

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 | | Estonia 800-12001 | |
| #1 | Chile | Finland 0-800-11-0015 | |
| Select Hotels 1-800-225-5288 | Telmex 800-225-288 | France | |
| Argentina | ENTEL 800-360-311 | Hotels 1 0-800-99-1011 | |
| Telecom 0-800-555-4288 | ENTEL (Spanish) 800-360-312 | Hotels 2 0-800-99-1111 | |
| Telefonica 0-800-222-1288 | Telefonica 800-800-288 | Hotels 3 0-800-99-1211 | |
| ALA (Spanish) 0-800-288-5288 | Telmex 171-00-311 | Hotels-Paris Only 0-800-99-0111 | |
| - | Telmex (Spanish) 171-00-312 | France Telecom 0-800-99-0011 | |
| Australia | Easter Island 800-800-311 | Telecom Development 0-805-701-288 | |
| Telstra 1-800-881-011 | Easter Island (Spanish) 800-800-312 | French Antilles | |
| Optus 1-800-551-155 | China | Guadeloupe 0-800-99-0011 | |
| Austria 800-200-288 | South, Shanghai - CT 10-811 | Martinique 0-800-99-0011 | |
| Bahamas 1-800-872-2881 | North, Beijing CNGC 108-888 | St. Barthelemy 0-800-99-0011 | |
| Bahrain | China Telecom (Mandarin) 108-10 | St. Martin 0-800-99-0011 | |
| 800-00-001 | North, Beijing CNGC (Mandarin) 108-710 | French Guiana 0-800-99-0011 | |
| U.S. MB onboard cell phones 800-000-05 | Colombia | Germany 0-800-225-5288 | |
| U.S. MB call centers 800-000-00 | 01-800-911-0010 | Ghana 020-2424-26-004 | |
| Bangladesh 157-0011 | (Spanish) 01-800-911-0011 | Gibraltar 8800 | |
| Barbados 1-800-225-5288 | Costa Rica 0-800-011-4114 | Greece 00-800-1311 | |
| Belarus 8 ^A 800-101 | Croatia 0800-220-111 | Grenada 1-800-225-5288 | |
| Belgium 0-800-100-10 | Cyprus 800-900-10 | Guam 1-800-225-5288 | |
| Belize | Czech Republic | Guantanamo Bay | |
| 811 | 00-800-222-55288 | U.S. Military Bases 2935 | |
| Hotels Only 555 | Denmark 800-100-10 | Guatemala | |
| Benin 102 | Diego Garcia 999-288 | English 999-9190 | |
| Bermuda 1-800-225-5288 | Dominican Republic | Spanish 999-9190 | |
| Bolivia | 1-800-225-5288 | Guyana 159 | |
| 800-101-110 | 1-800-872-2881 | Honduras English 800-0123 | |
| (Spanish) 800-101-111 | (Spanish) 1-888-225-5288 | (Spanish) 800-0123 | |
| Brazil | Dominica 1-800-225-5288 | | |
| 0-800-890-0288 | Ecuador | | |
| 0-800-888-8288 | 1-800-225-528 | | |
| British V.I. 1-800-872-2881 | (Spanish) 1-999-119 | | |
| Brunei 800-1111 | | | |



Access Codes

For employees outside North America only.

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|--|---------------------------------------|
| 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 |

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|-------------------------|---------------------------------------|
| 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.