

ICANN
Policies
Pages: 9

Version 2.0 (Oct 2016)

SUBJECT: Reporting of Work-Related Concerns to the Organizations’s Anonymous Hotline (“Anonymous Hotline Policy”)

SCOPE: Organization Wide

1. PURPOSE:

The Organization is committed to the highest possible standards of ethical, moral and legal business conduct. Organization policies, including those entitled “Open Door,” “Prohibition of Harassment,” and “Fraud,” provide employees, contractors and consultants (collectively for purposes of this policy only, employees, contractors and consultants shall be referred to as “staff members”) with procedures for reporting work-related concerns.

2. POLICY/PROCEDURE:

A. POLICY

This policy explains the Organization’s Anonymous Hotline and how to use it. The Organization’s policies provide a number of ways for staff members to report work-related concerns. A staff member who seeks to report a work-related concern should review the Organization’s policies to determine if there is a specific policy regarding the reporting of concerns pertaining to that subject matter. For example, employment-related concerns should continue to be reported through specified channels such as a staff member’s supervisor, or Global Human Resources.

If a staff member feels uncomfortable about raising an issue directly with his or her manager, HR representative or other member of management, the Organization has created an additional resource – the Anonymous Hotline (“Hotline”).

The Hotline is intended for concerns that could have a significant impact on the Organization’s operations. Such issues would include, but are not limited to, those which:

- could lead to incorrect financial reporting;
- are unlawful;

- are inconsistent with an Organization policy; or
- otherwise amount to serious improper conduct.

B. PROCEDURES

(i) Reporting:

Lighthouse Services (“Lighthouse” or “Hotline Service Provider”) administers the Hotline. Staff members who seek to use the Hotline may do so by contacting the Hotline Service Provider in any of the following ways:

- By telephone:
 - Staff inside of North America
 - United States or Canada – 800-398-1496
 - Mexico – 01-800-681-5340
 - Staff outside of North America – 800-603-2869
 - International calls: See International Toll Free Access List attached as Addendum 1 (see Page 7-9 below).
- By email: reports@lighthouse-services.com
 - *Must Include Company Name With Report
- By facsimile for written documents: 215-689-3885
 - *Must Include Company Name With Report
- By Web: <http://www.lighthouse-services.com/icann>

Callers to the Hotline may elect to make their report anonymously. Hotline reports are submitted by the Hotline Service Provider to the Organization, and may or may not be investigated, at the discretion of the Organization following evaluation of the report received. Investigations may be internal or external, and may be performed by members of the Organization or third parties. A reporting staff member’s anonymity will be protected to the extent permitted by law, but staff members should be aware that an investigation may result in their identity being unintentionally revealed in the course of that investigation.

Although a staff member making a report is not expected to prove the truth of an allegation, he/she will be required to demonstrate to the Hotline operator that there are sufficient grounds for concern. Staff members making a complaint to the Hotline should be prepared to provide specific information regarding the stated concern, including names, dates and specific facts regarding the concern.

(ii) Acknowledgment of Receipt of Report

A representative of the Hotline Committee will acknowledge to the Hotline Service Provider the Committee's receipt of the report as soon as practicable after receipt, and request that the Hotline Service Provider so inform the reporter within 24-48 hours .

(iii) Report handling

The action taken in response to a contact with the Hotline will depend on the nature of the concern expressed. Some concerns may be resolved by agreed action without the need for investigation. Initial inquiries will be made to determine whether an investigation is appropriate and, if so, the form that it should take. Further information may be sought from the complainant. The "Hotline Committee will receive a report of each complaint and a follow-up report on actions taken. Subject to legal constraints, the staff member who contacted the Hotline will receive information about the outcome of the complaint, including any investigation.

The Organization encourages staff members to report in good faith all workplace conduct that they believe violates applicable laws, regulations and/or Organization policy, at the earliest opportunity and in accordance with the procedure set forth above or through the Organization's other complaint reporting mechanisms.

