

## The United Auto Workers (UAW) International Ethics Hotline

### *Frequently Asked Questions*

**Please note:** The UAW International Ethics Hotline (“Ethics Hotline”) is not the appropriate channel for reporting events presenting an immediate physical threat to people or property. In the case of such an emergency, the relevant local emergency service should be immediately contacted.

Q: What is the purpose of the Ethics Hotline?

The Ethics Hotline is meant to protect the UAW and its members by promoting business integrity and transparency; the focus is on identifying, investigating, and remediating ethical violations and financial misconduct by UAW International officials, staff, or employees, including actions that involve fraud, theft, improper use of Union resources, conflicts of interest, and self-dealing like bribes, kickbacks, or steering contracts for personal gain.

The Hotline is available as a direct and secure line of communication to report a concern or make an allegation of possible ethical misconduct. The UAW will take steps to preserve the confidentiality of the person making the report, and to ensure that individuals filing a report in good faith will not suffer retaliation in the form of harassment or adverse employment and career consequences.

Q: Does the UAW have a Code of Ethics?

Yes. As relevant to the Ethics Hotline, the UAW’s main values and principles relating to business integrity and ethical conduct are set forth in the Ethical Practices Codes of the UAW Constitution at pages 134-37 (available at <https://uaw.org/wp-content/uploads/2019/01/2018-UAW-Constitution.pdf>), and in related pronouncements contained in various UAW Administrative Letters. The Ethics Hotline serves as one way for someone to confidentially report conduct that violates these values and principles.

Q: What does the UAW’s Ethical Practices Codes say?

Here are some relevant requirements from the Ethical Practices Codes that apply to all UAW officials:

- That Union funds are spent for proper purposes.
- That the Union shall not permit any of its funds to be invested in a manner that results in the personal profit or advantage of any officer or representative of the Union.
- That there shall be no contracts of purchase or sale or for rendering services which will result in the personal profit or advantage of any officer or representative of the Union. Nor shall any officer, representative, or employee of the Union accept personal profit or special advantage from a business with which the Union bargains collectively.
- That the Union shall not make loans to its officers, representatives, employees, or members, or members of their families, for the purpose of financing the private business of such persons.
- That the Union shall conduct its proprietary functions, including all contracts for purchase or sale or for rendering housekeeping services, in accordance with the practice of well-run institutions, including the securing of competitive bids for major contracts.
- That no Union officer, representative, or employee shall accept “kickbacks,” under-the-table payments, valuable gifts, lavish entertainment, or any personal payment of any kind, other than regular pay and benefits for work performed as an employee from an employer with

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which the Union bargains, or from a business or professional enterprise with which the Union does business.

- That no Union officer shall have a personal financial interest that conflicts with her/his Union duties.

Q: Who can use the Ethics Hotline to report concerns?

The Ethics Hotline is available to officials, staff, and employees of the UAW International, members of associated Local Unions, and third parties who work with or have professional interactions with UAW International officials, staff, and employees, such as vendors, contractors, and partners, any of whom knows of information relating to financial malfeasance or ethical misconduct by International Union officials, staff, or employees.

Q: I'm an official, staff member, or employee of the International Union. Is the Ethics Hotline my only way to report potentially unethical conduct by UAW International officials, staff, or employees?

No. There could be several other ways to report unethical conduct that may make more sense for you depending on your circumstances. For employees or staff of the UAW International, in most cases, such information should be reported to resources closest to the situation, such as the person's supervisor or boss. Alternatively, UAW International officials, staff, and employees may be able to address their concerns (depending on the nature) to the UAW International Legal Department c/o Niraj R. Ganatra, General Counsel ([nganatra@uaw.net](mailto:nganatra@uaw.net) or (313) 926-5216).

The Ethics Hotline is for instances where individuals may not feel comfortable sharing their concerns through the more traditional means described above, such as where the employee's manager is involved in the unethical conduct.

Q: I'm a Local Union member or official. Is the Ethics Hotline an appropriate way for reporting potentially unethical conduct by UAW International officials and employees?

Local Union members can share their concerns with the UAW President's Office at (313) 926-5201. Local Union Members can also report their concerns through the Ethics Hotline

Q: What specific kinds of misconduct are meant to be reported through the Ethics Hotline?

The Ethics Hotline is currently meant to receive and refer for investigation concerns focused on ethical and financial misconduct. Some examples are:

- misuse of Union funds
- kickbacks or bribery
- theft of money or property
- conflict of interest
- embezzlement
- falsification of contracts or records
- fraud
- malfeasance or abuse relating to accounting records, auditing, or internal controls
- improper giving/receipt of gifts to/from employer(s)
- steering contracts to an individual or company for personal gain, and other self-dealing
- personal use of Union funds or resources

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- compliance and regulatory violations
- abuse of benefits
- other violations of the Ethical Practices Codes or Administrative Letters

Q: Should I use the Ethics Hotline to report potential misconduct by Local Union officials, management, and employees?

