

Ethics Reporting

1-866-ETHICSP

www.ethicspoint.com

Hawaiian Telcom is the premier telecommunications company in Hawaii and we intend to keep it that way. Through superior products and services, we can continue to grow and thrive as a strong, locally managed company and serve our customers in the best way possible. In order to accomplish this, we also need the highest standards of ethics and integrity, so customers, investors and employees know beyond any doubt that we are a trustworthy company. To support our commitment to ethics and integrity, we have created two tools that can be used to report actual or suspected unethical activity, violations of company policy and concerns regarding accounting and auditing matters: the HT Ethics Hotline and the EthicsPoint website. These tools are available to Hawaiian Telcom's employees, officers, directors, agents, contractors and suppliers.

All reports submitted through these tools will be handled promptly and discreetly. No retaliatory action will be taken against anyone for reporting or inquiring in good faith about actual or suspected unethical activity. Callers will have the option to remain anonymous.

HT Ethics Hotline

Confidential and anonymous reporting provided by Hawaiian Telcom through EthicsPoint®.

There are three ways to report:

Toll-Free Phone 1-866-ETHICSP (384-4277)



Hawaiian Telcom Intranet - Clicking the EP link will direct you to the EthicsPoint Website where you may file a report online.

Internet – from any computer with internet access (home, office, library, etc.) by accessing www.ethicspoint.com

Let us answer some frequently asked questions about EthicsPoint and let us show you how simple it is to file a report. Just click on the links below!

[Q & A for Employees](#)

[How to File a Report](#)

Q & A for Employees

What are the HT Ethics Hotline and the Ethicspoint Website?

Both the HT Ethics Hotline and Website are simple and risk-free ways for you to anonymously report actual or suspected unethical activity and violations of company policy. The HT Ethics Hotline and the Website are staffed by independent, third-party resources and are available 24 hours a day, 7 days a week.

Why are these tools important to Hawaiian Telcom?

Hawaiian Telcom is committed to conducting business in accordance with the highest ethical and legal standards. The HT Ethics Hotline and Website are effective ways to report suspected unethical activity and violations of company policy.

Who should use the Hotline and Website?

If you have information regarding actual or suspected unethical activity or violations of company policy, your first option is to report that information to your supervisor, Human Resources, Legal Department, Corporate Security or Internal Audit. If you are uncomfortable with this direct approach, call the HT Ethics Hotline toll-free (1-866-ETHICSP (384-4277)) or access www.ethicspoint.com from your home or office.

What should I report to the HT Ethics Hotline or the EthicsPoint Website?

Call the HT Ethics Hotline or access the Website to report suspected unethical activity related to:

- Accounting and Auditing Matters
- Securities Violations
- Disclosure of Confidential Information
- Antitrust Activity
- Conflict of Interest
- Embezzlement
- Falsification of Contracts, Reports or Records
- Theft
- Discrimination or Harassment
- Misconduct or Inappropriate Behavior
- Sexual Harassment
- Substance Abuse
- Violation of Policy
- Environmental Protection, Health or Safety Law
- Violence or Threat
- Unsafe Working Conditions

Do I have to give my name?

No. You may give your name if you want to, but you are not required to identify yourself. Communication to the HT Ethics Hotline or the EthicsPoint Website is handled by an independent, third-party compliance specialist who gives a unique identification number to your call or Internet Report. You can refer to this identification number for any follow-up communications. The HT Ethics Hotline is staffed 24 hours a day, seven days a week for your convenience. The Website is also available 24 hours a day, seven days a week.

What happens when I make a call or visit the EthicsPoint Website?

Once the compliance specialist receives your report, an investigation will be conducted and appropriate action will be taken. To protect everyone involved, no disciplinary or legal action will be taken based only on HT Ethics Hotline calls or web-based reports. Any action taken will be based on research into the report.





What if I don't have all the facts?

Call the HT Ethics Hotline or access the EthicsPoint Website even if you are not sure there is a problem. Hawaiian Telcom will look into the information you do provide, attempt to verify it and take appropriate action.

What else should I know about the HT Ethics Hotline and Website?

These reporting tools are available to you because Hawaiian Telcom is committed to the highest standards for ethics and integrity. Report suspected problems when you see them by calling 1-866-ETHICSP (384-4277) or visiting www.ethicspoint.com.