(iv) No retaliation

The Organization prohibits and will not knowingly permit retaliation against any staff member by another staff member or by the Organization for using the Hotline as set forth above, or for assisting or participating in any manner in any investigation or proceeding of any type related to the use of the Hotline. Staff members who feel they have been subjected to any type of retaliation as a result of using the Hotline in good faith, or assisting or participating in any investigation or proceeding relating to the use of the hotline should immediately contact Global Human Resources or the Hotline as provided above.

Any report of retaliation by anyone against a staff member lodging a complaint in accordance with the procedures outlined above will be reasonably, promptly, objectively and thoroughly investigated as appropriate under the circumstances in accordance with the Organization's investigation procedure outlined above. If a complaint of retaliation is substantiated, appropriate disciplinary action will be taken, up to and including termination of employment or engagement.

The Organization reserves the right to modify or amend this Policy and either of the Addendums at any time as it may deem necessary.

BELGIAN ADDENDUM TO ANONYMOUS HOTLINE POLICY

This Belgian Addendum to the Anonymous Hotline Policy applies, in addition to that Policy, to staff members in Belgium, and prevails to the extent of any inconsistency.

In the framework of the Hotline Policy, some of personal information may be collected, saved or otherwise treated. The Act of 8 December 1992 for the protection of privacy as regards the treatment of personal information (the “*Privacy Act*”) has established certain rights for all persons whose personal information may be collected, saved or otherwise treated. The Hotline Policy and this Addendum guarantee these rights.

The Treatment of Personal Information

Lighthouse Services (“Lighthouse” or “Hotline Service Provider”) administers the “Hotline.” Its contact information is available in the Hotline Policy.

Please note that by making a disclosure of information under the Hotline Policy or the Belgian Addendum to the Hotline Policy, you may be providing personal information within the meaning of the *Privacy Act*. By disclosing such information, you agree to allow the person to whom you disclosed the information, the Organization or third parties (as applicable) to collect, use and disclose that information for the purposes of investigating issues related to your disclosure in accordance with this Hotline Policy and the Belgian Addendum to the Hotline Policy, including the transfer of such information outside of the European Union, which in turn may include countries that do not offer the same level of protection of personal information as Belgium.

The Hotline Service Provider and the Organization may also, in the course of an investigation in accordance with this Hotline Policy and the Belgian Addendum to the Hotline Policy, collect and save personal information without your permission. This information may be transferred to Hotline Service Provider, the Organization or third parties (as applicable) outside of the European Union, including to countries that do not offer the same level of protection of personal information as Belgium, in accordance with the provisions of the *Privacy Act*.

The Hotline Service Provider and the Organization will, in the framework of this Hotline Policy and the Belgian Addendum to the Hotline Policy, collect and save only the personal information that is necessary to further the goals stated in the Hotline Policy, and it will delete the information when it is no longer necessary.

The Hotline Service Provider and the Organization will treat all personal information that is collected and saved in the framework of this Hotline Policy and the Belgian Addendum to the Hotline Policy securely and confidentially. It will store this information separately from other information. The Hotline Service Provider and the Organization will use their best efforts to ensure that all collected information is correct and precise.

You have a right to review your personal information that has been collected. If any of this information is incorrect, you have right to have it corrected. If any of this information is saved when it is no longer necessary to do so, you have a right to have it deleted. You can exercise these rights by contacting the Hotline Service Provider.

SINGAPOREAN ADDENDUM TO ANONYMOUS HOTLINE POLICY

This Singaporean Addendum to the Anonymous Hotline Policy applies, in addition to that Policy, to ICANN staff members in Singapore, and prevails to the extent of any inconsistency.

In the framework of the Hotline Policy, personal information may be collected, saved or otherwise treated. The Personal Data Protection Act 2012 (the “PDPA”) regulates the collection, use and disclosure of personal data by organizations. The Hotline Policy and this Addendum adhere to the provisions of the PDPA.

