

POLICY ON REPORTING AND INVESTIGATING CONCERNS OF SUSPECTED MISCONDUCT

It is AARP's¹ policy to comply with applicable laws and regulations and established policies, including those that ensure the integrity and accuracy of AARP and its affiliated entities' financial condition. Information concerning actions or failure to act that negatively impacts AARP's ethical environment is important; prompt disclosure of such information is encouraged. To that end, it is the policy of AARP to:

1. Encourage reporting of suspected misconduct.² Several avenues for doing so are available, including disclosure on an anonymous basis (see section below on *Channels for Reporting*).
2. Address those concerns in a reasonably prompt manner.
3. Perform adequate investigative procedures to ensure concerns are valid and made in "good faith" (i.e., allegations made with reasonable factual basis to support them).
4. Keep the concerns confidential to the extent possible, consistent with the need to conduct an adequate investigation.
5. Disclose such concerns to AARP's Audit Committee (and any other governing body as appropriate), along with the corrective action taken or planned to address the concerns. The General Counsel will provide the summary of all reported concerns to the committee at its regularly scheduled meetings. Any concerns related to fraudulent financial reporting, or of a highly significant nature (e.g., dealing with senior management), will be reported immediately to the Audit Committee Chair upon initial receipt of the concern, in order to determine the appropriate next steps to take.
6. Maintain a record of all such concerns, along with the investigative outcomes, on a confidential basis in the Office of General Counsel.
7. Ensure that any individual who brings such concerns forward will not be subject to any adverse action based on the disclosure of those concerns made in good faith.

Channels for Reporting: Concerns about suspected misconduct should be reported immediately through any one of the following channels so that appropriate action can be taken. Individuals that report a concern can remain anonymous or identify themselves. Except as may be required by law and to conduct an adequate investigation, every

¹ This policy applies to AARP and its affiliated entities, the AARP Foundation, AARP Services, Inc., AARP Insurance Plan, and Legal Counsel for the Elderly.

² "Misconduct" includes such things as: theft or misuse of AARP resources (including confidential information), fraudulent financial reporting, conflicts of interest, expense account abuse, vendor-related fraud, check fraud, and harassment.

effort will be made to keep the identity of the person who made the report confidential. AARP prohibits retaliation against those that raise concerns in good faith.

- Report concerns to your manager who is responsible for proceeding appropriately.
- Report concerns by phone, e-mail, regular mail, or submission in the secure drop boxes located throughout the National Office buildings to the:
 1. General Counsel;
 2. Chief Ethics & Compliance Officer; or
 3. Chief Human Resources Officer.
- Report concerns via YRVoice, a 24/7/365 phone and web line by contacting 1-855-YRVoice (978-6423) or <https://www.reportlineweb.com/AARP>. A reference number will be provided so that additional information can be requested and provided.
- You may also report concerns directly to the Chairperson of the governing body of the appropriate entity:
 - AARP: Chair of the AARP Audit Committee, c/o AARP, Office of Corporate Secretary, 601 E Street, NW, Washington, DC 20049 (*mark the envelope "personal and confidential"*)
 - AARP Foundation: Chair of the AARP Foundation Audit Committee, c/o AARP Foundation, Office of the President, 601 E Street, NW, Washington, DC 20049 (*mark the envelope "personal and confidential"*)
 - AARP Insurance Plan: Chair of the Board of Trustees, c/o AARP Services, Inc., Office of General Counsel, 650 F Street, NW, Washington, DC 20004 (*mark the envelope "personal and confidential"*)
 - AARP Services, Inc.: Chair of the ASI Audit Committee, c/o AARP Services, Inc., Office of General Counsel, 650 F Street, NW, Washington, DC 20004 (*mark the envelope "personal and confidential"*)
 - Legal Counsel for the Elderly: Chair of the LCE Board of Directors, c/o AARP, Legal Counsel for the Elderly, 601 E Street, NW, Washington, DC 20049 (*mark the envelope "personal and confidential"*)

Information Required to Investigate Concerns: The following information is needed to conduct an adequate investigation:

- Date of Submission of Concern or Complaint
- Description of the nature of the suspected misconduct (*Please be as descriptive as possible about the activities.*)

- Name of the employee(s), volunteer(s), or contingent worker(s), and his/her department or program (or vendor or service provider employee) suspected of engaging in the activity
- Approximate or actual date the activity took place
- Names of anyone who may have knowledge of the misconduct