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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool that enables management and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive, ethical work environment. EthicsPoint is not a part of Warner Media or its parent company, AT&T Inc. It is a third-party hired by Warner Media to assist in the reporting of possible workplace misconduct.

Why do we need a system like EthicsPoint?

- We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive, ethical work environment and maximize productivity.
- Publicly traded companies in the United States are required by law to have an anonymous reporting system.
- An effective reporting system helps 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 report over the Internet or by telephone.

What type of situations can I report?

The EthicsPoint system allows those within the United States to report any instance of misconduct, including violations of the Standards of Business Conduct, Company policy, or any other concern you may have. Data privacy laws may limit the scope of reportable matters for those located outside of the United States.

If I see a violation, shouldn't I just report it to my supervisor or HR department and let them deal with it?

When you observe behavior that you believe violates our Standards of Business Conduct, or any other Company policy, we expect you to report it. If you think that an actual or possible violation has occurred, it's important to report your concerns immediately to your supervisor, the HR department, your division's Compliance Office or the Warner Media Ethics & Compliance Office. We recognize, however, that this isn't always possible and you may not be comfortable reporting issues in person. In those circumstances, we would rather you report to EthicsPoint than keep the information to yourself.

Why should I report what I know?

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

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our Company - both good and bad. You may have knowledge of conduct that may be cause for concern. Your reporting can minimize the potential negative impact on the Company and our people. Also, raising concerns may help identify issues that can improve corporate culture and performance.



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. Those receiving the reports are trained to keep the information confidential.

Are there other ways to report a concern or ask a question?

Yes. You may contact your supervisor, the HR department, or the Compliance Office directly. You can find the contact information for the Compliance Office in the Standards of Business Conduct or by clicking the “Contact the Compliance Office” tab on the EthicsPoint homepage.



Reporting – Security & Confidentiality

Can I file an anonymous report?

Yes, if you are calling from the United States and most other countries. Data privacy laws in some countries outside of the United States prohibit or limit anonymous reporting. If you are located in one of these countries, EthicsPoint will require you to provide identifying information. Regardless of where you are calling from, however, the Company encourages you to identify yourself, as it will greatly assist the Company's investigation. Whether you choose to identify yourself or not, all reports are kept confidential.

It is my understanding that any report I send from a Company computer generates a server log that shows every web-site that my PC 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 PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside your work environment (such as one located at an Internet café or at a friend's house) to file a report through the EthicsPoint secure website.

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 totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity. In certain countries outside the U.S., anonymous reports are not permitted. EthicsPoint will instruct you as to whether you can file an anonymous report.

I am concerned that the information I provide to 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 - should ensure that the body of the report does not accidentally reveal your identity (e.g., "From my cube next to Jan Smith..." or "In my 33 years..."). However, the more information you provide, the better able the Company is to investigate the situation. In certain countries outside the U.S., anonymous reports are not permitted. EthicsPoint will instruct you as to whether you can file an anonymous report.



Is the telephone toll-free hotline confidential and anonymous?

Yes, assuming of course you are in a country whose laws permit anonymous reporting. When using the hotline you will be asked to provide the same information that you would provide in an Internet-based report and an operator will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

We encourage you to identify yourself and there is a section in the report for you to do so, if you wish. Identifying yourself greatly helps the Company in its investigation. The Company will make every effort to protect your identity if you do so.



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 promotes ethical behavior. All unethical conduct, at any level, hurts the Company and its employees, including you. A seemingly harmless lapse in ethics can have disastrous effects on an otherwise healthy company. So, if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

I am not sure if what I have observed or heard is a violation of Company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

When in doubt, file a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure. The Company welcomes all good faith reports, even if the investigation reveals that no violation has occurred.

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

No. 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, either online or over the telephone, you will receive a unique username and create a password. With your username and password, you can return to the EthicsPoint system (either online or over the telephone) and access your original report to add more detail or answer questions posed by a Company representative, if the Company has questions. We strongly suggest that you return to the site in the time specified to answer any Company questions. You and the Company now have entered into an "anonymous dialogue" that can greatly aid the Company in resolving the situation.

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

Yes. All follow-up communications with EthicsPoint are held in the same strict confidence as the initial report.