

# ANTHROPIC

## RSP Noncompliance Reporting and Anti-Retaliation Policy

### Table of Contents

|                                                       |   |
|-------------------------------------------------------|---|
| Purpose.....                                          | 2 |
| Scope.....                                            | 2 |
| Roles and Responsibilities.....                       | 2 |
| What Can be Reported.....                             | 3 |
| Procedure for Submitting Confidential Complaints..... | 4 |
| Reporting Channels.....                               | 4 |
| Confidentiality Protections.....                      | 4 |
| Report Content & Documentation.....                   | 4 |
| Investigation Process.....                            | 5 |
| Case Management & Reporting.....                      | 5 |
| Anti-Retaliation Policy.....                          | 5 |
| Compliance.....                                       | 6 |
| Exceptions.....                                       | 6 |
| Violations & Enforcement.....                         | 6 |
| Document History.....                                 | 6 |



### Purpose

Anthropic is committed to complying with our Responsible Scaling Policy ("RSP"). This policy establishes a mechanism for reporting potential RSP noncompliance and protects individuals who make good-faith reports from retaliation.

### Scope

Below is the process by which employees may report concerns about RSP noncompliance and what they can expect during the process. The Company will not tolerate harassment, retaliation, or reprisals of any kind against any employee who has, in good faith, protested or raised a concern regarding a company policy or practice that does not comply with the RSP or reported a reasonable suspicion that someone connected with Anthropic has engaged in conduct that does not comply with the RSP.

While this policy is specifically written for Anthropic employees and Board members, we expect members of our extended workforce (including, but not limited to, vendors and independent contractors) and others who may be temporarily assigned to perform work or services for Anthropic to be apprised of the RSP. To this end, we encourage such individuals to report concerns regarding RSP noncompliance. Anthropic will take seriously all conversations, calls, and reports made in good faith under this policy.

### Roles and Responsibilities

The successful implementation of this policy requires collaboration and commitment from various roles across the organization. These are the unique responsibilities beyond our standard requirements for ensuring success of this policy.

| Role                        | Responsibilities                                                                                                                                                   |
|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Responsible Scaling Officer | <ul style="list-style-type: none"><li>• Receive and investigate reports of RSP noncompliance</li><li>• Maintain confidentiality of reports and reporters</li></ul> |



| Role                             | Responsibilities                                                                                                                                                                                                                                                                                                       |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                  | <ul style="list-style-type: none"><li>• Ensure timely Board reporting of noncompliance reports as required by RSP</li></ul>                                                                                                                                                                                            |
| Managers                         | <ul style="list-style-type: none"><li>• Create an environment where Anthropic personnel feel safe to report concerns</li><li>• Never engage in or tolerate retaliation against reporters</li></ul>                                                                                                                     |
| Employees and Contingent Workers | <ul style="list-style-type: none"><li>• Report suspected RSP noncompliance through appropriate channels</li><li>• Provide detailed information when submitting concerns</li></ul>                                                                                                                                      |
| Legal Team                       | <ul style="list-style-type: none"><li>• Support policy interpretation and implementation</li><li>• Assist in policy compliance monitoring</li></ul>                                                                                                                                                                    |
| People Team                      | <ul style="list-style-type: none"><li>• Support managers and employees in understanding this policy</li><li>• Handle reports of retaliation related to RSP noncompliance reporting</li><li>• Coordinate with the RSO on related employee matters</li><li>• Maintain confidentiality of sensitive information</li></ul> |

### What Can be Reported

This policy and process applies to employees who raise good-faith concerns relating to RSP noncompliance only. This policy is not intended to address every concern that may arise in the workplace. Employees should be aware that Anthropic has other policies and procedures and available channels of communication for reporting certain concerns that may not be covered by this policy and/or that may be more appropriate mechanisms for addressing such concerns, including those mandated by Anthropic's anti-discrimination and harassment policies, or policies for suspected fraud or violation of regulations. When appropriate or legally required, some issues initially received through the RSP policy reporting mechanism may be investigated and remedied in a manner that is more consistent with the specific procedure applicable to that policy. If you are not clear about which channel to use, please check-in with your manager or HRBP. Please also note that confidentiality and anonymity can only be guaranteed for RSP noncompliance concerns shared within the Navex reporting tool.

