

Seven pitfalls to **avoid** when implementing a whistleblowing system ...**and best practices**

The Do's & Don'ts - Practical implementation advice for your whistleblowing system

A conversation on common pitfalls and best practices

Dentons' Whistleblowing Line - our strategic alliance with People Intouch

A solution **tailored to your needs** and your Compliance policies.

Protection of **independence, anonymity and confidentiality.**

Advanced technology and **maximum security** (ISAE3000 Type II, based on ISO 27001 & 27002).

Attorney-client privilege or secrecy in accordance with local applicable laws.

First-class **technical and legal support** during all the cycle; from design of the system to the managements and resolution of cases reported.

Continuous and professional monitoring of the hotline.

Our presenters



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Agenda

A conversation around seven common pitfalls and best practices

Whistleblowing: Why?

- Human nature, human approach
- Complying with the law
- SpeakUp Program as early warning system
- No whistleblower = ultimate whistleblower protection
- Protecting your employees and your company

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**Success starts with the
right choice of words and
message**





Make it easy! Balancing the interests of a reporter and your own business

Reporter

- Don't scare them off!
 - Asking them to differentiate the case
 - Too many alternative channels



Organization

- Recipients' role to verify
- Role of the compliance department





Refusal to admit anonymous reporting or lack of facilitation

- Take aways from key messages around anonymous reporting
- A solutions focus can make all the difference!
- Market insight
- Key areas that can be impacted by your approach





The impact of a headquarter centric approach

It's hard to ensure compliance across all jurisdictions in regards to data and labour laws.

Let's apply a one size fits all approach!

My company operates on three continents in 20 jurisdictions, can't we apply the rules of our HQ country?

How can I ensure compliance with relevant data privacy and labour laws?

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Poor communication of channels

- The Board doesn't like it and doesn't endorse the program
- Lack of easy-to-understand information
- Channels are referred to with different names.





Clear communication

SKANSKA

Be Code of Conduct aware



The Skanska Code of Conduct defines how every person throughout our organization, in every part of the world, should work and behave.

Our intentions are clear. We do not tolerate corruption, bribery, unfair anti-competitive activities, discrimination or harassment of any kind.

As a Skanska employee, you are obliged to act if you are aware of serious breaches to the Code of Conduct. By doing so, you help protect our business and our brand.

We realize reporting an ethical breach is not easy. You must feel safe. Please consider the different options.

Also note that making a false accusation is in itself considered a breach to our Code of Conduct.

Johan Karlström
President and CEO

If you believe there is a serious breach to our Code of Conduct:



Talk to your manager, or your manager's manager.
If you don't feel comfortable doing this...



Talk to your Legal department, Human Resources department, Ethics Committee, or call the US Ethics Hotline. Phone: 877-516-3385
If you don't feel comfortable doing this...



Contact Skanska's Code of Conduct Hotline by phone or web.
From the US, dial: 866-250-6706
www.speakupfeedback.eu/
Access Code:

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Taking information home



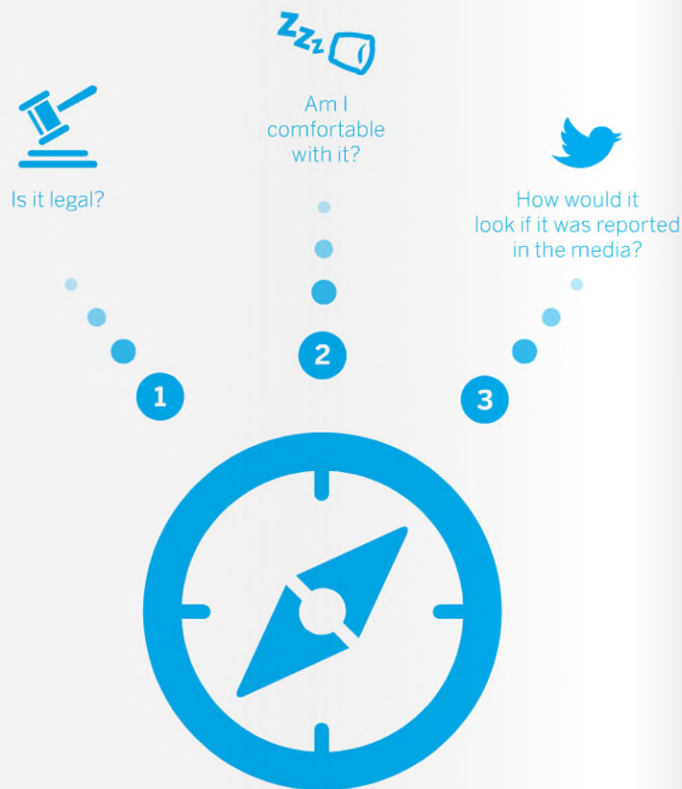
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Positive approach



