



The Howard Hughes Corporation's "Whistleblower" Hotline

What is The Howard Hughes Corporation's "Whistleblower Hotline?"

The Howard Hughes Corporation (HHC) has contracted with an independent third-party communication specialist team, Global Compliance, to receive communications relating to your concerns. Your call or message through our website remains anonymous and will be assigned a unique identification number that you can refer to for future follow-up. Global Compliance is staffed 24 hours per day, 7 days a week for your convenience and can be reached at **1-800-766-8125** or via their website at <https://howardhughes.alertline.com>.

What happens if I call or submit a concern via the website?

Once HHC Legal and Internal Audit team receive the report, they will immediately contact the appropriate management team to conduct additional fact-finding into any allegation. It is important, however, that you disclose as many details as possible to ensure thorough fact-finding can be completed. Information that you can expect to be asked from the Global Compliance operator would include:

- Specific details/examples of such conduct
- Individual(s) involved in the alleged behavior
- Witnesses to the conduct

What should be reported?

Some examples of potential problems would include, but are not limited to:

- Conflict of Interest
- Disclosure of Confidential Information
- Discrimination
- Violation of Environmental Law & Regulations
- Fraudulent Activities
- Questionable Accounting, Internal Accounting Controls and Auditing Matters
- Harassment
- Substance/Alcohol Abuse
- Theft, Kickbacks & Excessive Gifts
- Violation of Behavior Standards
- Violence, Safety, Health
- Retaliation against Employees who, in Good Faith, make Report

Every employee has an obligation to report suspected misconduct by contacting appropriate HHC personnel, Human Resources, or contacting Global Compliance via phone (**1-800-766-8125**) or via Global Compliance's dedicated HHC website (<https://howardhughes.alertline.com>).

No employee will be penalized, formally or informally, for filing a report, in good faith, with HHC personnel, Human Resources, or Global Compliance. Retaliation against any person who voices a concern, files a complaint with HHC personnel, Human Resources, or Global Compliance or participates in any subsequent related investigation is prohibited.