

PROCEDURES FOR HANDLING REPORTS TO ICANN'S ANONYMOUS HOTLINE

The Internet Corporation for Assigned Names and Numbers (ICANN) utilizes [Redacted-Confident a] to administer ICANN's Anonymous Hotline. Upon receipt of a report, [Redacted Confidential] shall simultaneously notify via email ICANN's Chief Operating Officer, ICANN's General Counsel and Secretary, ICANN's Deputy General Counsel responsible for employment matters, and ICANN's Director of Human Resources ("Hotline Committee"). The [Redacted Confidential] notification will include sufficient information to assist the Hotline Committee in determining if the matter is urgent.

When the Hotline Committee receives a report, the following procedures will be observed, in addition to those outlined in the Anonymous Hotline Policy found on the ICANN internal staff wiki:

- 1) If the report deals with a matter that is considered urgent (e.g. detrimental to ICANN if not dealt with immediately), the Hotline Committee will convene no later than 24 hours, but strive to convene within four hours if possible, of receiving the report to: (i) review the report; (ii) determine an appropriate course of action, which might include posing questions to the reporting party through [Redacted Confidential]; and (iii) assign responsibilities for conducting an investigation, if warranted under the circumstances.
- 2) If the report deals with a matter that is not considered urgent, the Hotline Committee will convene no later than seven calendar days of receiving the report to: (i) review the report; (ii) determine an appropriate course of action, which might include posing questions to the reporting party through [Redacted Confidential]; and (iii) assign responsibilities for conducting an investigation, if warranted under the circumstances.
- 3) If the Hotline Committee determines that additional information is needed from the reporting party to conduct a full and thorough investigation, the Hotline Committee will provide [Redacted Confidential] with questions to ask the reporting party on behalf of ICANN. Upon receipt of responses to those questions, the Hotline Committee will reconvene to determine next steps, including whether an investigation is warranted.
- 4) [Redacted Confidential] will notify all Hotline Committee members if any member of the Hotline Committee provides questions to [Redacted Confidential] to ask the reporting party. The notification will include the questions that were posed and the name of the Hotline Committee member that posed the questions. Absent objection from any other Hotline Committee member, within four hours of the notification, [Redacted Confidential] will pose the questions to the reporting party and will subsequently provide all responses from the reporting party (anonymously if the reporting party so elects) to all Hotline Committee members.
- 5) If the Hotline Committee identifies one (or more) of its member(s) as being involved in the reported activity, one of the other Hotline Committee members shall notify [Redacted Confidential], copying the other members not involved in the matter, that the involved member shall be excluded from any further [Redacted Confidential] communications until otherwise notified.
- 6) Based on the report (and any subsequent responses received from the reporting party), the Hotline Committee will determine if an investigation is warranted. If an investigation is to be conducted, the Hotline Committee will assign responsibilities. The Committee will determine if

other ICANN executives or the Board of Directors need to be notified of the investigation.

- 7) During an investigation, the investigator(s) may wish to ask questions of the reporting party. If so, numbers 3 through 5 above would apply to the investigative process.
- 8) The results of any investigation will be documented and maintained confidentially. The results may be reported to various ICANN executives as appropriate, and may be reported to the Board of Directors as appropriate.
- 9) The Hotline Committee will notify the appropriate members of ICANN management if the investigation results in a determination that action should be taken to address the circumstances identified in the report.