

Frequently Asked Questions

What is the AES Helpline?

The AES Helpline is a confidential resource for AES people, contractors, business partners and others to ask questions or report concerns regarding AES business conduct.

Who operates the AES Helpline?

In order to ensure confidentiality, the AES Helpline is administered by an independent third party provider, EthicsPoint.

How can I contact the AES Helpline?

The AES Helpline is available worldwide 24 hours a day and 7 days a week. AES people, contractors, business partners and others may use the AES Helpline website (www.aeshelpline.com) or make a free telephone call using the access numbers contained in the AES Helpline website and on AES Helpline posters displayed at AES business locations.

Why do we need the AES Helpline?

We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity. An effective reporting system supports our other efforts to foster a culture of integrity and ethical decision-making.

When should I use the AES Helpline?

At AES, we strive to create a work environment where AES people feel free to raise questions or concerns to AES leaders or through direct business channels.

However, we recognize that in some cases AES people may not feel comfortable doing this. Accordingly, Compliance officials and the AES

Helpline offer alternative options for AES people, contractors, business partners and others to request advice or report suspected wrongdoing.

What type of situations should I report?

The AES Helpline may be used to ask questions or to report any violation of our Values or other concern you may have. However, because of local law, reports related to conduct in the European Union are limited to bribery, auditing and accounting, banking, or financial issues and other matters should be addressed to a business leader or the local Compliance Officer.

Do I have to provide proof of the suspected wrongdoing in my report?

No, although you can attach information to your report through the AES Helpline website. It will make our investigation more efficient and effective if you have documents, images, or other files that you can provide to the investigation team. A clear statement with details of what you think may be wrong is also important. We take your allegations seriously, but we can only take remedial action with clear, verifiable information.

How does the AES Helpline website work?

When you log on to www.aeshelpline.com you will see three options:

- Report a concern;
- Ask a question; or
- Follow up on a prior report.

The first option is used to report suspected wrongdoing, the second is used to submit a question to Compliance personnel, and the third is to follow up on a report you previously made

Frequently Asked Questions

using an identification number ('report key') and password that you created.

If you select to report a concern or ask a question, you will be asked to choose the country in which you are located, the country and AES business location in which the issue arose, and the type of issue that you are reporting or asking a question about. You will also be asked to describe the incident or the question in as much detail as possible. When you complete your report, you will be given your report key to write down and will be asked to create a personal password. Keep this information to follow up on your report.

[How does the AES Helpline telephone number work?](#)

When you call your local AES Helpline telephone number, a professionally trained EthicsPoint telephone operator will ask you if you want to report a concern, ask a question, or follow up on a prior report. The operator will guide you through a series of questions to identify the relevant details of your concern or question. When your report is complete, the EthicsPoint operator will summarize the information you have provided and make any changes necessary to ensure that you are satisfied with the accuracy of your concern or question. You will also be given an identification number ('report key') and a password. Keep this information to follow up on your report by telephone or through the AES Helpline website.

[Do I need to speak English to use the AES Helpline?](#)

No. The AES Helpline website (www.aeshelpline.com) is available in several AES languages and allows you to enter information in any language. If you prefer to call the AES Helpline, you can request an interpreter to assist the operator in taking your report.

[Is there a difference between filing a report through the AES Helpline website or by telephone?](#)

No. When filing a report by phone you will be asked to provide the same information that you would provide in an Internet-based report. Reports filed by phone have the same security and confidentiality measures applied to them.

[What happens to my AES Helpline report after it is made?](#)

The independent third party provider that administers the AES Helpline, sends all telephone and website reports to the AES Ethics and Compliance Department in Arlington, Virginia. The AES Ethics and Compliance Department responds to all requests for advice and investigates all reports of improper behavior with support of local and regional compliance personnel, as required. In some cases, the AES Ethics and Compliance Department requires assistance from local AES personnel who have unique expertise or information. When local AES personnel provide assistance, all efforts are made to protect the confidentiality of the AES Helpline report and information therein.

[How long does it take for my question to be answered or concern resolved?](#)

We try to respond to all reports in a timely manner. The time it takes to resolve a matter varies, however, because some reports are more complex than others and verifiable information may be easier or harder to find. You can help make this process efficient and effective, however, by providing a clear statement of your concern or question, providing copies of relevant documents, and identifying relevant witnesses.

Frequently Asked Questions

What if I remember something important after I file my report?

If you forgot an important piece of information when you filed your report, please supplement your report as soon as possible by calling or logging on to the AES Helpline to “Follow up on a prior report.” Use your identification number (‘report key’) and password to access your report and add the relevant information or documents.

What if there are questions for me concerning my report?

The AES Helpline allows us to communicate with you to ask any questions we may have. If you chose to make your report anonymously, we will post any questions through the AES Helpline – what you need to do is check back on your report from time to time using your report key and password to find out if we have asked a question. If you prefer to receive an alert when we post an update or question to your report, you may provide an email address through which the AES Helpline can send a notice. This email may be one you use every day, or one you have created for this purpose. If you provide a phone number or email address where we can contact you, we may use those to ask you questions.