The Treatment of Personal Information

Lighthouse Services administers the ICANN Hotline. Its contact information is available in the Hotline Policy.

Please note that by making a disclosure of information under the Hotline Policy or the Singaporean Addendum to the Hotline Policy, you may be providing personal information within the meaning of the PDPA. By disclosing such information, you agree to allow the person to whom you disclosed the information, ICANN or third parties (as applicable), to collect, use and disclose that information for the purposes of investigating issues related to your disclosure in accordance with this Hotline Policy and the Singaporean Addendum to the Hotline Policy, including the transfer of such information out of Singapore, in accordance with the requirements prescribed under the PDPA.

Lighthouse Services and ICANN may also, in the course of an investigation in accordance with this Hotline Policy and the Singaporean Addendum to the Hotline Policy, collect and save personal information without your permission. This information may be transferred to Lighthouse Services, ICANN or third parties (as applicable) outside of Singapore, in accordance with the requirements prescribed under the PDPA.

Lighthouse Services and ICANN will, in the framework of this Hotline Policy and the Singaporean Addendum to the Hotline Policy, collect and save only the personal information that is necessary to further the goals stated in the Hotline Policy, and it will delete the information when it is no longer necessary.

Lighthouse Services and ICANN will treat all personal information that is collected and saved in the framework of this Hotline Policy and the Singaporean Addendum to the Hotline Policy securely and confidentially. Lighthouse Services and ICANN will use their best efforts to ensure that all collected information is accurate and complete.

You have a right to review your personal information that has been collected. If any of this information is incorrect, you have the right to have it corrected. If any of this information is saved when it is no longer necessary to do so, you have the right to have it deleted. You can exercise these rights by contacting Lighthouse Services.

ADDENDUM 1 - INTERNATIONAL TOLL FREE ACCESS LIST
<https://www.lighthouse-services.com/documentlink/International%20Toll-free%20Hotline%20Access%20Instructions.pdf>



Access Codes

Lighthouse hotline toll-free calling instructions for employees:

1. Make sure you have an outside line.
2. Enter the Access Code for the country and/or the telephone system you are calling from.
3. An English-language voice prompt will ask for the number you are calling.
4. Enter our toll-free number: 800-803-2869. There is no need to dial '1' before the toll-free number. You are now connected to the hotline.
5. A Lighthouse greeting will be played in multiple languages. Make a choice from the prompts or press 0 and tell the English operator the language you speak (preferably in English). An interpreter will then join the call in 2 – 3 minutes. The Lighthouse operator will interview you aided by the interpreter.
6. A report in English is then sent to the designated recipient(s) of your company.
7. Access codes are subject to change.

For employees outside North America only.