Moral compass

Don't hesitate to seek guidance. If you are not sure about an action or a decision, ask yourself:



How to report a suspected violation of the Code of Conduct?

As Elekta employees we are expected to report any conduct we believe in good faith to be a violation of the Code of Conduct or the law. By reporting compliance concerns we are acting in the spirit of our Code and helping to protect our business and our reputation.

If we have compliance concerns, it is generally best to talk to our manager about it face to face. We can also report our concerns anytime with a manager of higher rank, Human Resources or to Elekta Compliance, depending on the nature of the concern.

It is not easy reporting a suspected breach of the Code and we must feel comfortable raising concerns with no fear of retaliation.

Elekta managers are expected to emphasize the value of reporting potential compliance concerns promptly and foster an environment of open reporting. Elekta does not tolerate any retaliation against any employee who raises a compliance concern in good faith.

Q&A

Q: I have a concern about the actions of a colleague. How should I report this?

A: The most important thing is to raise your concern – it does not matter which route you choose. If you feel comfortable talking to your manager, do that. Your manager is there to support and help you choose the correct course of action.

Q: What is the Elekta Integrity Line and can I remain anonymous when I use it?

A: The Elekta Integrity Line is a worldwide interactive voice response phone and web-based reporting system available 24 hours a day and operated by an external provider. As explained in the Reporting Violations Policy, employees may anonymously report misconduct and, after receiving the report, we can engage in a virtual communication cycle with the employee where anonymity is guaranteed.

Speak up if you believe that someone has done, is doing, or may be about to do something that violates Elekta's Code of Conduct.

If you believe there has been a violation of the Code of Conduct:

- 1 Talk to your manager, or your manager's manager.
or
If you don't feel comfortable doing this...
- 2 Talk to your Human Resources department or Elekta Compliance
E-mail: compliance@elekta.com
or
If you don't feel comfortable doing this and you believe there has been a serious breach of our Code of Conduct...
- 3 Report your concerns and engage in virtual communication with Elekta Compliance via the Elekta Integrity Line, available 24 hours a day. Full contact details are found in the Reporting Violations Policy.



Quick tips

Communicating the legal
requirements

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Effective report handling

- Is the channel secure?
- Are others in the organization precluded from accessing it?
- One mishandled report and nobody will trust the tool again.
- The entire company which need to develop the right culture.
- The right team handling reports.





Employee rights



Measure and learn!

Analyze statistics.

Monitor awareness.

Share results.

Volume

2.2/1000

On average, 2.2 out of 1000 employees made a report via SpeakUp®.



< 1000 employees

4.7 /
1000



1000-5000 employees

2.3 /
1000



> 5000 employees

1,7 /
1000

Source

2019

26.2 %



73.8%



North America

53,9%

46,1%



Europe

18,4%

81,6%



Asia

16,9%

83,1%



South America

40,2%

59,8%



Africa

9,3%

90,7%



Oceania

30,1%

69,9%



Recap on the seven pitfalls

- 1. The success starts with the choice of the right words and message**
- 2. Make it easy!**
- 3. Refusal to admit anonymous reporting or lack of facilitation**
- 4. Following the “headquarter-centric” approach - Failure to comply with the data protection and labour laws of different jurisdictions**
- 5. Poor communication of whistleblowing channels**
- 6. Handle reports properly**
- 7. Measure & Learn**

Status of the implementation of the Whistleblowing Directive



**Questions from our
audience?**

Dentons' Whistleblowing Line and Suite of Solutions

Thank you for attending