

## **ETHICS AND COMPLIANCE HELPLINE PROCEDURES**

Delta maintains the Safety, Ethics and Compliance HelpLine (“HelpLine”) to receive questions and concerns of a suspicion of wrongdoing. A suspicion of wrongdoing exists if an employee has reasonable grounds to suspect a violation of legal compliance, has ethics complaints or suspects violations of The Way We Fly.

The HelpLine report intake is managed by an independent company. Employees can call the HelpLine through toll-free access twenty-four hours a day, seven days a week, and foreign language capabilities. Employees can also write reports into [www.DeltaHelpLine.com](http://www.DeltaHelpLine.com) or, at the request of the employee, report in person.

A HelpLine reporter may remain anonymous as allowed by law. The HelpLine vendor collects details of the reported activity, the location, individuals involved, and witnesses and immediately sends the information to Delta. The Ethics and Compliance team in the Law Department works with the Employee Relations Center of Expertise (“ER COE”) to review each new case for assignment to the appropriate investigator and to assign a category based upon the seriousness.

Each reporter receives, at the time of filing the report, a reference number to use for followup or further communication with Delta. Within seven days, the reporter receives information about the review of the report and, if possible, the follow-up of the report within three months after receiving the reference number. Delta is committed to safeguarding the confidentiality of individuals who submit reports, where feasible and handling reports promptly and discreetly.

At the conclusion of an investigation, a final response is posted notifying the caller that the Investigation has concluded. Retaliation is prohibited.