

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**

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**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](mailto: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

For employees outside North America only.

### 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: 800-603-2869. 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.

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





For employees outside North America only.

<b>Hong Kong</b>	
<i>Hong Kong Telephone 800-96-1111</i>	
<i>New World Telephone 800-93-2266</i>	
<b>Hungary</b>	06-800-011-11
<b>Iceland</b>	00-800-222-552-88
<b>India</b>	000-117
<b>Indonesia</b>	001-801-10
<b>Ireland</b>	
	1-800-550-000
	<i>UIFN 00-800-222-55288</i>
<b>Israel</b>	
	<i>Bezeq 1-80-949-4949</i>
	<i>Golden Lines 1-80-922-2222</i>
	<i>Barak 1-80-933-3333</i>
<b>Italy</b>	800-172-444
<b>Ivory Coast</b>	00-111-11
<b>Jamaica</b>	
	1-800-872-2881
	<i>Public Phone #1</i>
<b>Japan</b>	
	<i>KDDI 00-539-111</i>
	<i>Softbank Telecom 00-663-5111</i>
	<i>NTT 0034-811-001</i>
<b>Jordan</b>	1-880-0000
<b>Kazakhstan</b>	8 <sup>A</sup> 800-121-4321
<b>Kenya</b>	0-207-602-020
<b>Korea, Republic</b>	
	<i>Korea Telecom 00-729-11</i>
	<i>U.S. MB Korea Telecom 550-HOME</i>
	<i>ONSE 00-369-11</i>
	<i>Dacom 00-309-11</i>
	<i>U.S. MB Dacom 550-2USA</i>
<b>Latvia</b>	8000-2288
<b>Lebanon</b>	01-426-801
<b>Luxembourg</b>	800-201-11
<b>Macao</b>	0-800-111
<b>Macedonia, F.Y.R.</b>	0-800-94288
<b>Malaysia</b>	1-800-80-0011
<b>Malta</b>	800-901-10
<b>Mauritius</b>	01 120
<b>Mexico</b>	<i>Direct Toll-Free Available</i>
<b>Micronesia</b>	288
<b>Monaco</b>	800-90-288
<b>Montserrat</b>	1-800-225-5288
<b>Morocco</b>	002-11-0011
<b>Neth/Antilles</b>	
	001-800-872-2881
<b>Netherlands</b>	0800-022-9111
<b>New Zealand</b>	000-911
<b>Nicaragua</b>	
	1-800-0174
	(Spanish) 1-800-0164
<b>Nigeria</b>	0-708-060-1816
<b>Norway</b>	
	800-190-11
	<i>U.S. Military Bases 800-199-11</i>
<b>Pakistan</b>	00-800-01-001
<b>Panama</b>	
	800-0109
	(Spanish) 800-2288
<b>Paraguay</b>	
	<i>Asuncion City 008-11-800</i>
<b>Peru</b>	
	<i>Telephonica 0-800-50-288</i>
	<i>Americatel 0-800-70-088</i>
	<i>Telephonica (Spanish) 0-800-50-000</i>
<b>Philippines</b>	
	<i>PLDT 1010-5511-00</i>
	<i>PLDT (Tagalog) 1010-5511-10</i>
	<i>2nd Option 105-11</i>
	<i>Globe 105-11</i>
	<i>Globe (Tagalog) 105-12</i>
	<i>Philcom 105-11</i>
	<i>Philcom (Tagalog) 105-12</i>
	<i>Digitel 105-11</i>
	<i>Digitel (Tagalog) 105-12</i>
	<i>Smart 105-11</i>
	<i>Smart (Tagalog) 105-12</i>
	<i>Bayan 105-11</i>
<b>Poland</b>	0-0-800-111-1111
<b>Portugal</b>	800-800-128
<b>Reunion Island</b>	0-800-99-0011
<b>Romania</b>	
	<i>Romtelecom 0808-03-4288</i>
<b>Russia</b>	
	8 <sup>A</sup> 10-800-110-1011
	<i>Moscow 363-2400</i>
	<i>Outside Moscow 8<sup>A</sup>495-363-2400</i>
	<i>St. Petersburg 363-2400</i>
	<i>Outside St. Petersburg 8<sup>A</sup>812-363-2400</i>
<b>Saipan</b>	1-800-225-5288
<b>San Marino</b>	800-172-444
<b>Saudi Arabia</b>	1-800-10
<b>Senegal</b>	
	800-103-072
<b>Singapore</b>	
	<i>SingTel 800-011-1111</i>
	<i>StarHub 800-001-0001</i>
<b>Slovakia</b>	0-800-000-101
<b>South Africa</b>	800-99-0123

**Showing Countries Starting with**  
**Ho-So**

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

**Note:**  
<sup>A</sup> 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.

<b>Spain</b>	900-99-0011	<b>Ukraine</b>	0-800-502-886
<b>Sri Lanka</b>		<b>United Kingdom</b>	
	Colombo 2-430-430		British Telecom 0-800-89-0011
	Outside Colombo 112-430-430		C&W 0-500-89-0011
<b>St. Kitts/Nevis</b>	1-800-225-5288		
<b>St. Lucia</b>	1-800-225-5288	<b>United States</b>	
<b>St. Pierre &amp; Miquelon</b>			Direct Toll-Free Available
	0-800-99-0011		
<b>St. Vincent</b>	1-800-225-5288		
<b>Suriname</b>	156		
<b>Sweden</b>	020-799-111		
<b>Switzerland</b>	0-800-890011		
<b>Taiwan</b>	00-801-102-880		
<b>Thailand</b>	1-800-0001-33		
	001-999-111-11		
<b>Trinidad &amp; Tobago</b>	1-800-872-2881	<b>Uruguay</b>	000-410
		<b>Uzbekistan</b>	
			Tashkent 8 <sup>A</sup> 641-744-0010
<b>Turkey</b>	0-811-288-0001	<b>Venezuela</b>	
<b>Turks &amp; Caicos</b>	1-800-225-5288		0-800-225-5288
<b>U.A.E.</b>	8000-021		(Spanish) 0-800-552-6288
		<b>Vietnam</b>	
	du 8000-555-88		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:**

<sup>A</sup> 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.