



Corporate Policy: <b>Federal Contracting Policy</b>	Last Revised: <b>March 2023</b>
Department Owner: <b>Legal - Compliance</b>	Applicable To: <b>All Personnel Supporting Federal Contracts and/or Interacting with Federal Employees</b>

## Contents

<b>1.0</b>	<b>PURPOSE</b>	<b>2</b>
<b>2.0</b>	<b>SCOPE</b>	<b>2</b>
<b>3.0</b>	<b>POLICY</b>	<b>3</b>
3.1	<i>RESTRICTIONS ON BRIBES, GIFTS, GRATUITIES AND POLITICAL CONTRIBUTIONS .....</i>	<i>3</i>
3.2	<i>CONFLICTS OF INTEREST.....</i>	<i>4</i>
3.3	<i>CURRENT AND FORMER GOVERNMENT EMPLOYEES .....</i>	<i>5</i>
3.4	<i>SEEKING GOVERNMENT WORK.....</i>	<i>6</i>
3.5	<i>PERFORMING GOVERNMENT WORK.....</i>	<i>8</i>
3.6	<i>PROPRIETARY AND SENSITIVE INFORMATION AND INTELLECTUAL PROPERTY.....</i>	<i>9</i>
3.7	<i>RELATIONSHIPS WITH SUBCONTRACTORS AND SUPPLIERS.....</i>	<i>9</i>
3.8	<i>WORKFORCE REQUIREMENTS.....</i>	<i>10</i>
3.9	<i>REPORTING VIOLATIONS .....</i>	<i>11</i>
<b>4.0</b>	<b>ENFORCEMENT</b>	<b>11</b>
<b>5.0</b>	<b>CONTACTS</b>	<b>12</b>
<b>6.0</b>	<b>REFERENCES</b>	Error! Bookmark not defined.

## 1.0 PURPOSE

The purpose of this *Federal Contracting Policy* (“Policy”) is to ensure that all Charter Communications (“Charter”) personnel (employees, agents, contractors, etc.) who support Charter’s provision of services to federal governmental entities understand the legal requirements and ethical restrictions that apply to our work on federal government contracts and interactions with federal government personnel.

## 2.0 SCOPE

This Policy applies to Charter personnel who work on contracts with, or otherwise provide services to, the federal government or federal agencies. Charter’s *Code of Conduct* maintains high standards governing how Charter employees must conduct business and those standards are consistent with the requirements contained in this Policy. In addition to the standards set in the Code of Conduct, anyone performing work in connection with a federal government contract must comply with the requirements set out in this Policy.

All Charter employees, agents, and contractors, (hereinafter collectively referenced as “**Charter personnel**”) who market or sell to or work on projects with the federal government or interact with federal government officials and employees are expected to read and comply with this Policy. This includes, but is not limited to, such departments as Spectrum Enterprise, Spectrum Reach, Sales & Marketing, and Government Affairs.

The requirements described below provide specific requirements for conducting business in connection with federal government contracts. To the extent a conflict arises between this and any other Charter policies, this Policy will control any issue related to the contracting with, or providing services to, the federal government.

For purposes of this Policy, the term “**Government**” means the federal government, its agencies, and departments, and any state or local governmental agencies when such agencies are using federal funding or otherwise incorporate federal government laws and regulations to contract for services or products. Examples of agencies and departments include but are not limited to the U.S. Department of Defense, the U.S. Army, the U.S. Department of Energy, the Social Security Administration, and the U.S. Environmental Protection Agency. This includes any federal institution such as a military base or any other institution that receives federal funding, such as, educational, housing, medical, or research facilities. It is important to note that these restrictions must be applied more broadly than just federal agencies: they apply to any institution with federal contracts and/or federal workers.

“**Government Employee**” is an employee or someone representing the Government (e.g., a federal contractor). This definition includes a Government Employee’s or representative’s family as well.<sup>1</sup>

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<sup>1</sup> For purposes of this Policy, a family member includes the Government Employee’s spouse, parents (step), children (step), siblings (step), in-laws (mothers, fathers, sisters, brothers, sons, and daughters), grandparents/children, aunts, uncles, cousins, nieces, nephews, and members of the same household whether or not related (including domestic partners and their related family members but not roommates/housemates).

