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## About AlertLine

### What is AlertLine and who operates it?

AlertLine is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees in working together to address claims of fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

NAVEX Global is an independent external organization that provides hotline reporting solutions for organizations worldwide. NAVEX Global collects information from the reporter and then passes the report to Crown Castle for follow-up and investigation. You can find out more about NAVEX Global at <http://www.navexglobal.com>.

### Why do we need a system like AlertLine?

- 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.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

### Who can I contact if I have questions about AlertLine?

Tom Keaton (Director of Internal Audit)  
Phone: 724-416-2297  
Email: [tom.keaton@crowncastle.com](mailto:tom.keaton@crowncastle.com)

# Reporting – General

## Who can contact AlertLine?

Anyone can contact AlertLine. Whether you are a full/part-time employee, temp/contractor, or a client or vendor, you can contact AlertLine either via telephone (1-866-480-6138) or online at <http://www.crowncastle.alertline.com>. AlertLine is available 24 hours a day, 7 days a week, 365 days a year.

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

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

## What type of situations should I report?

The AlertLine system is designed for employees to report any violation of our Business Practices and Ethics Policy, our Harassment Free Workokace Poilcy, any other concern you may have.

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

When you observe some behavior that you believe violates our Business Practices and Ethics Policy, is unethical, or concerning, we expect you to report it. Ideally, you should bring any 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 this manner. It is for such circumstances that we have partnered with AlertLine. We would rather you report anonymously than keep the information to yourself.

## Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

## 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 initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people.

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

Reports are entered directly on the AlertLine secure server to prevent any possible breach in security. AlertLine makes these reports available only to specific individuals (SVP - General Counsel, SVP Business Support, VP Internal Audit, VP Litigation, and Director of Internal Audit) within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

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

The AlertLine system is designed to be a positive aspect of our overall philosophy, and to allow us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

### **When will I receive a response to my report?**

Our goal is to provide at least an initial response within two business days of receiving the report. However, follow-up may often require a more detailed and thorough investigation that may take longer to complete. You will be advised if this is the case in the initial response. Due to the confidential nature of any investigation, findings and any action taken based on the findings must remain confidential and cannot be shared.

### **How will I know what happens as a result of my report?**

When you make a report via the AlertLine website or the telephone hotline, you can check back periodically for an update on the status of the investigation either by accessing the AlertLine website or by placing a follow-up call via the telephone hotline. It is imperative that you check back with the system because we do not have a way to contact you directly unless you have previously provided your contact information.

Depending on the complexity of the case, at this stage, you may be advised that: the report is still being considered; an investigation has been completed and what, if any, action is being taken; or that more details about the case are needed for further investigation. However, for confidentiality reasons, you will not necessarily be told the specifics of how a particular matter is being/has been resolved. If you chose to give your name and contact information, you may be contacted by appropriate Crown Castle personnel as necessary.

## Reporting Security & Confidentiality

**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?**

AlertLine does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to AlertLine is available. In fact, AlertLine 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 our work environment (such as one located at an Internet café, at a friend's house, or at library.) through the AlertLine secure website. Many people choose this option, as AlertLine's data shows that fewer than 12% of reports are generated during business hours. Additionally, you have the option of reporting your concern over the telephone through our hotline at 1-866-480-6138.

**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 AlertLine system strips away Internet addresses so that anonymity is totally maintained. Plus, AlertLine is contractually committed not to pursue a reporter's identity.

**I am concerned that the information I provide AlertLine will ultimately reveal my identity. How can you assure me that will not happen?**

The AlertLine system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

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

If reporting through the hotline, please ensure that you remain on the line until the operator is able to provide you with a username and you have created a password as these are required to access your claim in the future. Without this information, you will **not** be able to access your claim after the call terminates.

**What if I want to be identified with my report?**

There is a section in the report where you can identify yourself, if you wish. Should you choose to self-identify, please be assured that your claim and identity will remain confidential and anonymous to the extent possible.

**If I call AlertLine, will my call be recorded?**

No. However, in order to create a report, hotline staff will take notes from your call.

**What happens if a person due to receive a report is the subject of the concern?**

The AlertLine system checks any name reported with the names of those in the report distribution and flags any possible conflicts. Where this occurs, the person named in the report will be removed from the recipient list for the specific report and the other members of the distribution will receive the report for analysis and action.

## **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 chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have 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?**

File a report. AlertLine 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.

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

The AlertLine 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 AlertLine Web site or through the AlertLine Call Center, you receive a unique user name and are asked to choose a password. You can return to the AlertLine system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site regularly to answer company questions. You and the company now have entered into an “anonymous dialogue,” where situations are not only identified, but can also be resolved, no matter how complex.

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

All AlertLine correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

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

You can file an AlertLine report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the AlertLine toll-free hotline (1-866-480-6138), which is available 24 hours a day, 365 days a year.