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## **About the Netflix confidential reporting hotline through EthicsPoint**

### **What is EthicsPoint?**

EthicsPoint is a confidential reporting tool created by NAVEX Global to assist management and employees to work together in addressing potential fraud, accounting abuse, and violations of our Code of Ethics.

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

Publicly traded companies are required by U.S. law to have a reporting system that permits anonymous reporting to address accounting and auditing fraud directly to the audit committee.

## **Reporting – General**

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

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

### **What type of situations should I report?**

The intention is to use the EthicsPoint system to report any possible fraud, accounting abuse, or violation of our Code of Ethics.

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

When you observe behavior that you believe could be fraud, accounting abuse, or may violate our Code of Ethics, ideally, we encourage you to bring your concerns forward to your direct manager or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in that manner. We have partnered with EthicsPoint to provide you the ability of reporting the matter confidentially through EthicsPoint, and, if you desire, on an anonymous basis.

### **How does the reporting flow go?**

First be sure to thoroughly complete a report via the Internet or with an intake specialist by telephone:

1. Specify what kind of report you'd like to make from the available choices.
2. Please read or listen to the anonymity information very carefully. It helps ensure that you do not compromise your identity during the reporting process.
3. You will now complete the report, providing information about the incident, including:
  - a. Who: persons engaged in the incident, including titles;
  - b. What: what specifically occurred;
  - c. Where: the location of the incident; and
  - d. When: the time and duration of the incident.
4. Next, you will be asked to create a password. The EthicsPoint system will generate an identification code called a "Report Key." **Write them both down and keep them in a safe place.** You will need them to follow-up later, or if you ever want to review or amend your report.

Allow up to five business days after you complete your report and then please return to the EthicsPoint system to see if the company has any follow-up questions or requests.

1. Reconnect with the EthicsPoint system either via the Internet or by telephone.
2. This time, click on (or ask to perform) "Follow-up an existing report."
3. Provide your Report Key and Password.
4. You can now elect to review report details, respond to questions, and add information.
  - a. To review your report, just click "Review Report Details" or ask the intake specialist.
  - b. You will be told if your company has entered questions about your report. Answer the questions verbally or by typing in the question boxes and click "Submit."
  - c. You can add information to the report verbally or by using the "Submit New Information" box.
5. You may return regularly to review your report, answer questions, and add information.

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

Reports are entered directly on the local EthicsPoint secure server to limit access to these reports. 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, location of the incident, and in compliance with applicable local data privacy laws. Each of these report recipients has had training in keeping these reports in the utmost confidence.

#### **Reporting Security & Confidentiality**

### **Do I have to make the report anonymously? What if I want to be identified with my report?**

There is no requirement that a report be made on an anonymous basis. You have the option of reporting anonymously, but can also identify yourself, if you wish. We won't retaliate against anyone for bringing a good faith concern to our attention.

### **It is my understanding that any report I send from a Company computer generates a server log that shows every web-site that my computer connects with, and won't this log identify me as a report originator if I choose to make my report on an anonymous basis?**

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer to EthicsPoint is available.

If you feel uncomfortable making a report on your work computer, you have the option of using a non-work related computer through the EthicsPoint secure website.

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

A report from your home computer, a friend's computer, or any Internet portal will remain secure and confidential.

### **Is the telephone toll-free hotline confidential 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 Web site. These reports have the same security and confidentiality measures applied to them during delivery.

## **Privacy**

When you file a report we may collect your name, last name, telephone number and/or job title if you choose to provide this information. In addition, we collect the information that you submit as part of your report. Your personal information will be used in accordance with applicable law, including data protection law. For Netflix employees, please refer to our notices located in our Practices and Policies.

Personal information provided in a report may be transferred outside of the United Kingdom, the European Union, and/or the European Economic Area for the purpose of providing interpretations or administration of this service. Your information - and the information of the person or entity you are reporting about - will only be used in order to investigate a report. Once the information is no longer needed for that purpose, it will be destroyed accordingly. In some countries, anonymous reporting may not be permitted.

## **Tips & Best Practices**

**I am not sure if what I have observed or heard is fraud, accounting abuse, or a violation of the Code of Ethics. What should I do?**

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a possible violation that turns out to be harmless than let possible harmful violations go unchecked because you weren't sure.

**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 Web site or through the EthicsPoint Call Center, you receive a unique identification code called a "Report Key" 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 additional questions that may help resolve open issues. Once a report is filed, we encourage you to return to the site in the time specified to answer additional questions Netflix may have.

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

Yes. All EthicsPoint correspondences are held in the same strict confidence as the initial report.