## 3.0 POLICY

### 3.1 RESTRICTIONS ON BRIBES, GIFTS, GRATUITIES AND POLITICAL CONTRIBUTIONS

#### General Restrictions on Government Business Interactions

- Do not provide or offer to provide anything of value to a Government Employee or someone representing the Government in order to influence official action.
- Do not provide anything of value to Government Employee without seeking and receiving prior written approval from your Department Vice President and supporting Charter Legal Department attorney. Government Affairs follows a separate protocol.
- Do not offer a gift of free attendance at a conference or other meeting (that charges an entry fee for general admission) to a Government Employee without seeking and receiving prior written approval from your Department Vice President and supporting Charter Legal Department attorney. Government Affairs follows a separate protocol.
- Do not offer a gift of free travel to a Government Employee without seeking and receiving prior written approval from your Department Vice President and supporting Charter Legal Department attorney. Government Affairs follows a separate protocol.

#### Bribes

Charter personnel must never offer or give, either directly or indirectly (through an intermediary such as an agent), bribes or illegal gratuities to Government representatives. A bribe is something of value given with the intent to influence an official act, such as awarding a contract to Charter. Charter is committed to marketing our services solely on their merits and shall strive to avoid even the appearance of trying to buy Government business or curry favor.

Charter personnel must not make or offer any facilitating or expediting payments to a Government Employee. A facilitating payment is a payment made with the purpose of expediting or securing performance of a Government action by a Government Employee, political party, or party official.

#### Giving Gifts or Gratuities

When dealing with Government Employees, entertainment practices that may be acceptable when dealing with other customers and prospective customers may be unacceptable or even against the law.

Government Employees may be prohibited from soliciting or accepting, directly or indirectly, a gift from Charter. A "gift" is defined very broadly and includes anything of value, including any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, training or other item of monetary value, whether provided in-kind or through reimbursement.

This restriction extends to circumstances that may not normally be considered a "gift" or even a business courtesy. Some examples include providing free attendance to Charter sponsored conferences or similar events, providing small incentives (like gift cards) to complete questionnaires, and paying airfare for scheduled speakers.

Charter personnel shall not offer or provide gifts to Government Employees or to Government Agencies, or to contractors working on their behalf. Government Affairs shall follow its own protocols for gifts or donations to Government Employees or Government Agencies, or to contractors working on their behalf.

**Note: Local and state governments may have different rules and requirements regarding gifts. Employees (other than Government Affairs, which has a separate protocol and manages political contributions made on behalf of Charter) must therefore seek prior written approval from Charter’s Government Affairs team, their Department Vice President, and Charter’s Senior Vice President, Litigation or General Counsel via [Ethics Line](#) before offering anything of value to local or state government agencies, employees, or public officials if making donations to local or state governments on behalf of Charter.**

#### Accepting Gifts and Gratuities is Forbidden

Charter personnel must not ask for or accept anything of value from any Government Employee who is doing or seeking to do business with Charter or from any of Charter’s competitors.

#### Political Contributions

As described in Charter’s *Pay to Play Policy*, director-level and above employees involved in soliciting or negotiating Government contracts and all employees with a title of Executive Vice President or higher must pre-clear, via the Legal department, any direct or indirect personal contributions (monetary and/or in-kind) made to political entities in certain state and local jurisdictions. This requirement applies to political contributions made to, or solicited on behalf of, any candidate, political party committee, or other political committee (e.g., a PAC) in those jurisdictions. Moreover, these requirements may apply to the family members of ‘applicable employees’. Refer to the full policy for detailed information including pre-clearance instructions.

### **3.2 CONFLICTS OF INTEREST**

In addition to the conflict of interest policies as provided in the *Code of Conduct* and Charter’s *Conflict of Interest Policy*, the policies below apply to conflicts of interest with respect to contracts with and services provided to the Government. Charter employees should consult with their Department Vice President or supporting Charter Legal Department attorney if unsure whether a situation poses a possible conflict of interest.

#### Personal Conflicts of Interest

Charter personnel must avoid exposing themselves or Government Employees to personal conflicts of interest. Such financial interests, personal activities, or relationships that could expose Charter or Charter personnel to risk are described in Charter’s *Conflict of Interest Policy*. However, a personal conflict of interest -- a financial interest, personal activity, or relationship – that could impair a Government Employee’s ability to act impartially and in the best interest of the Government are also forbidden. For example, a Government Employee’s acceptance of a gift, investment interests, or a spouse’s employment with Charter may give rise to a personal conflict of interest. Those situations are addressed throughout this Policy.

