

Anonymous Reporting Frequently Asked Questions

Is ProPartners currently experiencing an ethical issue that promoted the need for a reporting system?

No. ProPartners is simply complying with the spirit of the Sarbanes-Oxley legislation to ensure the organization continues to maintain an honest and ethical workplace.

What assurances are there regarding anonymity and confidentiality?

Ethicspoint is a third-party reporting system that was built to protect the anonymity of the reporter. The company is dedicated to this task and ProPartners and Compeer Financial are contractually bound not to seek the identity of any reporter. Reports are protected by the latest encryption technology and the website does not track or capture screen names or computer addresses (cookies). Additionally, reporters may file reports using the website or via a toll-free phone number. Any person who files a complaint or tip will not be subject to retaliation or retribution from ProPartners, Compeer or any of their employees.

What should I report?

The following lists example concerns should be reported via Ethicspoint.

- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the association.
- Fraud or deliberate error in the recording and maintaining of financial records of the association.
- Significant deficiencies in or noncompliance with internal controls.
- Misrepresentation or false statements to or by a senior officer or accountant regarding a matter contained in the organization's financial records, financial reports or audit reports.
- Deviation from full and fair reporting of the organization's financial condition.
- Fraud or deliberate error in the creation of any customer loan agreement, collateral statement, loan application or other contractual matters.
- Fraud or deliberate errors in the creation of any vendor or business partner contract or other legal matter.
- Fraud or deliberate errors in the payment of invoices to vendors and similar behavior when ProPartners' funds are spent or distributed.
- Embezzlement or theft of company property.
- Any criminal activity like distribution or consumption of narcotic drugs, gambling and bookmaking on company time or company property.

Ethicspoint is NOT a 911 or Emergency Service and should not be used in emergency situations.

How do I file a report?

Reports may be filed conveniently using one of the following options:

Toll Free Phone Number

1-866-294-3564

Hotline is available 24 hours per day, 7 days per week. A compliance specialist from Ethicspoint will assist you in entering your report into the Ethicspoint system. Telephone calls are not recorded.

Online

https://secure.ethicspoint.com/domain/en/report_company.asp?clientid=7369&override=yes&agreement=no

Or visit <http://www.ethicspoint.com> and navigate to Compeer Financial. Click on the **File a Report** link in the header.

What happens after a report is filed with Ethicspoint?

Reports are entered directly on the Ethicspoint secure server to prevent any possible breach in security. Ethics point makes these reports available to Compeer's Director of Internal Audit and one other person who is charged with evaluating the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence. After they have reviewed, they will contact the ProPartners Senior Management Team as appropriate. The Ethicspoint system and staff are trained and committed to ensure no report is ever shared with implicated parties, their peers or subordinates.

What if I have something to add to the report after it is filed?

When a report is filed, you will receive a unique username and are asked to choose a password. You may return to the Ethicspoint system via the website or telephone and access the original report to answer questions or add further information that would help resolve open issues. We strongly suggest you return to the site within three to five business days to answer any questions that may arise from the investigation.

If you have further questions or would like more information on Ethicspoint or internal fraud reporting, please contact us at info@ppfcredit.com.