefs.
- Environmental Protection, Health or Safety Law**
Violation of any environmental law, regulation, corporate policy or procedure with respect to the handling and disposal of hazardous materials or the health and safety of other individuals.
- Fraud**
Improper, misleading or deceptive actions taken, falsification of records, or misrepresentation of physical conditions.
- Improper Giving or Receiving of Gifts**
The giving, receiving or solicitation of items which could be reasonably interpreted as an effort to influence a business relationship or decision. Items given, received or solicited for the benefit of an individual or an individual's family or friends, items given, received or solicited during or in connection with contract negotiations, the acceptance of cash, checks, money orders, vouchers, gift certificates, loans, shares or stock options.
- Misconduct or Inappropriate Behavior**
Intentional wrongdoing, specifically: deliberate violation of a law or standard.
- Scientific Misconduct**
Fabrication, falsification, plagiarism, or other practices that seriously deviate from those that are commonly accepted within the scientific community for proposing, conducting, or reporting research. Fabrication is making up data or results and recording or reporting them. Falsification is manipulating research materials, equipment or processes, or changing or omitting data or results, such that the research is not accurately reported in the research record. Plagiarism is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.
- Theft**
The act of stealing, specifically: the heinous taking and removing of personal property with intent to deprive the rightful owner of it.
- Unfair bidding practices**
Engagement in action amongst bidders designed to influence the bidding process and prevent the client from conducting a fair and open process.
- Unsafe working conditions**
Failure of meeting requirements needed to perform all duties in a secure environment. Potential areas of harm. (Examples include: environmental hazards, OSHA, occupational health, fire, hazardous materials.)

After stating which country you are reporting from, you will be asked to select the category that is relevant for your concern...

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LRN HELPLINE IS NOT AN EMERGENCY SERVICE
Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

Yes - I agree to the Terms and Conditions of making this report.

Please provide information as follows:
(* Required fields)

Organization/Tier: **COWI**
Location where incident occurred:
City: _____ State/Province: _____
Zip/Postal Code: _____
Country: Czech Republic

* Are you an employee of COWI?
 Yes No

* Do you wish to remain ANONYMOUS for this report?
 Yes No

If you want COWI to know your identity, please complete the following:
Your Name: First Name: _____ Last Name: _____
Your Phone Number: _____
Your E-mail Address: _____
Best time for communication with you: _____

Report - Disclosure of Confidential Information

* Please identify the person(s) engaged in this behavior:
Example: _____

...and then fill out a detailed report. The report is submitted directly from the website.



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