#### Organizational Conflicts of Interest

Charter personnel must avoid putting Charter in the position of an organizational conflict of interest. The Government has organizational conflict of interest rules that are intended to prevent the existence of conflicting roles that might bias the contractor’s judgment or advice and to prevent unfair competitive advantages. For example, a contractor generally cannot draft specifications for bids for services for the Government and then compete in the resulting bidding process. Also, a contractor generally cannot evaluate its own proposal in a competition or its own work during performance on behalf of the Government.

Charter employees must report in writing via Ethics Line to their Department Vice President and supporting Charter Legal Department attorney if they become aware that a situation possibly poses a possible personal or organizational conflict of interest.

### **3.3 CURRENT AND FORMER GOVERNMENT EMPLOYEES**

In order to avoid the appearance of conflicts of interest, there are legal restrictions on Charter's ability to interview or hire current Government Employees, and there are other restrictions that limit the ability of former Government Employees to perform certain functions after leaving the Government. Local and state governments may have different rules and requirements regarding interviewing or hiring their personnel.

#### Employment Discussions with Government Employees

Charter employees shall not offer or discuss employment with a Government Employee while that employee is participating in a matter relating to Charter. Given the complexities and risks in this area, Charter employees must seek prior written approval from their Department Vice President and supporting Charter Legal Department attorney via Ethics Line prior to discussing an employment relationship with, or offering employment to, current Government Employees.

#### Former Government Employees and Revolving Door Restrictions

Former Government Employees are subject to "revolving door" restrictions that limit their post-Government activities. Of particular importance, former Government Employees of federal offices and agencies are subject to a lifetime ban on appearing before their agencies on matters with which they were personally and substantially involved, as well as a two-year ban covering matters within their general area of official responsibility. Former senior Government Employees responsible for procurements are subject to even stricter post-employment restrictions. In addition, local and state governments have different rules and requirements. These and other "revolving door" restrictions are complex.

Charter employees must seek prior written approval from Charter's Government Affairs team, their Department Vice President, and supporting Charter Legal Department attorney via Ethics Line before retaining, hiring, or offering employment to former Government Employees. Further, Charter Employees involved in employment discussions with current and former Government Employees are expected to know that certain limitations may apply to the activities the employee would be able to perform if he or she joined Charter.

#### Hiring a Government Employee for Consulting Work

Current Government Employees may be allowed to enter into consulting arrangements with Charter. However, such relationships are subject to strict limitations and Government pre-approval requirements. Before even discussing a potential consulting relationship with a Government Employee, Charter Employees must seek prior written approval via Ethics Line from their Department Vice President, Charter's Government Affairs team, and supporting Charter Legal Department attorney.

### 3.4 SEEKING GOVERNMENT WORK

In addition, the Code of Conduct's prohibitions against violations of antitrust laws, the following policies shall apply when Charter seeks Government work.

#### Competition

Charter competes fairly and follows the rules applicable to competition. While Charter is involved in a Government competition for a contract, Charter personnel shall not offer or discuss future employment or business opportunities with any Government procurement officials or offer or give anything of value to those officials.

Charter avoids even the appearance of anti-competitive practices, such as price fixing and bid rigging. For example, Charter personnel must not discuss pricing for Government procurements with competitors or agree to artificially increase or decrease our prices.

#### Proprietary or Sensitive Information

Charter personnel shall not seek or obtain competitors' non-public proprietary information or Government sensitive information relating to a procurement. The Government procurement process is subject to strict rules to protect the integrity of the competition. One of the focuses of those rules is to make sure that competitors do not obtain an unfair advantage through access to protected Government information or protected information of another competitor. Seeking or obtaining such information is illegal. Accordingly, possessing unauthorized protected information will not be tolerated by Charter.

Examples of protected Government information include:

- Any documents reflecting a Government agency's intentions, including source selection and technical evaluation plans;
- Any documents reflecting the agency's evaluations of offerors' proposals;
- Any documents reflecting competitive range determinations, rankings of offerors, or recommendations for award; and
- Any documents marked "source selection information" or with a similar legend.

