



Code of Business Ethics Activity

Code of Business Ethics Breaches	2021	Industry Benchmark
Number of reports per 100 employees	1.92	1.7
Substantiated cases (%) [*]	34%	44%

* Substantiated Cases includes fully and partially substantiated outcomes. Additionally, all substantiated cases result in corrective action. Corrective action includes but is not limited to coaching, discipline up to and including termination of employment, process and internal control reviews, policy improvements, and communication to reinforce expectations.

Code of Business Ethics Breaches by Type (in percent of cases reported)	2021	Industry Benchmark
Accounting, Auditing & Financial Reporting	0%	2%
Business Integrity	3%	26%
HR, Diversity & Workplace Respect	74%	55%
Environment, Health & Safety	16%	11%
Misuse, Misappropriation of Corporate Assets	7%	4%