Albania 00-800-0010	Bulgaria 00-800-0010	Egypt	Showing Countries Starting with Al-Ho Legends: U.S. - United States MB - Military Bases # - Pound Key SS - Service Suspended Note: ^ indicates that you should wait for a second dial tone before dialing the next number. Calls using these access codes are in English, except where another language is specified.
American Samoa 1-800-225-5288	Cambodia 1-800-881-001	Cairo 2510-0200	
Angola 808-000-011	Canada Direct Toll-Free Available	Outside Cairo 02-2510-0200	
Anguilla 1-800-225-5288	Cayman Islands 1-800-225-5288	El Salvador 800-1785	
Antigua #1	Chile	Estonia 800-12001	
Select Hotels 1-800-225-5288	Telmex 800-225-288	Finland 0-800-11-0015	
Argentina	ENTEL 800-360-311	France	
Telecom 0-800-555-4288	ENTEL (Spanish) 800-360-312	Hotels 1 0-800-99-1011	
Telefonica 0-800-222-1288	Telefonica 800-800-288	Hotels 2 0-800-99-1111	
ALA (Spanish) 0-800-288-5288	Telmex 171-00-311	Hotels 3 0-800-99-1211	
Australia	Telmex (Spanish) 171-00-312	Hotels-Paris Only 0-800-99-0111	
Telstra 1-800-881-011	Easter Island 800-800-311	France Telecom 0-800-99-0011	
Optus 1-800-551-155	Easter Island (Spanish) 800-800-312	Telecom Development 0-805-701-288	
Austria 800-200-288	China	French Antilles	
Bahamas 1-800-872-2881	South, Shanghai - CT 10-811	Guadeloupe 0-800-99-0011	
Bahrain 800-00-001	North, Beijing CNGC 108-888	Martinique 0-800-99-0011	
U.S. MB onboard cell phones 800-000-05	China Telecom (Mandarin) 108-10	St. Barthelemy 0-800-99-0011	
U.S. MB call centers 800-000-00	North, Beijing CNGC (Mandarin) 108-710	St. Martin 0-800-99-0011	
Bangladesh 157-0011	Colombia 01-800-911-0010	French Guiana 0-800-99-0011	
Barbados 1-800-225-5288	(Spanish) 01-800-911-0011	Germany 0-800-225-5288	
Belarus 8 ^A 800-101	Costa Rica 0-800-011-4114	Ghana 020-2424-26-004	
Belgium 0-800-100-10	Croatia 0800-220-111	Gibraltar 8800	
Belize 811	Cyprus 800-900-10	Greece 00-800-1311	
Hotels Only 555	Czech Republic 00-800-222-55288	Grenada 1-800-225-5288	
Benin 102	Denmark 800-100-10	Guam 1-800-225-5288	
Bermuda 1-800-225-5288	Diego Garcia 999-288	Guantanamo Bay U.S. Military Bases 2935	
Bolivia 800-101-110	Dominican Republic 1-800-225-5288	Guatemala	
(Spanish) 800-101-111	1-800-872-2881	English 999-9190	
Brazil	(Spanish) 1-888-225-5288	Spanish 999-9190	
0-800-890-0288	Dominica 1-800-225-5288	Guyana 159	
0-800-888-8288	Ecuador 1-800-225-528	Honduras English 800-0123	
British V.I. 1-800-872-2881	(Spanish) 1-999-119	(Spanish) 800-0123	
Brunei 800-1111			



Access Codes

For employees outside North America only.

Hong Kong	
<i>Hong Kong Telephone</i> 800-96-1111	
<i>New World Telephone</i> 800-93-2266	
Hungary	06-800-011-11
Iceland	00-800-222-552-88
India	000-117
Indonesia	001-801-1Q
Ireland	
	1-800-550-000
	<i>UIFN</i> 00-800-222-55288
Israel	
	<i>Bezeq</i> 1-80-949-4949
	<i>Golden Lines</i> 1-80-922-2222
	<i>Barak</i> 1-80-933-3333
Italy	800-172-444
Ivory Coast	00-111-11
Jamaica	
	1-800-872-2881
	<i>Public Phone #1</i>
Japan	
	<i>KDDI</i> 00-539-111
	<i>Softbank Telecom</i> 00-663-5111
	<i>NTT</i> 0034-811-001
Jordan	1-880-0000
Kazakhstan	8 ^A 800-121-4321
Kenya	0-207-602-020
Korea, Republic	
	<i>Korea Telecom</i> 00-729-11
	<i>U.S. MB Korea Telecom</i> 550-HOME
	<i>ONSE</i> 00-369-11
	<i>Dacom</i> 00-309-11
	<i>U.S. MB Dacom</i> 550-2USA
Latvia	8000-2288
Lebanon	01-426-801