Examples of protected competitor information include:

- Any information related to cost or pricing, or methods for developing cost or pricing that is not in the public domain;
- Any information about proprietary processes and business strategy that is not in the public domain; and
- Any documents marked "bid or proposal information".

If such information inadvertently comes into possession of Charter personnel that information must be isolated and secured to prevent further distribution. If this situation occurs, Charter personnel must immediately contact their Department Vice President and supporting Charter Legal Department attorney to explain where, when, how, and from whom the information was received.

As a reminder, Charter personnel are expected to protect confidential, internal or sensitive information at all times as laid out below as well as in the Company's *Confidentiality of Company Information, External Communications and Information Protection* policies.

### Kickbacks and Improper Payments

In this context, a “kickback” is a payment of a commission or other negotiated amount to a Government Employee to facilitate, or assist in, a bid or transaction. Charter personnel shall not pay “kickbacks” or other improper payments to Government Employees or to higher-tier contractors in order to induce Government business. Charter shall not give customers rebates, “alliance benefits,” or other consideration that is not transparent to the Government and that could be perceived as an improper attempt to influence Government business. Charter personnel who are unsure whether a business relationship complies with these limitations must seek written approval from their Department Vice President and supporting Charter Legal Department attorney for review before including such payments in an offer or business arrangement.

Charter shall not make payments to a company or an individual that are solely contingent on Charter receiving Government business. However, Charter may use a “bona fide” marketing agency in some circumstances, if that marketing agency neither exerts nor proposes to exert improper influence to solicit or obtain Government contracts nor holds itself out as being able to obtain any Government contract or contracts through improper influence. In this scenario, Charter may compensate bona-fide marketing agencies with payments conditioned on the marketing agency’s success in securing business on behalf of a contractor. Charter personnel are to refer any potential contingency-fee relationships to supporting Charter Legal Department for review.

### Cost and Pricing Information

Charter is required to submit current, accurate, and complete cost and pricing information to the Government. In connection with contract awards and modifications, the Government may require Charter to provide historical pricing information (including commercial sales practices and commercial or Government sales history) to allow it to compare such information to the pricing offered by Charter and to negotiate a “fair and reasonable” price. In some cases, Charter may be asked to certify that the information provided is “current, accurate, and complete.” Charter personnel must understand that these requirements are to be taken very seriously, and only authorized Charter personnel are to provide the requested information after coordinating with supporting Charter Legal Department.

### Lobbying

Contacts with Government Employees, be it local, state, or federal, for the purpose of influencing legislation, regulations, or decision making (including the decision to award a contract) may constitute lobbying that triggers registration and disclosure requirements. If a Charter employee or retained consultant communicates with any public official or the official’s staff, including any agency under control of the public official, Charter may be obligated to register as a lobbyist or comply with other lobbyist reporting regulations. All Charter personnel, including others working on our behalf (such as subcontractors), are responsible for understanding the applicable rules and must work with Government Affairs to ensure compliance in this area.

Under federal law, Charter is prohibited from using funds appropriated from the federal government to pay any person for lobbying federal officials in connection with the awarding of any federal contract.

### 3.5 PERFORMING GOVERNMENT WORK

Once awarded, Charter shall perform all contracts in compliance with specifications, requirements, and terms and conditions, whether contract-specific or required by applicable laws and regulations. Charter shall never substitute a different product or service for that promised to the Government without appropriate approvals. Charter shall not mischarge or overcharge the Government.

#### Books and Records

By contracting with the Government, Charter agrees that the Government may examine certain Charter financial records and cost data and may in some cases have the right to interview Charter employees. Some Charter information, such as information prepared for internal decision-making purposes, may not be subject to the U.S. Government's record examination rights. In the event the Government audits the Charter's contracts and the associated records, Charter personnel shall refer the matter to the Charter Legal Department for assistance in the audit. Records shall be maintained in accordance with Charter's *Records and Information Management Policy*.

