

INTEGRITY HELPLINE

FREQUENTLY ASKED QUESTIONS

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WHAT IS ETHICSPPOINT?

EthicsPoint is a comprehensive and confidential reporting tool operated by an independent third-party company to assist our workforce in reporting fraud, abuse, or misconduct. EthicsPoint provides this service to many Fortune 500 companies.

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WHAT IS THE INTEGRITY HELPLINE?

The Integrity Helpline is a user-friendly telephone and web-based resource that our work force, business partners, vendors and others can use to ask questions or report actual or potential violations of the law, the Code of Business Conduct and Ethics or corporate policies. The Integrity Helpline is operated by EthicsPoint, an independent third-party that provides Helpline services to many global companies.

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HOW DO I CONTACT THE INTEGRITY HELPLINE?

People can ask a question or make a report on the Integrity Helpline by filling out an online form or by making a toll-free telephone call seven days a week, twenty-four hours a day, from any location, in multiple languages. The toll-free telephone numbers for your country are located on this website. The online form can be found at <http://paypal.ethicspoint.com>. You do not need a company-issued computer or company email address to use this website.

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WHEN SHOULD I CONTACT THE INTEGRITY HELPLINE?

You should contact the Integrity Helpline if you have any questions or concerns about potential violations of the law, our Code of Business Conduct and Ethics, and other corporate policies.

Please note there are restrictions on the types of categories that can be reported through the Integrity Helpline by employees in the European Union. Employees based in the European Union ("EU") may not use the Integrity Helpline for reporting matters that fall under the "human resources" category, including issues relating to Employee-manager relations, personnel issues, compensation, favoritism, benefits, or job performance. Employees based in the EU who make such reports to the Integrity Helpline will be notified that the Ombuds/Ethics Team will log the concern on the Employees' behalf with Employee Central and that the case will be closed and removed from the Integrity Helpline system to avoid unnecessary retention of personal data. For Employees based in non-EU locations who file HR-related matters, the Ombuds/Ethics Team will refer such reports to Employee Central for investigation.

If the Integrity Helpline cannot accept a question or report about your concern, the company encourages you to talk with your manager or a higher-level manager in your reporting line, log your concern on Employee Central, contact your HR representative or contact a Business Ethics Officer.

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WHY SHOULD I REPORT WHAT I KNOW? WHAT'S IN IT FOR ME?

All our actions collectively determine our company's success. We are all empowered to speak up if we observe harmful practices or we are being harmed by the actions of a PayPal employee. By reporting your concerns, you help build a company where integrity matters in everything we do.

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HOW DOES THE INTEGRITY HELPLINE WORK?

If you make a report on the Integrity Helpline by telephone, an EthicsPoint operator will ask you some questions to gather as much information as possible. You can also log into the website and fill out an online form which is available in multiple languages. If the form is not available in your language, call the toll-free number and interpreters who speak over 100 languages will be able to help you.

The information you provide will be sent to the company's Ombuds/ Ethics team for an initial assessment and will then be assigned to an authorized investigator depending on the nature of the report.

When submitting your question or report on the Integrity Helpline, you will create a password and be given a unique report number (report key). We encourage you to follow-up and check the status of your question or report regularly by simply calling back or logging onto the website with your password and report key. The Ombuds/Ethics team may post a request for more information that may help with the investigation into your report.

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WHAT SHOULD I DO IF I LOSE MY REPORT KEY OR PASSWORD USED FOR SUBMITTING A REPORT?

Because of the high level of security maintained for these reports, if you lose your report key or password, you will need to fill out a new report. You should mention in the new report that it is related to a report you previously submitted.

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SHOULD I SUBMIT A REPORT ON THE HELPLINE IF I JUST NEED TO ASK A QUESTION?

When in doubt, it's always best to ask your question. Use the "Inquiry" issue category to record your question or request a call with a representative of the Ombuds/Ethics team. Aside from the use of the Integrity Help Line, employees and contingent workers may direct questions to management, Employee Central, send an email to speakup@paypal.com or a Business Ethics Officer.

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WHAT ARE THE DIFFERENT WAYS TO MAKE A REPORT OF A VIOLATION?