The Ethics Hotline is meant for ethical concerns relating to officials, staff, or employees of the International Union, not Local Union officials, management, or employees. If your concern is clearly unrelated to an International Union official, staff member, or employee, the Ethics Hotline is not the right reporting channel. Such concerns are handled through existing processes under the Offices of the UAW International President and UAW International Secretary-Treasurer, which are described generally in the UAW Constitution: <https://uaw.org/wp-content/uploads/2019/01/2018-UAW-Constitution.pdf>. Such concerns should be directed to the UAW President's Office at (313) 926-5201. However, if the possibility exists that an issue or complaint may have some nexus to the International Union, or if the Local or Regional UAW official also maintains a role with the International Union, that information is encouraged to be shared through the Ethics Hotline.

Q: Should I use the Ethics Hotline to report issues or complaints by one Local Union member about another Local Union member?

No, issues or complaints between Local Union members should be handled in accordance with Article 31 of the UAW Constitution at <https://uaw.org/wp-content/uploads/2019/01/2018-UAW-Constitution.pdf>.

Q: Should I use the Ethics Hotline to raise concerns about the grievance process?

No, the appropriate avenue for raising concerns relating to the grievance process is outlined in Article 33 of the UAW Constitution at <https://uaw.org/wp-content/uploads/2019/01/2018-UAW-Constitution.pdf>.

Q: Should I use the Ethics Hotline to raise concerns about a Local Union election?

No, the appropriate avenue for raising concerns relating to a Local Union election is outlined in Articles 33 and 38 of the UAW Constitution at <https://uaw.org/wp-content/uploads/2019/01/2018-UAW-Constitution.pdf>.

Q: Should I use the Ethics Hotline to raise employment-related concerns, such as performance management, improper workplace relationships, insubordination, lack of professionalism, or other human resource policy or procedure concerns?

No, concerns relating to human resources policies and procedures should be directed to the UAW International Human Resources & Security Department at (313) 926-5204.

Q: Should I use the Ethics Hotline to raise concerns about harassment or discrimination?

No, concerns involving harassment or discrimination should be directed to the UAW International Human Resources & Security Department at (313) 926-5204, or to the UAW International Legal Department at (313) 926-5216.

Q: Should I use the Ethics Hotline to raise concerns related to physical security or personal safety, or environmental concerns?

No, concerns relating to personal safety, physical security, or environmental matters should be directed to the UAW International Human Resources & Security Department at (313) 926-5204. Emergencies should always be reported immediately to the appropriate authorities, including 911.

Q: Should I use the Ethics Hotline to raise concerns about substance abuse issues involving me or an International Union official or employee?

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No, substance abuse issues should be directed to the UAW International Human Resources & Security Department at (313) 926-5204.

Q: What happens if I report a matter to the Ethics Hotline that should be handled through one of the separate channels mentioned above?

You will be contacted and directed to report your information through the appropriate channel, and your report will be forwarded to the appropriate Union office.

Q: I've determined that the conduct I wish to report is appropriately raised through the Ethics Hotline. How do I file a report?

The Ethics Hotline can be reached through either of the methods listed below. Note that both methods of submitting a report are independently administered and external to the UAW International:

- Dial the following toll-free number: (866) 830-0006
- Visit the following website to complete a brief online form: [www.lighthouse-services.com/uaw](http://www.lighthouse-services.com/uaw)

Q: Who operates the Ethics Hotline?

UAW International has contracted with Exiger LLC, a highly experienced and reputable third party, to run the Ethics Hotline. With respect to the Hotline reporting and investigation process, Exiger is also currently fulfilling the role of "Ethics Ombudsman."

Exiger uses Lighthouse Services, a third-party hotline service provider staffed with trained intake professionals, to receive incoming calls and to host the web-based Ethics Hotline reporting platform. All reports from the Ethics Hotline, whether submitted by phone or through the website, go to Exiger for review and investigation, overseen by the UAW's external Ethics Officer.

Q: Why does the UAW International use a third party to administer the Ethics Hotline?

Using a third-party provider helps to provide confidentiality for anyone making a report and is a recognized best practice for ethics and compliance hotlines.

Q: What is Exiger?

Exiger is a global compliance and ethics investigative firm whose staff has decades of experience on ethics and integrity-related matters. Exiger's staff includes former federal and state prosecutors, former federal and state law enforcement officials, and forensic investigators. For more information about Exiger, please visit [Exiger.com](http://Exiger.com).

Q: What are the Ethics Hotline's operating hours?

The Ethics Hotline is available 24 hours/day, 7 days/week, 365 days/year.

