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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool to assist management and employees in working together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- We believe that our employees are one of our most important assets. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud.
- An effective reporting system will augment our efforts to foster a culture of high ethical work standards and integrity.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability, to the extent permitted by applicable law, to file a confidential, anonymous report via either the telephone or the Internet.

What type of situations should I report?

The EthicsPoint system is designed for employees to report, to the extent permitted by applicable law, violations of our Code of Conduct or complaints and concerns regarding certain accounting, internal controls or auditing materials.

If I see a violation, shouldn't I just report it to my supervisor or human resources?

If you observe behavior that you believe violates our Code of Conduct or have concerns regarding certain accounting, internal controls or other related matters, we expect you to report it. Ideally, you should bring any concerns to your direct supervisor, or member of our



management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. For such circumstances, we have partnered with EthicsPoint to provide a confidential mechanism for reporting violations or concerns.

Why should I report what I know?

All employees have the right to a positive work environment and have a responsibility to understand and comply with the Code of Conduct, applicable government regulations, and Carlyle policies. As a Carlyle employee, you also have the right and responsibility to raise compliance and ethics concerns through our established channels.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on Carlyle and its employees.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. EthicsPoint makes these reports available only to specific individuals within Carlyle who are charged with evaluating the report based on the type of violation and location of the incident.

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

The EthicsPoint system allows us to assure an ethical workplace. We have carefully chosen this 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 Carlyle computer generates a server log that shows every website that my computer connects with. 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 not to 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 café, 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 remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous to the extent permitted by applicable law. An Internet portal never identifies a



visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is maintained. EthicsPoint also is contractually committed not to pursue a reporter's identity.

Is the telephone toll-free hot line 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 web site. These reports have the same security and confidentiality measures applied to them as reports submitted directly on the EthicsPoint website.

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?

All perceived unethical conduct, at any level, ultimately hurts Carlyle and its employees. If you know of any incident of misconduct or ethical violation, it is your responsibility to report it.

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

Please file a report. We would rather have you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

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

Yes. If you don't have access to or are uncomfortable using a computer, you can call the applicable EthicsPoint hotline number, which is available 24 hours a day, 365 days a year.