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### **About EthicsPoint**

#### **What is EthicsPoint?**

EthicsPoint is a comprehensive and secure reporting tool that helps company employees and management to work together in addressing fraud, abuse, and other misconduct in the workplace.

#### **Why do we need a system like EthicsPoint?**

**Condé Nast** strives to create and maintain a positive work environment where all employees are valued and can perform their best. We believe that open channels of communication contribute significantly to this effort and can foster a culture of integrity and ethical decision-making. By allowing employees to submit reports anonymously, EthicsPoint becomes a powerful tool for all of us to address misconduct, fraud or abuse in the workplace.

### **Reporting – General**

#### **How can I report a concern?**

If you observe behavior that you think violates our code, we expect you to report it. You can raise your concern with your direct manager, another manager, Legal or the People Team.

If you are not comfortable reporting the issue in one of these ways, you can report using EthicsPoint either by phone or online. Using EthicsPoint gives you the option to report anonymously, if you prefer.

#### **What type of situations should I report?**

We expect that you will report any violation of our code, or any other concern you may have.

#### **I'm not sure whether I should report what I saw?**

We all have the right to work in a positive environment and with that right comes the responsibility to act in an ethical manner. As a Condé Nast employee, it is your duty to understand and uphold the ethical standards of the company, including taking action to report any violations.

Corporate misconduct can threaten the livelihood of an entire company. By working together, we can maintain a healthy and productive environment.

### **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 our strengths and our flaws. By reporting activity that causes you concern, you can minimize the potential negative impact on our company and our people. Also, your input may help identify issues that can improve corporate culture and performance.

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

Once a report is submitted using EthicsPoint, depending on the type of violation and location of the incident, it is directed only to the specific individuals within the company who are responsible for evaluating it. A report will be shared only with the individuals who have a need to know the information (e.g., employees involved in conducting a follow-up investigation). Further, each of the report recipients understands the importance of maintaining confidentiality and handling information appropriately.

## **Reporting Security & Confidentiality**

### **Are reports confidential?**

Reports are kept as confidential as possible and will be shared only with people who have a need to know the information (e.g., individuals responsible for evaluating and investigating the report, employees or others who may have additional information). Remember that you can file a report anonymously, if you choose to do so.

### **Can I file a report from home and still remain anonymous?**

Whether you file a report from home, a neighbor's computer, or any other Internet portal, you can choose to file anonymously. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away IP addresses.

### **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 is designed to enable the filing of anonymous reports. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal information about your identity. For example, avoid saying, "From my cube next to Jan Smith..." or "In my 33 years..."

### **Is the telephone toll-free hot line secure and anonymous too?**

Yes. Calls to EthicsPoint will be answered by an interviewer who will ask you to provide the same information that is required when reporting online. The interviewer will enter your responses into the EthicsPoint website and these reports have the same security and confidentiality measures applied to them as reports submitted online.

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

You are not obligated to identify yourself when reporting, but if you would like to do so, there is a section in the report where you can enter your information. We encourage you to identify yourself so that we may more efficiently follow up with any questions we may have and reach the root cause of the situation more quickly.

## **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?**

**Condé Nast** chooses to promote ethical behavior. Unethical conduct, at any level, ultimately hurts the company and all employees, including you. All it takes is one ethical lapse by a company employee to negatively impact a company's reputation.

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. 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 manager is involved in a violation? Won't they get the report and start a cover-up?**

No. The EthicsPoint system and report distribution processes are designed so that implicated parties are not notified or granted access to reports in which they have been named. Name matches and close matches are identified so please be as specific as possible when naming the implicated parties (ensure spelling is correct and include nicknames or any other names the person goes by).

### **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, you receive a unique user name and are asked to choose a password. We encourage you to return to the EthicsPoint system again, either online or by phone, to access the original report, add additional detail or answer questions posed by a company representative.

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

All correspondence using EthicsPoint is held to the same high standard of confidentiality.

**What if I lose my Report Key (the unique code provided after you complete a report) or forget the Password I created?**

To ensure that security is maintained, if you lose your report key or password, you will need to submit a new report. When submitting the new report, please mention 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 submit a report by calling the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.

If you are able to access the internet, you can file an EthicsPoint report from any device whether that's a mobile device or a computer at home or in a public library.

However you make your report, please know that you are helping to contribute to maintaining a positive and ethical work environment. Thank you.