What do I do if I lose my report key or password?

A high level of confidentiality is maintained for all concerns and questions reported to the AES Helpline. Therefore, if you lose your identification number (‘report key’) or password, you will need to file a new report. You should mention that the new report relates to a prior report for which you lost your report key or password. If you still have your report key but not your password, you can provide your report key in your new report so we can link your two reports.

Do all reports result in some kind of action?

We respond to all questions and investigate all concerns reported to the AES Helpline. We work with the relevant AES businesses to implement preventative or remedial actions identified while investigating reported concerns. Not all reports result in preventative or remedial action as not all reports identify a verifiable or material issue.

What happens if the investigation conducted does not find proof of the suspected wrongdoing?

It is possible that the investigation of your report does not find sufficient proof of the suspected wrongdoing, in which case we will close the case as “unsubstantiated.” We do not discipline AES people or terminate business relationships based on allegations alone.

What happens if the investigation conducted finds proof of the suspected wrongdoing?

If the investigation finds sufficient proof of the suspected wrongdoing, we will work with the relevant AES businesses to take remedial actions, including disciplinary measures, as appropriate. Any discipline, up to and including termination of employment contracts, will be determined in consultation with management, Human Resources, and the Legal Department, as appropriate, and consistent with relevant labor laws and agreements.

Are managers and technical personnel investigated and disciplined the same?

All reports are taken seriously and investigated. AES believes that the tone set by our leadership is an essential part of creating a strong, ethical workplace. Each investigation and the remedial

Frequently Asked Questions

action supported by its findings is unique, and we take action based on verifiable information and business needs. Ethics and Compliance personnel remain involved in defining remedial action to assist the business in taking consistent and appropriate remedial measures.

Who can access my report?

All reports submitted to the AES Helpline can be reviewed by the investigation team in the AES Ethics and Compliance Department in Arlington, unless one of those team members is named in the report, in which case another appropriate person will be identified to conduct the investigation. The investigation team in Arlington may engage local and regional compliance personnel to assist in the investigation, in which case those people may also be able to review the report.

Will the details of my report be shared with the individuals named in the report?

Your actual report will not be shared with the individuals named in the report. However, it is important to fairly investigate a concern and allow named individuals a chance to respond to concerns and share their perspectives. We will take all reasonable steps to protect your identity when discussing the issues raised by the report with the named individuals.

Will my manager know if I use the AES Helpline?

No. Your manager will not receive a copy of your report nor will your manager receive a notification that you submitted a report. If it is necessary to consult your manager during an investigation, either for relevant information or to allow him or her an opportunity to respond as a named individual, we will take all reasonable steps to protect your identity when discussing the issues raised by the report. If your

report is made anonymously, not even Ethics and Compliance personnel in Arlington have information about your identity.

Do I have to provide my name when I contact the AES Helpline?

No, you do not have to provide your name and you may make an AES Helpline report anonymously. Within the European Union, callers are encouraged but not required to identify themselves.

If I remain anonymous, how will I receive information on the status of my report and be contacted for follow up?

When you make a report to the AES Helpline you will be given an identification number ('report key') and password. You can check the status of your report by telephone or through the website and leave or receive messages for the investigation team. You may also choose to create an email address before filing your report for the purpose of anonymously communicating with investigators.

Does the AES Helpline record my telephone call, telephone number or IP address?

No. The third party service provider for the AES Helpline, EthicsPoint, does not record calls or generate or maintain any internal connection logs with IP addresses or telephone numbers, so no information linking your computer or telephone to your report will be available to AES.

Is the AES Helpline secure?

Yes, reports are entered directly on the third party's secure server to prevent any possible breach in security. Only the AES Ethics and Compliance Department in Arlington and local

Frequently Asked Questions

Ethics and Compliance personnel, as required, have access to these reports. No other AES people can access the report.

Can I be retaliated against for raising concerns or reporting improper behavior to the AES Helpline?

AES has a zero-retaliation policy and will not tolerate retaliation against any AES person for raising questions, making a good faith report of suspected wrongdoing, or responding to questions in an investigation. When AES people contact the AES Helpline with questions or concerns they are doing the right thing. This does not mean that we can prevent all incidents of retaliation from happening, but if we are alerted to acts of retaliation, we will take steps to stop and prevent future retaliatory acts, and take any warranted disciplinary action.

Can I get in trouble for filing a report to the AES Helpline?

No. You will not be disciplined for asking a question or making a good faith report of suspected wrongdoing. However, if you make a false report to prejudice another person, company, or stakeholder, AES may choose to take appropriate remedial actions against you.

What happens if someone reports me to the AES Helpline?

If there is a material report made to the AES Helpline in which you are named, you will be informed of the relevant details of the report so you have a fair opportunity to respond to the concerns in the report. This does not mean that you will be told who filed the report – unless that fact is essential to your fair response – nor does it mean you should try to determine who filed the report. Such conduct could be seen as retaliatory in nature.