

# Ethics Help Line Questions & Answers

## 1. What is the purpose of the Ethics Help Line?

Maintaining the Ethics Help Line is simply good business. The Ethics Help Line is a reporting mechanism that provides an avenue for personnel and external stakeholders to anonymously report potential breaches of the Code of Business Conduct. It also serves as a means to enhance corporate governance practices and provides personnel, business partners and investors with additional assurance that the Company has systems in place to reduce and prevent breaches of Husky's Code of Business Conduct.

The Ethics Help Line reinforces Husky's alignment with legislative requirements for publicly-traded companies to establish procedures for the collection and resolution of complaints covering a broad range of financial and accounting control issues.

## 2. Who is the external provider or host of the Ethics Help Line?

Husky has contracted the hosting and operation of the anonymous reporting system to NAVEX Global, a company which provides systems for corporate governance and risk compliance. NAVEX Global's hotline service, EthicsPoint, is used by organizations worldwide. The servers that handle Husky's reports are based in the United Kingdom.

## 3. How do you file a report with the Ethics Help Line?

Reports may be filed in two ways: by calling a toll-free telephone number, or online through a web-based reporting system.

Information on how to file a report is provided under the [Ethics Help Line](#) section of Husky's website. Personnel may also access the Ethics Help Line internally through HuskyNet.

Individuals choosing to use the toll-free telephone option will speak directly with an EthicsPoint operator. Operators use a standard list of questions to help callers file their report. No personally identifiable information is collected unless you choose to disclose it.

Individuals choosing to use the [online system](#) are notified they are leaving Husky's corporate network and being redirected to a website hosted by EthicsPoint. Once on the EthicsPoint site, reporters are asked a series of questions to identify the type of report being filed and to gather information necessary to conduct an investigation.

## 4. What types of reports can be filed?

The primary purpose of the Ethics Help Line is to serve as a mechanism to report perceived breaches of Husky's Code of Business Conduct. As such, reports may be filed under eight categories which are aligned with sections of Husky's Code of Business Conduct: Compliance with Laws; Conflict of Interest; Proper Record Keeping; Political Contributions; Company Resources; Fair Competition; Bribery or Other Offering of Payments; and Accepting Payments and Entertainment.

Additional categories are provided for Human Resources, Health Safety & Environment and Other, for reports which may not fall under the stated categories, or when the reporter is uncertain of the correct category.

The primary purpose of the Ethics Help Line is to accommodate reports which fall within the scope of the Company's Code of Business Conduct. It is not meant to serve areas where Husky already has established processes in place, such as the Diversity and Respectful Workplace claim process.

## **5. What happens once you file a report?**

You will be assigned a unique report key by EthicsPoint and prompted to create a password, which will allow you to check on the status of your report.

EthicsPoint will forward the information gathered to the Ethics Help Line administrator at Husky. A case manager will conduct a preliminary assessment to determine if action is warranted.

If it is determined a report requires further investigation, a formal review will be launched. The Ethics Help Line sponsors – representatives from legal, corporate security, human resources, health, safety and environment and internal audit – will conduct the review and determine appropriate action.

You are encouraged to check on the status of your report or submit more information pertaining to your report. Additional information may be required to conduct an investigation. Given the anonymous nature of the reporting system, the Ethics Help Line serves as the only method of communication with the reporter. As such, this is where you would view any follow-up questions posted by the Ethics Help Line sponsors.

## **6. Who are the Help Line Sponsors?**

The Ethics Help Line sponsors are representatives from legal, corporate security, human resources, health, safety and environment and internal audit. When necessary, they may be authorized to bring in external expertise.

## **7. Will I have to disclose my identity?**

No. All reports can be filed anonymously; however, you may provide your name and contact information if you choose.

## **8. How long will it take for a case to be closed?**

The length of an investigation will vary depending on its complexity. The Ethics Help Line sponsors will endeavor to conclude investigations in a timely manner.

## **9. Will I be informed of the results of an investigation and any action taken?**

No. You will be informed through EthicsPoint when an investigation has been concluded. Due to privacy and legal concerns, the results of an investigation will not be disclosed.

If it is determined legal action is required, it is possible details of a case may become public knowledge through normal court proceedings.

**10. Will any action be taken if a report is deemed to have been filed in bad faith or found to be without merit?**

A bad faith complaint is one filed by a person (1) knowing that it is false or misleading or knowing that there is not a sufficient preliminary indication of breach or non-compliance, or (2) solely to intentionally harm any person or entity associated with Husky. Husky may take disciplinary action against personnel who file bad faith complaints.

A report filed by someone who believes it to be true, although not ultimately proven through investigation, is not a bad faith complaint and no action will be taken.

Husky's policy prohibits retaliatory action against any personnel who, in good faith, reports a possible violation. Disciplinary measures may be taken against personnel if they participated in prohibited activity, even if they reported it.

**11. Will reports be accepted through means other than the Ethics Help Line?**

Yes. The Company will investigate any reported Code breaches, whether they are received by letter, phone or other means.