

OPENAI RAISING CONCERNS POLICY

OpenAI believes that open communication is essential to a successful work environment and that all employees should feel free to raise issues of concern without fear of reprisal. OpenAI believes that channels of communication should be kept open and flexible. OpenAI is also committed to acting with honesty and integrity in our duties and responsibilities, and all OpenAI Personnel¹ are responsible for ensuring we live up to this important goal. By raising concerns, you are helping to advance our mission to build AGI that benefits all humanity.

Here's how you can raise concerns and feel confident in doing so.

Your Responsibility to Raise Concerns regarding Misconduct

OpenAI Personnel have a responsibility to speak up if they suspect or observe misconduct by OpenAI Personnel, vendor, supplier, or other business partner, and to speak up about any other violation of any law or regulation or an OpenAI policy. When in doubt, speak up.

OpenAI managers, as leaders, have a particular responsibility not only to actively spot and raise concerns but also to foster an environment where OpenAI Personnel feel comfortable in raising concerns.

Examples of Potential Concerns

Below is a non-exhaustive list of the kinds of concerns you might raise:

- Financial improprieties: questionable financial practices, including misuse of OpenAI assets, the circumvention or attempted circumvention of accounting procedures or internal controls; accounting or audit matters;
- Security: misuse of OpenAI's systems, leaks, misappropriation of OpenAI data;
- Privacy: misuse, abuse, or improper handling of personal information or customer data;
- AI safety: violations of laws, regulation, or company policies related to the safe development, testing, or use of AI;
- Ethical violations or illegal or improper practices: fraud, theft, embezzlement, bribery or kickbacks;
- Employment: sexual harassment or discrimination;
- Retaliation for raising concerns in good faith or participating in an internal investigation;

¹ OpenAI officers, employees, and extended workers.

- Violations of OpenAI’s Conflict of Interest Policy; or
- Other violations of law, regulation, or OpenAI policies.

No Retaliation for Raising Concerns in Good Faith

OpenAI does not tolerate harassment or retaliation against anyone who raises a concern in good faith, no matter who is involved and even if the concern later turns out to be unsubstantiated. Likewise, the Company does not permit harassment or retaliation for participating in a review or investigation of concerns under this Policy. Personnel who engage in such harassment or retaliatory conduct will be subject to discipline up to and including termination of employment.

OpenAI does not prohibit anyone from electing to report concerns to, file a charge or complaint with, make lawful disclosures to, provide documents or other information to, participate in an investigation or hearing conducted by or communicate with the US Equal Employment Opportunity Commission (“EEOC”), US National Labor Relations Board (“NLRB”), US Securities and Exchange Commission (“SEC”) or any other national, federal, state or local agency charged with the enforcement of any laws or regulations.

How to Raise Concerns

You should raise your concerns in the manner that is most comfortable to you. For example, you may report a concern through:

- **Your manager:** OpenAI has an open door policy. Any employee is entitled to meet with their manager to raise concerns.
- **HR:** The OpenAI Employee Relations team can be reached via [employeerelations@](mailto:employeerelations@openai.com). You can also reach out to your organization’s HR business partner ([go/HRBP](#)).
- **Legal:** You can reach out to any member of the legal team to report misconduct, including violations of law, regulations, or OpenAI policy. You may also reach out to raise concerns to Legal via [concerns@](mailto:concerns@openai.com).
- **OpenAI’s Integrity Line:** You may raise concerns, including on an anonymous basis, via our Integrity Line 24 hours a day at <http://openai.integrityline.com>.

Confidential Reporting

We take seriously all concerns raised, and we handle them with appropriate discretion. Your concerns will be treated confidentially, to the extent possible, in order to properly

review the issues raised. If you raise concerns via our Integrity Line, you may also raise those concerns anonymously.

OpenAI Personnel are prohibited from seeking out the identity of an individual who chooses to raise concerns anonymously via our Integrity Line.

How We Address Concerns

How we address concerns depends on the nature of the concerns raised.

- **Reports of alleged misconduct.** The Company has dedicated functions whose responsibilities include intake, review, investigation, and oversight of reported concerns involving violations of law, regulation, or OpenAI's Employee Handbook. OpenAI is committed to a fair, accurate, and timely investigation process. The Company also follows a process for escalation of certain categories of concerns directly to the Audit Committee of the Board of Directors.
- **Concerns about business or policy decisions.** For concerns that relate to business or policy choices the company has made, including the company's strategic priorities, research and product roadmap or launches, general direction, and other grievances that do *not* involve reports of alleged misconduct (described above), concerns should be referred to the appropriate teams who have responsibility for oversight and management of the subject matter.

In all cases, concerns raised will be reviewed and remedial actions will be taken as appropriate. While we provide employees with this opportunity to raise general concerns, please understand that not every complaint may be resolved to the employee's satisfaction.

We ask that you not conduct your own review or investigation, as doing so may compromise OpenAI's ability to properly review, investigate, and remediate. If you provide your name and contact information when reporting your concern, you may be provided with feedback on the results, as appropriate and on a case-by-case basis.

Questions about this Policy?

Please reach out to the Legal team (concerns@).