

About EthicsPoint  
Reporting - General  
Reporting Security & Confidentiality  
Tips & Best Practices

## About EthicsPoint

### What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool designed to assist management and employees in addressing fraud, abuse, or other misconduct in the workplace.

### Why do we need a system like EthicsPoint?

- We believe in creating open channels of communications, and in many instances, an employee's first step if they believe an inappropriate action has taken place that is in conflict with our [Code of Conduct](#) or core values should be to contact their manager and/or John Whiting (compliance officer) or Denise Smith-Hams in Human Resources. However, it is important that we have other avenues to report violations and EthicsPoint can serve as that resource.
- Additionally, because we are part of Alphabet, and Alphabet is a publicly traded company, by law, we are required to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

## Reporting - General

### May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via the telephone or the Internet.

### What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our stated Code of Conduct.

### If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our leadership team, specifically John

Whiting who is our compliance officer and/or Denise Smith-Hams, head of Human Resources. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. We have partnered with EthicsPoint for these situations; we would rather you report anonymously than keep the information to yourself.

**Why should I report what I know?**

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment.

**Does management really want me to report?**

We certainly do. We are all responsible for the health and success of our organization in the near-and longer-term. It's not possible for leadership to see and know about everything so we rely on employees as well to report violations to our code of conduct. Your reporting can minimize the potential negative impact on the company and our employees.

**Where do these reports go? Who can access them?**

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report based on 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.

**Isn't this system just an example of someone watching over me?**

The EthicsPoint system is for you and provides an opportunity to report inappropriate behavior in a manner that can preserve your anonymity if you would like. The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

## **Reporting Security & Confidentiality**

**It is my understanding that any report I send from a company computer generates a server log that shows every website that my computer connects with, and won't this log identify me as a report originator?**

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer to EthicsPoint is available. In fact, EthicsPoint is contractually committed to not pursue a reporter's identity.

If you feel uncomfortable making a report on your work computer, you have the option of using a computer outside our work environment (such as one located at an Internet cafe, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

**Can I file a report from home and still remain anonymous?**

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is completely maintained. In addition, EthicsPoint is contractually committed not to pursue a reporter's identity.

**I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?**

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you-as a reporting party-need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

**Is the telephone toll-free hotline confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Website. These reports have the same security and confidentiality measures applied to their during delivery.

**What If I want to be identified with my report?**

There is a section in the report for identifying yourself, if you wish.

## **Tips & Best Practices**

### **I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?**

Our company chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees.

### **What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?**

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

### **What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?**

When you file a report at the EthicsPoint Website or through the EthicsPoint Call Center, you receive a unique username and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

### **Are these follow-ups on reports as secure as the first one?**

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

### **Can I still file a report if I don't have access to the Internet?**

You can file an EthicsPoint report from any computer that can access the Internet. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.