Luxembourg	800-201-11
Macau	0-800-111
Macedonia, F.Y.R	0-800-94288
Malaysia	1-800-80-0011
Malta	800-901-10
Mauritius	01 120
Mexico	<i>Direct Toll-Free Available</i>
Micronesia	288
Monaco	800-90-288
Montserrat	1-800-225-5288
Morocco	002-11-0011
Neth/Antilles	
	001-800-872-2881
Netherlands	0800-022-9111
New Zealand	000-911
Nicaragua	
	1-800-0174
	<i>(Spanish)</i> 1-800-0164
Nigeria	0-708-060-1816
Norway	
	800-190-11
	<i>U.S. Military Bases</i> 800-199-11
Pakistan	00-800-01-001
Panama	
	800-0109
	<i>(Spanish)</i> 800-2288
Paraguay	
	<i>Asuncion City</i> 008-11-800

Peru	
	<i>Telephonica</i> 0-800-50-288
	<i>Americatel</i> 0-800-70-088
	<i>Telephonica (Spanish)</i> 0-800-50-000
Philippines	
	<i>PLDT</i> 1010-5511-00
	<i>PLDT (Tagalog)</i> 1010-5511-10
	<i>2nd Option</i> 105-11
	<i>Globe</i> 105-11
	<i>Globe (Tagalog)</i> 105-12
	<i>Philcom</i> 105-11
	<i>Philcom (Tagalog)</i> 105-12
	<i>Digitel</i> 105-11
	<i>Digitel (Tagalog)</i> 105-12
	<i>Smart</i> 105-11
	<i>Smart (Tagalog)</i> 105-12
	<i>Bayan</i> 105-11
Poland	0-0-800-111-1111
Portugal	800-800-128
Reunion Island	0-800-99-0011
Romania	
	<i>Romtelecom</i> 0808-03-4288
Russia	
	8 ^A 10-800-110-1011
	<i>Moscow</i> 363-2400
	<i>Outside Moscow</i> 8 ^A 495-363-2400
	<i>St. Petersburg</i> 363-2400
	<i>Outside St. Petersburg</i> 8 ^A 812-363-2400
Saipan	1-800-225-5288
San Marino	800-172-444
Saudi Arabia	1-800-10
Senegal	
	800-103-072
Singapore	
	<i>SingTel</i> 800-011-1111
	<i>StarHub</i> 800-001-0001
Slovakia	0-800-000-101
South Africa	800-99-0123

Showing Countries Starting with **Ho-So**

Legends:
U.S. - United States
MB - Military Bases
- Pound Key
SS - Service Suspended

Note:
^A indicates that you should wait for a second dial tone before dialing the next number.

Calls using these access codes are in English, except where another language is specified.



Access Codes

For employees outside North America only.

Spain	900-99-0011	Ukraine	0-800-502-886
Sri Lanka		United Kingdom	
	Colombo 2-430-430		British Telecom 0-800-89-0011
	Outside Colombo 112-430-430		C&W 0-500-89-0011
St. Kitts/Nevis	1-800-225-5288		
St. Lucia	1-800-225-5288	United States	
St. Pierre & Miquelon			Direct Toll-Free Available
	0-800-99-0011		
St. Vincent	1-800-225-5288		
Suriname	156		
Sweden	020-799-111		
Switzerland	0-800-890011		
Taiwan	00-801-102-880		
Thailand	1-800-0001-33		
	001-999-111-11		
Trinidad & Tobago	1-800-872-2881	Uruguay	000-410
		Uzbekistan	
			Tashkent 8 ^A 641-744-0010
Turkey	0-811-288-0001	Venezuela	
Turks & Caicos	1-800-225-5288		0-800-225-5288
U.A.E.	8000-021		(Spanish) 0-800-552-6288
		Vietnam	
	du 8000-555-86		VNPT 1-201-0288
	Military-USO & cellular 8000-051		Viettel 1-288-0288
	Military-USO & cellular 8000-061		

Showing Countries Starting with

Sp-Zi

Legends:

U.S. - United States
 MB - Military Bases
 # - Pound Key
 SS - Service Suspended

Note:

^A indicates that you should wait for a second dial tone before dialing the next number.

Calls using these access codes are in English, except where another language is specified.