The company encourages the active detection and prevention of misconduct. If you have reason to believe any employee or party acting on behalf of the company – including your manager or any member of senior management – has violated, may violate, or is acting in a manner that appears to violate our Code of Business Conduct & Ethics, the law or corporate policies, you are expected to immediately report such activity to at least one of the following resources:

- Report it to the Integrity Helpline by web-form or phone
- Open a case with Employee Central or speak to your HR business partner
- Report it to your manager
- Contact a member of the Ombuds/ Ethics team at speakup@paypal.com
- Reach out to your Business Ethics Officer. Find a roster of BEOs at <http://beo>.

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WHAT IS A BUSINESS ETHICS OFFICER (BEO) AND HOW CAN THEY HELP ME?

Business Ethics Officers (BEOs) are a group of trusted advisors who are available to help guide employees through business conduct and ethics questions. A BEO can be found by typing BEO into your Internet Explorers browser's address bar or the Bridge when you are logged into the corporate network. You can also click the "Ask a Business Ethics Officer" button on the main page of this web portal it will redirect you to the internal BEO site, where you can submit your question or disclosure.

The following activities should be disclosed to a BEO to formally document the disclosure and to receive approval before proceeding:

- accepting outside employment;
- making an investment in an outside entity;
- accepting an offer to join an outside board or accept an advisory position;
- disclosing familial or personal relationships that may create a conflict of interest at work;
- offering or accepting gifts, entertainment or meals;
- offering or accepting travel or accommodations to/from an outside entity;
- making charitable contributions using corporate resources;
- pursuing a business opportunity available to the company as a personal business opportunity; and
- reporting any misconduct or other potential conflict of interest or business ethics matter.

Remember, it is always best to disclose a matter to the company. When in doubt, ask a BEO or email

speakup@paypal.com.

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IF I SEE A VIOLATION, SHOULDN'T I FIRST REPORT IT TO MY MANAGER?

If you prefer, you may initially report a violation or potential violation of the law, our Code of Business Conduct and Ethics, or other corporate policies to your manager or a higher-level manager in your reporting line.

If you are uncomfortable reporting it to management, if you do not know whom to contact, or if you believe your concern has not been satisfactorily addressed, please submit a report through the Integrity Helpline. With the Integrity Helpline, you can be sure your issue or question is routed to the proper people. And lastly, all report information is secure and is treated as confidential to the extent reasonably possible.

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IF I SEE A VIOLATION, CAN I JUST REPORT IT TO AN HR BUSINESS PARTNER OR EMPLOYEE CENTRAL?

Yes, you can report a violation to Employee Central by opening an Employee Central e ticket or you can report it directly to an HR business partner. If you feel uncomfortable doing so, please submit a report using the Integrity Helpline.

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WHAT TYPES OF ISSUES SHOULD BE REPORTED?

Any potential violation of our Code of Business Conduct & Ethics, corporate policies or the law should be reported. We discourage the misuse of the Integrity Helpline for frivolous reports and making reports via the Helpline in bad faith is prohibited at PayPal.

The use of the Integrity Helpline is limited in the European Union. Employees based in the European Union ("EU") may not use the Integrity Helpline for reporting matters that fall under the "human resources" category, including issues relating to Employee-manager relations, personnel issues, compensation, favoritism, benefits, or job performance. Employees based in the EU who make such reports to the Integrity Helpline will be notified that the Ombuds/Ethics Team will log the concern on the Employees' behalf with Employee Central and that the case will be closed in the Integrity Helpline system to avoid unnecessary retention of personal data. For Employees based in non-EU locations who file HR-related matters, the Ombuds/Ethics Team will refer such reports to Employee Central for investigation.

If the Integrity Helpline cannot accept a question or report about your concern, the company encourages you to talk with your manager or a higher-level manager in your reporting line, log your concern in Employee Central, contact your HR representative or a Business Ethics Officer.

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CAN I MAKE A REPORT TO THE INTEGRITY HELPLINE WITHOUT GIVING MY NAME?

Yes. While we encourage you to identify yourself to enhance our ability to gather necessary information, if you are not comfortable providing your name, you can file a report anonymously. EthicsPoint does not use any technology to trace online reports or telephone calls, and telephone calls are never recorded. Even if you remain anonymous, you will still create a password and be given a unique report key that you will need to check on the status of your question or report, to add information to the report, or to correspond with the company's Ombuds/ Ethics team.

