

**ICANN  
Policies  
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**SUBJECT: Reporting of Work-  
Related Concerns to the  
Organization’s Anonymous Hotline  
(“Anonymous Hotline Policy”)**

**SCOPE: Organization Wide**

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**1. PURPOSE:**

ICANN is committed to the highest possible standards of ethical, moral and legal business conduct and has a number of policies, including “Open-Door,” “Prohibition of Harassment,” and “Fraud”, that provide employees, contractors and consultants (collectively known as “staff members” for purposes of this policy only) with procedures for reporting work-related concerns. ICANN provides an Anonymous Hotline (“Hotline”) as an additional resource for staff members to report issues, in good faith, regarding unethical, illegal or unsafe activity directly to an independent outside agency staffed with trained professionals who are available 24 hours a day, 7 days a week.

The following defines ICANN’s Hotline Policy which is sometimes referred to as an organization’s “Whistleblower” Policy.

**2. WHEN TO USE THE ANONYMOUS HOTLINE**

ICANN encourages staff members to report in good faith, and at the earliest opportunity, all workplace conduct that they believe may be illegal, unethical, dishonest or violates ICANN Org policy. ICANN prohibits retaliation against staff members who report, in good faith, suspected violations of law, regulations and/or ICANN policy.

Whenever possible, staff members are encouraged to resolve concerns by reporting issues directly with their manager, a Human Resources representative or another member of management with whom they feel comfortable to do so, until matters are satisfactorily resolved.

However, if for any reason a staff member is not comfortable about raising an issue directly with a manager, Human Resources representative or another member of management, ICANN has created an additional resource – the Hotline.

**3. WHAT CAN BE REPORTED**

Staff members may use the Hotline to report any work-related concerns, including, for purposes of illustration and without being limited to, the following:

- Breach of law
- Violation of ICANN policies
- Misuse of funds, theft, embezzlement, or fraud

- Waste of resources, funds or property
- Theft or misuse of information or technology resources
- Falsification of contracts, reports or records
- An actual, potential or perceived conflict of interest
- Unethical behavior
- Safety violations or hazards
- Pressure to do something wrong
- Retaliation for someone bringing forth a concern

#### 4. **PROCEDURES**

##### i. **How to raise issues of concern via the Hotline:**

To ensure staff members can easily and safely raise issues of concern, ICANN uses an independent third-party, [REDACTED] or “Service Provider”), to administer the Hotline.

Staff members who seek to use the Hotline may do so by contacting the Service Provider in any of the following ways:

##### **By telephone:**

###### Staff located in North America

- United States or Canada – [REDACTED]
- Mexico – [REDACTED]

###### Staff located outside of North America

1. Enter the [Access Code](#) for the country and/or the telephone system you are calling from (see international toll-free access list in Addendum 1 of this Hotline Policy).
2. An English-language voice prompt will ask for the number you are calling.
3. Enter the toll-free number: [REDACTED]. There is no need to dial "1" before the toll-free number.
4. A [REDACTED] greeting will be played in multiple languages. Make a choice from the pre-recorded language prompts or press 000 and tell the English-speaking operator the language you wish to speak in. An interpreter will then join the call within 2-3 minutes. The [REDACTED] operator will interview you, aided by the interpreter.

##### **By email:**

- The email address is: [REDACTED]
- You must include ICANN’s name with the report

##### **By facsimile for written documents:**

- Fax number: [REDACTED]
- You must include ICANN’s name with the report

**By Web:**

- [REDACTED]

**ii. Protection of the identify of staff members raising an issue**

Staff members raising an issue to the Hotline may elect to make their report anonymously. Hotline reports are submitted by the Service Provider to ICANN's Hotline, and may or may not be investigated, at the discretion of ICANN following evaluation of the report received. Investigations may be internal or external and may be performed by members of ICANN 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.

**iii. Details required to enable a proper 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.

**iv. Notification & acknowledgement of a report to ICANN**

In line with the Anonymous Hotline procedures, which are posted in weCANN, upon receipt of a report, the Service Provider shall simultaneously notify via email ICANN's General Counsel and Secretary, Deputy General Counsel responsible for employment matters, and Senior Vice President, Global Human Resources (collectively, "Hotline Committee"). A representative of the Hotline Committee will acknowledge to the Service Provider the Committee's receipt of the report as soon as practicable after receipt, and request that the Service Provider so inform the reporter within 24-48 hours.