Q: Is the Ethics Hotline anonymous?

The Ethics Hotline is confidential, but not anonymous. A person filing a report will be required to provide his/her name and contact information in order for the report to be processed. This is necessary to help ensure that there is no retaliation against good faith claims, to avoid bad faith claims, and to facilitate the investigative process. All reasonable steps will be taken to preserve the confidentiality of reports, including the identity of any person(s) raising an ethics concern, whenever possible.

Q: Will my identity and report be treated confidentially if I submit a report to the Ethics Hotline?

Yes. All reasonable steps will be taken to preserve the confidentiality of reports submitted to the Ethics Hotline, including the identity of any person raising an ethics concern, whenever possible.

Note that Exiger will disclose each report and the identity of the person filing the report directly to the UAW's external Ethics Officer, who will also maintain confidentiality whenever possible. In some cases,

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the Ethics Officer may determine that disclosure to the UAW International General Counsel or his/her designee is necessary to ensure that the International Union can fully investigate, discharge its legal and fiduciary duties, and review its operations as necessary. The process above is designed to protect the integrity of the UAW International and its officials and employees by ensuring a fair and appropriate investigation of each report, as well as appropriate remedial action or discipline when warranted.

Also note that the reporting of emergency situations over the Ethics Hotline may require immediate disclosure to law enforcement or emergency authorities, or to the UAW International General Counsel. This may include but is not limited to:

- threats of imminent violence;
- threats to Union property;
- allegations of child pornography;
- allegations of past violence; and
- any information that, in Exiger's, the Ethics Officer's, and/or the UAW International's judgment, represents a serious and imminent threat to person, property, or the UAW's reputation and integrity.

Q: If I'm an official, staff member, or employee of the UAW International, can I lose my job or otherwise be subjected to negative employment consequences if I submit a good faith report to the Ethics Hotline?

No, the UAW International is fully committed to ensuring that no official, staff member, or employee who submits a Report in good faith suffers retaliation in the form of harassment or adverse employment and career consequences.

Q: What happens if someone deliberately submits materially false information to the Ethics Hotline?

Anyone filing a complaint concerning a violation or suspected violation of the Ethical Practices Codes or other improper conduct must do so in good faith and have reasonable grounds to believe the information disclosed is true. The UAW International reserves the right, subject to notice, investigation, and due process, to discipline persons who use the Ethics Hotline to make bad faith, knowingly false, harassing, or malicious complaints.

Q: How will the UAW International know if someone deliberately submits materially false information to the Ethics Hotline?

Exiger will screen all reports made to the Ethics Hotline and investigate the report, using staff who bring decades of experience in interviews and investigations related to ethics and compliance. Exiger will present its findings to the UAW International's external Ethics Officer, who will then determine what action, if any, is appropriate, which may include directing that additional investigation be conducted. The investigation process is designed to weed out false or spurious reports.

Q: Who is the Ethics Officer and what is his or her role?

On March 19, 2020, the UAW International appointed Wilma Liebman as its Ethics Officer. Ms. Liebman is a distinguished public servant and expert in labor policy whom President Barack Obama previously appointed to serve as the Chairman of the National Labor Relations Board (NLRB), and who served on the NLRB under both Republican and Democratic administrations before being appointed the Chair. The Ethics Officer is empowered to investigate allegations, complaints, or matters referred to her by Exiger or otherwise, and to hold hearings at her discretion.

If the Ethics Officer finds that an actionable violation has occurred, the Ethics Officer will, at her discretion, draft a report and recommendation—directed to the official or entity with responsibility over the person(s) who engaged in the violation—for consideration of remedial steps or discipline. At her

discretion, the Ethics Officer may send reports where no disciplinary action is warranted to either the appropriate UAW authority (*e.g.*, Executive Board, President, General Counsel) with information on any systemic issue identified, and/or recommendations for policy or procedure considerations to avoid future misconduct, and may request an update or response from the appropriate UAW authority on any steps so taken.

Q: What information will an employee need when he/she is ready to file a report?

It is best to have as much information as possible when filing a report. Valuable information includes:

- Your name, contact information, and the best time you can be reached
- The nature of the conduct or concern at issue, including the nexus to a UAW International official, staff member, or employee
- The identity of the person(s) engaged in the conduct
- The location(s) where it occurred
- A detailed description of the behavior/situation, including any details that could be helpful in the investigation and resolution of the matter
- When the behavior or situation began/occurred
- How you learned of the behavior or situation
- Your relationship to the person(s) at issue
- Your relationship to the UAW
- Whether you or anyone else previously communicated this concern to anyone else
- Whether you or anyone else previously reported this concern to supervision or management
- Whether you or anyone else reported this concern to anyone outside the UAW
- Any other person(s) who may be aware of the behavior or situation
- Any documents, emails, files, or other materials that support your report

Q: What happens when I call the toll-free number?