#### Invoicing the Government

Some Government contracts may be subject to "cost principles" that limit the costs that a contractor can bill to the Government. If applicable to a Charter Government contract, Charter shall segregate allowable costs from unallowable costs, and shall not invoice the Government for, or include in our indirect cost rates, "unallowable" costs, including advertising, lobbying, and fines or penalties. Charter shall pass on to the Government any discounts or rebates received in connection with Government work when required by the applicable regulations and contract provisions. Charter shall follow federal guidelines limiting reimbursement for travel. Charter personnel must understand the importance of accurately tracking payments made by the Government and report any identified overpayments.

#### Country-of-Origin Restrictions

Charter's work with the Government may require that Charter use products produced or manufactured in the United States or other designated countries (generally countries that have entered into trade agreements with the United States or certain less developed countries). When these limitations apply, Charter shall not provide products from other countries. Charter shall not alter or remove the country of origin markings on products to be delivered to the Government. Charter shall not provide products from "prohibited source" countries, such as Cuba and Iran, with which the Government has decided not to do business.

#### Information Security

As applicable, Charter will provide adequate security for all covered information on covered contractor information systems, commensurate with consequences and probability of loss, misuse, or unauthorized access to, or modification of information, and rapidly report cyber incidents, as required by federal and agency regulations and contractual requirements. This may include stringent information security requirements under Federal Risk and Authorization Management Program ("FEDRAMP"), Federal Information Security Management Act ("FISMA"), National Institute of Standards and Technology ("NIST"), and Cybersecurity Maturity Model Certification ("CMMC"). Charter personnel shall refer to Charter's *Acceptable Use of Technology Policy* and *IT Security Policies and Plans* page on Panorama (Company Intranet).

### **3.6 PROPRIETARY AND SENSITIVE INFORMATION AND INTELLECTUAL PROPERTY**

#### Confidential and Proprietary Charter Information

In accordance with Charter's *Confidentiality of Company Information Policy*, protecting Charter confidential information is of the highest importance. When participating in a competitive procurement, Charter personnel shall mark all materials submitted to the Government as being prepared by Charter by using the legend "Charter Bid and Proposal Information, Confidential and Proprietary Charter Information", or other similar legend(s) as may be recommended by a Charter Legal Department attorney. Charter personnel shall carefully mark all other materials submitted to the Government as "Confidential and Proprietary Charter Communications Information", or other similar legend(s) as may be recommended by a Charter Legal Department attorney.

#### Intellectual Property

The Government generally is entitled to certain rights to intellectual property that is developed under a Government contract (or a Government grant or cooperative agreement). Charter personnel must consult with the Charter Legal Department prior to undertaking federally-funded developmental work that may result in the development of data or inventions to which intellectual property rights might attach.

### **3.7 RELATIONSHIPS WITH SUBCONTRACTORS AND SUPPLIERS**

#### Fair and Open Competition

When Charter serves as a prime contractor, we will strive to select subcontractors that offer fair and reasonable prices.

#### Small Businesses

It is Charter's practice to create opportunities for small businesses, including those owned by women, minorities, and veterans. Certain contracts require that contractors set goals for creating business opportunities for small businesses, including small businesses owned by women, minorities, and certain covered military veterans.

### 3.8 WORKFORCE REQUIREMENTS

In addition to Charter's commitment to equal employment opportunities to all qualified persons as discussed in Charter's *Code of Conduct*, *Employee Handbook*, and *Equal Employment Opportunity* policies, Charter is also committed to the following:

#### Anti-Human Trafficking

Charter is committed to conducting its business in compliance with all applicable anti-human trafficking laws and regulations. No Charter personnel or subcontractor shall traffic in persons or use any form of slave, forced, bonded, indentured, or prison labor. In compliance with federal Government policy (see FAR 52.222-50(b)), Charter personnel and its contractors shall not at any time: engage in forms of trafficking in persons; procure commercial sex acts; use forced labor in the performance of any contract or any other work; destroy, conceal, confiscate or otherwise deny access by an employee to the employee's identity or immigration documents; use misleading or fraudulent practices to recruit employees, including using recruiters that do not comply with local labor laws; charge recruitment fees to actual or potential employees; fail to provide transportation and/or fail to pay for the cost of return transportation upon the end of employment for (i) an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a Government contract or subcontract (for portions of contracts performed outside the U.S.), or (ii) an employee who is not a U.S. national and who was brought into the U.S. for the purpose of working on a Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee (for portions of contracts performed inside the U.S.), except for an employee who is (a) legally permitted to remain in the country of employment and chooses to do so or (b) exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation; provide or arrange housing that fails to meet host country housing and safety standards; or if required by law or contract, fail to provide a timely employment contract, requirement agreement, or other required work document in writing and in a language the employee understands.