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IF I MAKE A REPORT USING THE INTEGRITY HELPLINE, WILL MY REPORT BE KEPT CONFIDENTIAL?

The company will endeavor to keep information you provide confidential to the extent reasonably possible, consistent with our commitment to investigate the information and our obligation to comply with applicable laws and regulations.

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WHAT IF I AM NOT SURE IF I AM REPORTING ACTIVITY THAT IS A VIOLATION?

You should make the report. The Integrity Helpline is a resource to ask a question or make a report about a situation that simply may not feel right. By using the Integrity Helpline, you can make sure your questions get to the right people, so you get the answers you need. You should never try to investigate or confirm issues yourself as it could compromise the investigation process.

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WHAT IF I WANT TO REPORT A VIOLATION BY A MEMBER OF THE OMBUDS/ ETHICS TEAM OR A BUSINESS ETHICS OFFICER?

You can report it using the Integrity Helpline. EthicsPoint will block the member of the Ombuds/Ethics team from accessing that specific report. However, if you are not comfortable reporting it through EthicsPoint, please report the concern to the General Counsel, a member of the Internal Audit team, Employee Central or an HR business partner. The concern will be thoroughly investigated.

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WHAT IF I AM AFRAID OF BEING RETALIATED AGAINST FOR MAKING A REPORT ON THE INTEGRITY HELPLINE?

The ability to openly ask questions or communicate ethics and compliance concerns without fear of retaliation is essential to the success of our ethics and compliance program. PayPal does not tolerate retaliation against any person for asking questions or for reporting concerns in good faith. If you feel you have experienced any form of retaliation as a result of making a report or raising an issue, promptly report it just as you would any other inappropriate behavior.

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WHAT HAPPENS IF I SUBMIT A REPORT BY MAIL OR EMAIL, RATHER THAN THROUGH THE INTEGRITY HELPLINE?

Reports by regular mail or email can also be sent to the Ombuds/ Ethics team and will be reviewed by a member of the department. The team will log a report by proxy for you through the Integrity Helpline. The Ombuds/ Ethics team has a process in place to appropriately handle all reports. Please provide as much detailed information as possible about your concern, such as names of witnesses, dates, location, and potential victims of the alleged unethical or

illegal conduct. By using the web form, you can also upload file attachments such as supporting documentation you believe will be useful to investigators.

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WHAT IF I THINK MY MANAGER OR OTHER MEMBER OF MANAGEMENT IS INVOLVED IN A VIOLATION, SHOULD I STILL MAKE THE REPORT USING THE INTEGRITY HELPLINE?

Yes, you should still make the report. Our standards apply to all employees regardless of their position within the company. Unlawful or unethical behavior can cause harm to employees, our business or our reputation. Our leaders and managers have a responsibility to be role models by demonstrating ethical behavior at all times.

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WHAT IF I REMEMBER SOMETHING IMPORTANT ABOUT THE INCIDENT AFTER I HAVE SUBMITTED A REPORT THROUGH THE INTEGRITY HELPLINE? HOW CAN I PROVIDE ADDITIONAL INFORMATION?

When you submit a report using the Integrity Helpline web portal or through the Integrity Helpline phone numbers, you receive a unique report key and are asked to choose a password. These credentials allow you to return to the Integrity Helpline again by Internet or telephone and access the original report to answer questions from the investigator or add information to the original report. If you lose your report key and password, you may provide any additional information to speakup@paypal.com or create a new report in the Integrity Helpline and reference your previous report.

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Will the company really do anything about a report I make on the Integrity Helpline?

Yes. The company takes all reports and allegations seriously and devotes the appropriate time and resources to investigate them. If the information you provide is proven and a violation of the law, the Code of Business Conduct & Ethics, or corporate policy has occurred, appropriate corrective action will be taken.

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WILL I EVER HEAR ABOUT THE OUTCOME OF A REPORT I MAKE ON THE INTEGRITY HELPLINE?

The company treats each report in a professional and confidential manner consistent with our commitment to investigate the information and our obligation to comply with applicable laws and regulations. After an investigation, the company will update the status of a report when a case has been closed. However, due to confidentiality concerns, we do not report the detailed results of our investigations or disciplinary actions.

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