Incoming callers will hear an introductory recorded greeting. By pressing 1 on the dial pad, the person filing the report will be routed to a live intake specialist who will ask a series of questions to complete the report. The report is complete once the responses are documented, at which point the intake specialist will provide the person with a report number. Within 24 hours, the report will become accessible to Exiger for screening and investigation.

Q: What if I remember something important about an incident after I've submitted a report?

After submitting a report, an individual will have the option to call the Ethics Hotline to update the report. To do so, the person who filed the report must supply his/her report number. A series of recordings will guide the person to a live intake specialist who will document his/her information.

Q: What happens when I visit the Ethics Hotline website?

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The website explains the purpose of the Ethics Hotline, with the option to submit a report or view UAW International documents that provide more information about the UAW's ethical policies and practices, including how the Ethics Hotline works.

Clicking "submit" under the "report an incident or misconduct" icon takes the person filing the report to a page with a series of questions. All required fields must be filled out. Once the person filing the report fills in the reporting form and clicks submit, the report is complete and will be forwarded to Exiger.

Q: What resources are available on the Ethics Hotline website?

The website contains this FAQ and the UAW Constitution.

Q: Can I file a report in another language?

At this time reports can be filed only in English, but we expect to add a Spanish language option in the near future.

Q: What happens after I file a report?

After an initial review, Exiger will establish the nature of the report.

Exiger will contact the person filing the report via email or phone within three business days of receiving the report; the email will originate from an Exiger email address. Exiger may request documents related to the case, additional details, or clarification of the information presented, and, if so, will ask that the person who filed the report respond within one week.

With the knowledge of the external Ethics Officer, Exiger will close out reports that are not within the scope of the Ethics Hotline, will contact the person who filed the report via email to inform him/her of appropriate resources and reporting route for the particular complaint made, and will forward the report to the appropriate Union office.

Q: After I've filed a report, when can I expect to hear from Exiger?

As previously noted, you should generally expect an acknowledgment by email within three business days of Exiger's receipt of the report. The email will originate from an Exiger email address.

Q: What happens next?

As part of its investigation, Exiger may schedule and conduct an interview with the person who filed the report, interview anyone else relevant to the reported conduct or situation, collect and review documents or data, and perform any appropriate follow-up investigation based on information obtained through its interviews, document review, and other forms of due diligence.

Q: How are interviews held?

Interviews will occur in-person or over the phone. Exiger will make every effort to have at least two interviewers present. In-person interviews will generally be conducted outside the UAW International's premises. During the course of the interview, Exiger personnel will take notes by hand or on a computer.

Given the sensitive and/or complex nature of some reports, interviews may be conducted over the course of more than one phone call or in-person meeting. In addition, where applicable, the sequence of interviews may be coordinated with the Ethics Officer and the UAW International General Counsel (or his/her designee) to limit business disruption and mitigate any impact on interviewees.

Q: If I'm interviewed, what happens next?

Both before and after your interview, Exiger will investigate the report as appropriate. As previously described, Exiger may, as necessary, interview anyone else relevant to the report, collect and review documents and data, and perform any follow-up investigation based on information obtained through its interviews, document review, and other forms of due diligence.

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Within seven business days of the investigation concluding, Exiger will draft and provide to the Ethics Officer a preliminary report detailing investigative steps taken and factual findings.

If the Ethics Officer finds that an actionable violation has occurred, the Ethics Officer will, at her discretion, draft a report and recommendation—directed to the official or entity with responsibility over the person(s) who engaged in the violation—for consideration of discipline and/or remedial steps. At her discretion, the Ethics Officer may send reports where no disciplinary action is warranted to either the appropriate UAW authority (*e.g.*, Executive Board, President, General Counsel) with information on any systemic issue identified, and/or recommendations for policy or procedure considerations to avoid future misconduct, and may request an update or response from the appropriate UAW authority on any steps so taken. The Ethics Officer may also hold hearings at her discretion.

Q: How long will this process take?

There is no set timeline for the review and investigation of a report, and any resulting remedial or disciplinary action. Each case will vary depending on any number of factors, such as the report's sensitivity, complexity, and the availability of witnesses and evidence.

Q: What happens if I'm submitting a report that relates to conduct by the external Ethics Officer?

To avoid conflicts, reports containing allegations against the Ethics Officer shall be communicated to and discussed with the UAW International's General Counsel (copying the UAW President).

Q: What happens if I'm submitting a report that relates to conduct by the UAW International General Counsel or his staff?

To avoid conflicts, reports containing allegations against the UAW International General Counsel or members of the UAW International Legal Department shall be communicated to the Ethics Officer and to the UAW President.