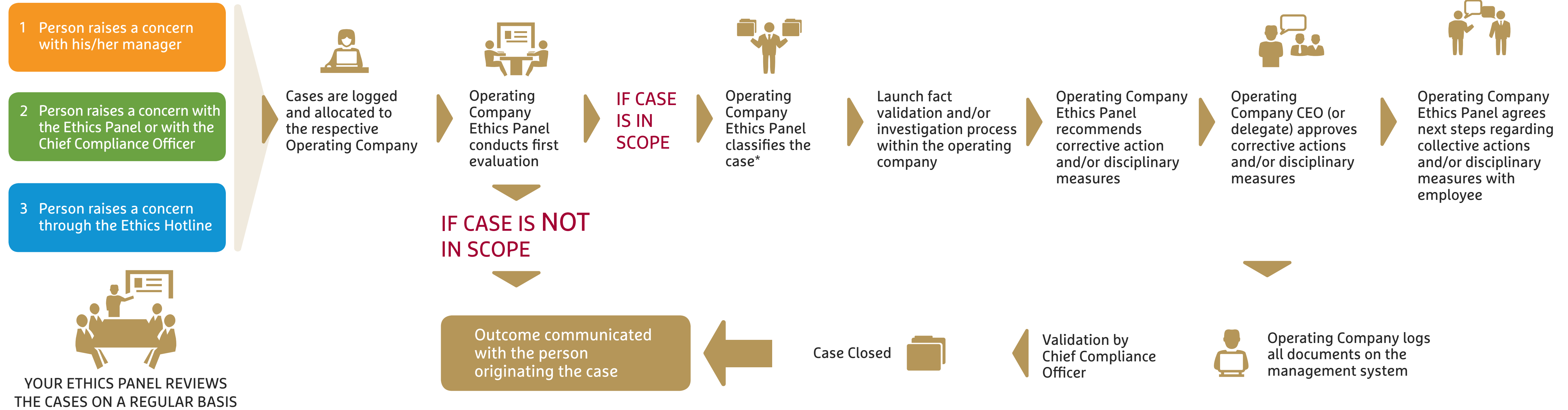


Ethics Hotline Process

OPTIONS FOR REPORTING A POTENTIAL CASE



ROLES AND RESPONSIBILITIES

OP CEOs and Chief Compliance Officers: Oversee the process and approve any disciplinary and/or corrective actions

Ethics Panel: Report to the OP CEO and sponsor and lead the Ethics Hotline and process

Risk Manager: Member of the Ethics Panel, he/she owns the case management process

*If deemed critical, the case is reported immediately to the CEO (or delegate)