## Procedure for Submitting Confidential Anonymous Complaints

### Reporting Channels

Employees may submit concerns and information regarding RSP noncompliance to the Responsible Scaling Officer (“RSO”) (or delegate) via [go/report](#). Our Safety & Compliance Report Hotline is powered by Navex EthicsPoint, our trusted third-party partner. Access via:

- Web Intake Site: [anthropic.ethicspoint.com](https://anthropic.ethicspoint.com)
- Mobile Intake Site: [anthropicmobile.ethicspoint.com](https://anthropicmobile.ethicspoint.com)
- Call toll-free: 1-833-761-5790 (United States)
  - Belgium: 0800 27 157
  - Canada: 833-761-5791
  - France: 0 801 13 08 93
  - Ireland: 1800456773
  - Japan: 0800-500-8854
  - Korea, Republic of South: 00744898
  - Netherlands: 0800 0221715
  - Switzerland: 0800 040 032
  - United Kingdom: 0808 164 4376
  - United States: 1-833-761-5790

If a concern relates to conduct by the RSO, the report will be sent instead to the President for review.

### Confidentiality Protections

The reporting system is designed to protect reporter confidentiality. Anthropic cannot unmask the identity of any reporter. The system allows anonymous



correspondence with the RSO (or delegate) about reports throughout the investigation.

### Report Content & Documentation

When submitting a concern, employees should provide as much detailed information as possible, including background, history, names, dates, places, and the specific RSP violation suspected. While comprehensive information aids investigation, sensitive code or protected technical details should not be included in reports.

All conversations, calls, and reports made in good faith under this policy will be taken seriously. Since the system is designed to protect the identities of employees, the integrity of this system depends on employees following this policy in good faith and not filing reports that are intentionally false or those they know do not involve conduct related to noncompliance with the RSP.

### Investigation Process

The RSP Operations Lead or Legal Counsel will act as Navex Case Manager to initiate the review and response process for any noncompliance reports, gathering relevant background information if needed before referring them to the RSO (or President, as applicable) for review and dispositioning. The RSO (or the President, as applicable) will determine appropriate initial inquiries to decide whether an investigation is necessary and, if so, its form and scope. An investigation does not suggest that the concerns have been confirmed or rejected. The nature and severity of the concern will determine the RSO's actions during any investigation.

### Case Management & Reporting

All case reports submitted through the [report form](#) are maintained on a secure third-party reporting platform, accessible only to the Navex Case Manager, RSO, President (if applicable), and any authorized delegates. The RSO cannot access reporter identity unless the reporter chooses to attach their name to the report.



The RSO provides periodic updates to the board regarding all RSP noncompliance cases and developments.

### **Anti-Retaliation Policy**

Anthropic encourages employees to come forward with concerns and will not tolerate retaliation or harassment against employees who raise a good-faith concern under this policy. Employees who believe that they have been subjected to any conduct that violates the non-retaliation policy should reach out to their manager or HRBP. Any employee who retaliates against another employee as a result of raising a concern under this policy may be subject to corrective action including termination of employment.

### **External Reporting**

While we encourage internal reporting and we hope you'll come to us first, nothing in this policy or any other Anthropic agreement or policy prohibits you from reporting potential violations of law to appropriate government authorities without Anthropic's authorization and without retaliation.

When reporting concerns externally, employees should make every effort to avoid unnecessarily disclosing confidential information. Focus on communicating the nature of the concern without publicly revealing specific technical details, HIPI trade secrets, or proprietary information.

### **Our No Retaliation Policy**

Anthropic prohibits retaliation against those who, in good faith, engage in a protected activity.

A "good faith" report means that you have a reasonable belief that your allegation could be true and the report is not being made with malicious intent. It does not mean that you must know with certainty that an allegation is true.

### **What is a Protected Activity?**



A protected activity is any action taken that is protected by law against retaliation. Protected activities include, but are not limited to:

- Reporting or raising concerns in good faith through internal channels about known or suspected violations of the RSP
- Participating in an internal investigation
- Refusing to engage in activities you reasonably believe to be in violation of the RSP
- Acting as a whistleblower by reporting concerns in good faith to statutorily authorized government authorities or regulatory agencies

### **What is Retaliation?**

Retaliation is any adverse action taken against an employee because they reported a problem, refused to engage in unlawful activity, or participated in an investigation. Retaliation is not always obvious. It can include:

- Job loss, pay cuts or reduced hours
- Denying overtime, promotion, or benefits
- Limiting career growth (e.g. keeping you out of important meetings or reassigning projects)
- Disciplinary actions
- Failing to hire, or telling other prospective employers not to hire you
- Intimidation or making threats
- More subtle actions, such as isolating, ostracizing, mocking, or falsely accusing you of poor performance
- Hindering any earned benefits

### **Compliance**

Anthropic will measure and verify compliance to this policy through various methods, including but not limited to ongoing monitoring, and both internal and external reviews.

## Exceptions

Requests for an exception to this policy must be submitted via the [Policy Exception Form](#) for approval.

## Violations & Enforcement

Any known violations of this policy should be reported to the Policy Owner, Executive Sponsor, or other appropriate members of Anthropic's Senior Leadership through the appropriate [reporting channels](#). Violations can result in immediate withdrawal or suspension of system and network privileges and/or disciplinary action in accordance with company procedures including termination of employment.