Upon being notified by the Service Provider, the Hotline Committee will notify the:

- ICANN Board as soon as practicable, of individual Hotline reports which may involve executive management, a serious financial or accounting matter, or any other issue which may seriously damage ICANN's reputation.
- Audit Committee of the ICANN Board, as soon as practicable, of each individual report received via the Hotline, upon being notified by the Service Provider.

v. **Report handling**

The action taken in response to a report 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.

More details on the process can be found in Procedures for handling reports to ICANN's Anonymous Hotline.

vi. **Protection against retaliation**

ICANN prohibits and will not knowingly permit retaliation against any staff member by another staff member or by ICANN 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 ICANN'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.

5. **REVIEW AND AMENDMENTS OF THE HOTLINE POLICY**

The Hotline Policy will be reviewed periodically, at least once every three (3) years, to ensure that it remain relevant and effective.

ICANN reserves the right to modify or amend the Hotline Policy, and either of the Addendum at any time as it may deem necessary.

## II. BELGIAN ADDENDUM TO ANONYMOUS HOTLINE POLICY

This Addendum applies, in addition to the 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.

 or the “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, 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 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 Service Provider and ICANN 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 the Service Provider, ICANN 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 Service Provider and ICANN 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 Service Provider and ICANN 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 Service Provider and ICANN 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 Service Provider.

### III. SINGAPOREAN ADDENDUM TO ANONYMOUS HOTLINE POLICY

This Addendum applies, in addition to the 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.

██████████ 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.

██████████ 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 ██████████, ICANN or third parties (as applicable) outside of Singapore, in accordance with the requirements prescribed under the PDPA.

██████████ 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.

██████████ 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. ██████████ 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 ██████████.

#### IV. TURKISH ADDENDUM TO ANONYMOUS HOTLINE POLICY

This Turkish Addendum to the Anonymous Hotline Policy applies, in addition to that Policy, to ICANN staff members in Turkey, 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 Law on the Protection of Personal Data (the “Data Protection Law”) regulates the collection, use and disclosure of personal data by organizations. The Hotline Policy and this Addendum adhere to the provisions of the Data Protection Law.

██████████ 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 Turkish Addendum to the Hotline Policy, you may be providing personal information within the meaning of the Data Protection Law. 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 Turkish Addendum to the Hotline Policy, including the transfer of such information out of Turkey, in accordance with the requirements prescribed under the Data Protection Law.

██████████ and ICANN may also, in the course of an investigation in accordance with this Hotline Policy and the Turkish Addendum to the Hotline Policy, collect and save personal information without your permission. This information may be transferred to ██████████, ICANN or third parties (as applicable) outside of Turkey, in accordance with the requirements prescribed under the Data Protection Law.

██████████ and ICANN will, in the framework of this Hotline Policy and the Turkish 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.

██████████ and ICANN will treat all personal information that is collected and saved in the framework of this Hotline Policy and the Turkish Addendum to the Hotline Policy securely and confidentially. ██████████ 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 ██████████.

## V. SWISS ADDENDUM TO ANONYMOUS HOTLINE POLICY

This Swiss Addendum to the Anonymous Hotline Policy applies, in addition to that Policy, to ICANN staff members in Switzerland, 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 Federal Data Protection Act (the “DPA”) regulates the collection, use and disclosure of personal data by organizations. The Hotline Policy and this Addendum adhere to the provisions of the DPA.

██████████ 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 Swiss Addendum to the Hotline Policy, you may be providing personal information within the meaning of the DPA. 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 Swiss Addendum to the Hotline Policy, including the transfer of such information out of Switzerland, in accordance with the requirements prescribed under the DPA.

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

██████████ and ICANN will, in the framework of this Hotline Policy and the Swiss 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.

██████████ and ICANN will treat all personal information that is collected and saved in the framework of this Hotline Policy and the Swiss Addendum to the Hotline Policy securely and confidentially. ██████████ 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 ██████████