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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX that enables NTTA management, employees and others to work together to address matters impacting our organization while cultivating a positive environment for all.

Why do we need a system like EthicsPoint?

- Our people are our most important asset. By creating open channels of communication, we promote a positive environment and maximize productivity.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the internet or the telephone?

Yes. EthicsPoint enables you to file a confidential, anonymous report via either the telephone or online. You can also report via U.S. mail to NTTA's Ethics Officer (or another executive) at 5900 W. Plano Parkway, Suite 100, Plano, Texas 75093.

What types of situations should I report?

The EthicsPoint system allows employees and others to report any violation of our ethics policies or laws or other ethics-related concerns you may have.

If I see a violation, shouldn't I just report it internally and let them deal with it?

When you observe behavior that you believe violates our ethics policies, we expect you to report it. NTTA encourages open communication, feedback, and discussions about any matter that could impact the organization. We believe that most concerns can be resolved in the applicable chain of command in an atmosphere of mutual respect. 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 NAVEX. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know?

Violations can impact NTTA's reputation and mission. By working together, we can maintain a healthy and productive environment.

Does NTTA really want me to report?

Yes! 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 NTTA, our people, our customers, and our region.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. NAVEX makes these reports available only to specific individuals within the company who are charged with investigating the report, based on the type of violation and location of the incident. To the extent possible, these report recipients will keep these reports in the utmost confidence.

Reporting Security & Confidentiality

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

NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

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 home or a third party) through the EthicsPoint secure website. Many people choose this option, as NAVEX data shows that fewer than 12% of reports are generated during business hours.

C I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any online portal will remain secure and anonymous. An online portal never identifies a visitor by screen name and the EthicsPoint system strips away internet addresses so that anonymity is completely maintained.

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

The EthicsPoint system protects your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure 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 phone hotline confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an online-based report and an interviewer will type your responses into the EthicsPoint website. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report to identify yourself, if you wish.

What can I do in EthicsPoint and still remain anonymous?

You can do the following anonymously in EthicsPoint:

- File a report
- Follow-up on the status of your report
- Respond to questions
- Provide additional information and documentation

Tips & Best Practices

I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?

NTTA promotes ethical behavior. All unethical conduct, at any level, ultimately hurts NTTA and its people, including you. If you know of any incidents of misconduct or ethical violations, 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. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

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

The EthicsPoint system and report distribution ensure 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 concerning my report?

When you file a report at the EthicsPoint website or through the EthicsPoint call center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the EthicsPoint system again either online or phone and access the original report to add more detail or answer questions posed by a company representative.

Will I be notified if more information is needed or if there are questions about my report?

Because the process is based on confidentiality and anonymity, we encourage employees who submit a report to write down and keep the "Report Key" provided as part of submitting a report. You will receive a Report Key whether your report was filed via phone or online. Use the Report Key to return to the report within 5-6 business days to see if NTTA management has posted any questions or requires additional information. This process will be used to communicate the status of the report and any potential correspondence during the investigation.

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

All EthicsPoint correspondences are held in the same strict confidence as the initial report.

What if I lose my Report Key or forget the password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

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

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

EthicsPoint

Report ethics-related concerns anytime anonymously and confidentially.

214-224-2488 • ntta.ethicspoint.com • nttamobile.ethicspoint.com