Charter personnel or subcontractors who violate this Policy and/or any applicable anti-trafficking law shall be subject to discipline, up to and including termination. All Charter personnel and subcontractors are required to report any potential violation of Charter's policy or anti-trafficking laws and regulations of which they become aware to their manager, human resources representative, the General Counsel, or anonymously through the Ethics Line. There will be no retaliation against any person who reports a possible violation in good faith, regardless of whether a violation has actually occurred. In addition, Charter personnel may report concerns to the Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org).

#### Child Labor

Charter is committed to cooperating with authorities to end child labor. Pursuant to E.O. 13126, Charter shall cooperate with Government officials by providing reasonable access to records, documents, persons, or premises upon reasonable request to cooperate with authorities enforcing laws to prohibit the manufacture of importation or importation of products mined, produced, or manufactured by forced or indentured child labor.

#### Convict Labor

Charter complies with all requirements prior to extending an offer of employment. In accordance with E.O. 11755, Charter must not employ, in the performance of a Government contract, any person undergoing a sentence of imprisonment in the U.S. or its territories, unless one of the expressly permitted exceptions applies.

## Drug-Free Workplace

As outlined in the Charter's *Drug Free Workplace Policy*, Charter promotes a workplace that is free from drugs and illegal substances. All Charter employees are responsible for ensuring a healthy, drug-free work environment. Charter shall not tolerate illegal drugs or alcohol in the workplace. As a Government contractor, Charter is under additional scrutiny. Charter personnel shall not manufacture, possess, use, or be under the influence of drugs and illegal substances in the workplace. Employees who do not comply with this standard are subject to disciplinary action, including mandatory counseling programs and even termination. Employees are required to notify Charter in writing of a conviction under a criminal drug statute for a violation occurring in the workplace within five days of such conviction.

### **3.9 REPORTING VIOLATIONS**

Charter personnel should consult with their Department Vice President or supporting Charter Legal Department attorney with questions regarding this Policy. Charter personnel shall report when there is credible evidence in connection with a Government contract or subcontract that Charter has (1) received one or more significant Government overpayments; or (2) violated a federal criminal or civil law involving fraud, conflict of interest, bribery, or gratuities in relation to a Government contract or subcontract.

Charter personnel shall report violations of this Policy to their Department Vice President, and Human Resources representative, Charter's Corporate Compliance program, Charter's General Counsel, or to their supporting Charter Legal Department attorney. Reports to Ethics Line may be made anonymously.

Charter's *Employee Handbook* and *Open Door Policy* explicitly prohibit retaliation in any form. Charter will not tolerate retaliation, either directly or indirectly, against any individual who in good faith reports a violation of this Policy or participates in the investigation of any such violation. If you suspect or believe that retaliation has occurred, you should immediately report it to your manager, Department Vice President, and Human Resources representative, Charter's Corporate Compliance program (via Ethics Line), Charter's General Counsel, or to your supporting Charter Legal Department attorney. Reports to Ethics Line may be made anonymously. Charter will seriously address all reports. Reports made to Charter may be disclosed to the Government. Charter personnel are required to cooperate in any investigations related to potential violations of this Policy.

Employees who register a complaint or concern under this Policy are still subject to normal employment practices and may be disciplined, demoted or discharged for reasons unrelated to their complaint or concern. Nothing in this Policy abrogates the at-will employment relationship between Charter and employees.

### **4.0 ENFORCEMENT**

Violations of this Policy or any of its provisions may result in appropriate corrective action, up to and including termination of employment.

## 5.0 CONTACTS

Questions about this Policy should be referred to your supporting Charter Legal Department attorney or your human resources representative. Additional information about Charter's Compliance program may be found in the *Corporate Compliance* section of Panorama (Company Intranet).

Charter's Open Door process encourages employees to address questions and concerns with their direct manager, leadership team member, and/or Human Resources. Employees and non-employees may also report compliance and ethics concerns via Charter's [Ethics Line](#) by clicking the link or calling 1-800-495-0068.