How to File a Report

<p>What is the EthicsPoint® Reporting System?</p>	<p>The HT Ethics Hotline and Website are simple and risk-free ways for you to anonymously report actual or suspected unethical activity and violations of company policy. The Hotline and the Website are staffed by an independent, third-party resource and available 24 hours a day, 7 days a week.</p> <div style="text-align: center;">  <p>ethics·point <small>integrity of work</small></p> </div>												
<p>Reporting is easy.</p> <p>If you have information regarding actual or suspected unethical activity or violations of company policy, your first option is to report that information to your supervisor, Human Resources, Legal Department, Corporate Security or Internal Audit. If you are uncomfortable with this direct approach, use the EthicsPoint Reporting System.</p>	<ul style="list-style-type: none"> • Access the EthicsPoint Reporting System and complete a report. • Create a password. • Follow-up 1 business day later. <p>The Reporting System is designed to allow you to maintain your confidentiality and anonymity when submitting and following up on a report.</p>												
<p>Step 1: Access the Reporting System.</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: black; color: white;"> <th colspan="3" style="text-align: center; padding: 5px;">3 Easy Ways to Report</th> </tr> </thead> <tbody> <tr> <td style="width: 33%; padding: 5px; vertical-align: top;"> <p>1. Click on Icon:</p> <div style="text-align: center;">  </div> </td> <td style="width: 33%; padding: 5px; vertical-align: top;"> <p>2. Go to:</p> <p style="text-align: center;">www.ethicspoint.com</p> </td> <td style="width: 33%; padding: 5px; vertical-align: top;"> <p>3. Call:</p> <p style="text-align: center;">1-866-ETHICSP (384-4277)</p> </td> </tr> <tr style="background-color: cyan;"> <td style="text-align: center; padding: 5px;">Hawaiian Telcom Intranet</td> <td style="text-align: center; padding: 5px;">Internet</td> <td style="text-align: center; padding: 5px;">Toll-Free Phone</td> </tr> <tr> <td style="padding: 5px; vertical-align: top;"> <p>File a Report via EthicsPoint's secure web site.</p> </td> <td style="padding: 5px; vertical-align: top;"> <p>From any computer with Internet access (home, public library, etc.), go to www.ethicspoint.com and click on "<i>File a New Report.</i>"</p> </td> <td style="padding: 5px; vertical-align: top;"> <p>Call EthicsPoint's toll-free hotline. A compliance specialist will assist you in entering your report into the EthicsPoint Reporting System.</p> </td> </tr> </tbody> </table>	3 Easy Ways to Report			<p>1. Click on Icon:</p> <div style="text-align: center;">  </div>	<p>2. Go to:</p> <p style="text-align: center;">www.ethicspoint.com</p>	<p>3. Call:</p> <p style="text-align: center;">1-866-ETHICSP (384-4277)</p>	Hawaiian Telcom Intranet	Internet	Toll-Free Phone	<p>File a Report via EthicsPoint's secure web site.</p>	<p>From any computer with Internet access (home, public library, etc.), go to www.ethicspoint.com and click on "<i>File a New Report.</i>"</p>	<p>Call EthicsPoint's toll-free hotline. A compliance specialist will assist you in entering your report into the EthicsPoint Reporting System.</p>
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<p>Step 2: Complete a Report and Create a Password.</p>	<p>Following the compliance specialist or on-line instructions, complete a report, being as thorough as you can.</p> <ol style="list-style-type: none"> 1. Specify the kind of report you'd like to make from the list of issues. 2. Read or listen to the anonymity information carefully. Click on or 												

	<p>say "I agree."</p> <p>3. Complete the report by providing the following information about the incident: Who: persons engaged in the incident, including titles; What: what specifically occurred; Where: the location of the incident; When: the time and duration of the incident.</p> <p>4. Create a Password. The EthicsPoint Reporting System will generate an identification code called a "Report Key." Write down both the password and Report Key, and keep them in a safe place. You will need them to follow-up, review or amend your report.</p>
<p>Step 3: Follow-up one Business Day Later.</p>	<p>One business day after you complete your report, return to the EthicsPoint system to see the status of the report and if there are any follow-up questions or requests.</p> <ol style="list-style-type: none"> 1. Return to the EthicsPoint Reporting System using the HT Intranet Website, Internet, or Toll-Free Phone. 2. Log in to follow-up on your initial report. 3. Provide Report Key and Password. 4. If you accessed through the Toll-Free Phone line, a compliance specialist will assist you in reviewing report details, responding to questions, and adding information. 5. If you accessed through HT's network or over the Internet, you may now review report details, respond to questions, and add information by doing the following: <ol style="list-style-type: none"> a. Review your report by clicking on "Review Report Details." b. If there are questions, type answers into the question box and click "submit." c. Add information by using the "Submit New Information" box. d. If you have agreed to participate in an EthicsChatsm, click "Chat About This Report" at the specified time. Type your comments into the field at the bottom of the window and click "Submit." <p>EthicsChat An EthicsChatsm is a real-time communication between you and a company representative to clarify details and answer questions. Like the rest of the EthicsPoint Reporting System, it is confidential and anonymous.</p>