

Retaliation and Coercion

Hill fosters an environment of open communication. All employees are encouraged to speak up, ask questions and raise concerns. Employees are also expected to report misconduct, ethical violations, and unsafe work conditions, and to assist in investigations as needed.

Hill strictly prohibits any form of retaliation against any employee who, in good faith, voices a concern, makes a complaint, reports misconduct, reports an illegal act or violation of company policies or procedures, or participates in an investigation.

Hill similarly prohibits any form of coercion or other attempt to discourage or interfere with an employee making a good faith complaint or report of misconduct or illegal act, or assisting in an investigation. Violators will be subject to disciplinary action, up to and including termination.

What if you witness a Code of Ethics violation or are asked to engage in conduct that violates the Code of Ethics and Business Conduct? What should you do?

You should report it. It is not only your right to express your concerns, it is your responsibility. The company will treat your information as confidential and you may remain anonymous if you prefer. In any case, company policy prohibits direct or indirect retaliation against anyone who reports a violation of the Code of Ethics and Business Conduct, company policies and procedures, or the law.

What if you do not feel comfortable reporting suspected violations to the OpenLine? Your co-workers have warned you that if you report something, you will be retaliated against.

Reports made via phone or online to the OpenLine are kept confidential and may be made anonymously. The identity of the caller will not be given to anyone except as required by law or as needed for investigation purposes. Any employee who retaliates against another employee, customer, or supplier for submitting a question or report of a suspected violation will face disciplinary action up to and including termination.

Supervisors/Foremen - Please share this message with employees who do not have computer access. Post it for employee review.