

NAVEX GLOBAL™
The Ethics and Compliance Experts

Common Questions & Answers for Employees



ABOUT NAVEX Global

What is NAVEX Global?

NAVEX Global is a comprehensive and confidential reporting tool to assist management and employees to work 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 NAVEX Global?

- We believe that our employees are our most important asset. By creating open channels of communication, we can promote a professional and 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.

REPORTING – GENERAL

How can I ask questions or report concerns to Verizon Ethics?

You have the ability to reach out via telephone, website, or email.

What type of situations should I raise to Verizon Ethics?

V Teamers can ask any questions related to the Code of Conduct and report any misconduct, ethics concerns or violations of the Code of Conduct, or another 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?

Reporting misconduct or ethics concerns isn't just an option – it's each employee's responsibility. Ideally, you should bring any concerns forward to your direct manager or another 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 we have partnered with NAVEX Global. We would rather you report anonymously (where permitted by local laws) than keep the information to yourself.

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

We're all expected to help maintain and promote our culture of integrity. A critical part of maintaining a culture of integrity is making sure that each of us asks questions and raises concerns. Integrity is a core value. We all have a responsibility to act with the highest ethical standards and hold others accountable to them. All V Teamers contribute to building our brand and reputation. Each of us is responsible for protecting those assets and keeping them strong as we conduct business every day.

Does management really want me to report?

Under the Code of Conduct, all of us are responsible for reporting misconduct. Unless V Teamers identify and report potential problems, we may not know if something improper is going on. It's not always easy to speak up, but we need you to do so. So if you see something, please say something.

Where do these reports go? Who can access them?

Reports are entered directly to a NAVEX Global secure server to prevent any possible breach in security. NAVEX Global makes these reports available only to specific individuals within Verizon who are charged with evaluating the report, based on the type of matter raised 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 NAVEX Global system concentrates on being a positive aspect of our overall philosophy and allows us to ensure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

REPORTING SECURITY & CONFIDENTIALITY

It is my understanding that any report I send from a company computer generates a server log that shows every website my PC connects with; won't this log identify me as a report originator?

NAVEX Global does not generate or maintain any internal connection logs with IP addresses; no information linking your PC to NAVEX Global is available. In fact, NAVEX Global 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, the library, at a friend's house, etc.) through the NAVEX Global secure website. Many people choose this option, as NAVEX Global's data shows that fewer than 12% of reports generated during business hours.

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, where permitted by local laws. An Internet portal never identifies a visitor by screen name and the NAVEX Global system strips away identifying information, such as an IP address, so that anonymity is maintained. Plus, NAVEX Global is contractually committed not to pursue a reporter's identity.

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

The NAVEX Global system is designed to protect you. In fact, we are contractually committed not to pursue a reporter's identity. To further ensure your anonymity, you - as a reporting party - need to be careful not reveal any identifying details as part of your report. For example, "from my cube next to Jan Smith ..." or "in my 33 years ..."

Is the phone number confidential and anonymous too?

Yes – so long as anonymous reporting is permitted by local laws. You will be asked to provide the same information you would provide in an Internet-based report; the interviewer will type your responses directly into NAVEX Global's secure environment. Hotline-based reports have the same security and confidentiality measures applied to them during delivery as Internet-based reports.

What if I want to be identified with my report?

There is a section in the report where you may identify yourself. Providing your contact information will allow for the appropriate group reviewing and addressing your report to directly respond to you.

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?

Under Verizon's Code of Conduct, all of us are responsible for reporting misconduct. If you see something, you have a responsibility to say something. If you see behavior that is inappropriate, let someone know. That's how we live our Credo and Core Values — by our actions. All unethical conduct, at any level, ultimately hurts the company — our brand and reputation. Consider what happened in recent corporate scandals as a result of a compliance failure in which individual bad decisions and misconduct were allowed to grow and threaten the entire company. As a result, they're now facing massive fines, penalties, and lost market value, as well as lasting damage to their reputations. We need everyone's participation and help, so contact us for guidance on ethical matters or to alert us about questionable conduct.

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?

Contact Verizon Ethics. All inquiries and complaints are kept confidential. You can also contact the Compliance and Legal teams, Security, HR, Internal Audit, or your supervisor to seek guidance on any questionable behavior. NAVEX Global can help you prepare and file your report so it can be properly understood. We would rather you report a situation that turns out to be harmless than let possibly unethical behavior go unchecked because you were unsure.

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

The NAVEX Global system and report distribution protocols are designed so implicated parties are not notified about or granted access to reports in which they have been named. Verizon Ethics is the initial recipient of all contacts. We take great care in reviewing each and every matter and ensuring that the appropriate individuals are engaged to objectively review and address the matters as needed. Employee reporting goes to the heart of our ability to run an effective compliance program. Everyone needs to be comfortable speaking up and raising issues.

What if I remember something important about the incident after I file the report?

When you file a report, either using the Internet or through NAVEX Global's Contact Center, you receive a unique report key and are asked to select a password. With the report key and your password, you can return to the NAVEX Global system again, either by Internet or telephone, and access the original report. At that point, you can add more details.

What if you have questions for me concerning my report?

NAVEX Global provides functionality that enables company representatives to post questions for you, even if you report anonymously. When you receive your report key, you will be provided with the amount of time we expect for the report to be processed. When that time has passed, we strongly encourage you to check to see if any questions have been posted. Providing the opportunity for such dialogue means situations may not only be identified but can also be resolved, no matter how complex.

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

All NAVEX Global correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity, if you so choose (and where permitted by local laws).

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

You can file a NAVEX Global report from any computer that can access the Internet. You can file from home. Many public locations, including most public libraries, have internet access. If you don't have access or are uncomfortable using a computer, you can call the NAVEX Global toll-free hotline which is available 24 hours a day, 365 days a year. Dialing instructions vary by country; verify the proper dialing instructions with a local team member.

What should I do if the telephone number is not working?

If the telephone number listed above is not functioning, please make your report online through this web site or email Verizon Ethics (ethics@verizon.com). Please indicate in the report that the telephone number did not work.

What should I do if the country I am in is not listed above?

If there is no service for your location, please make your report online through this web site or email Verizon Ethics (ethics@verizon.com). Please indicate in the report that dialing instructions for the country you are located in were not available.