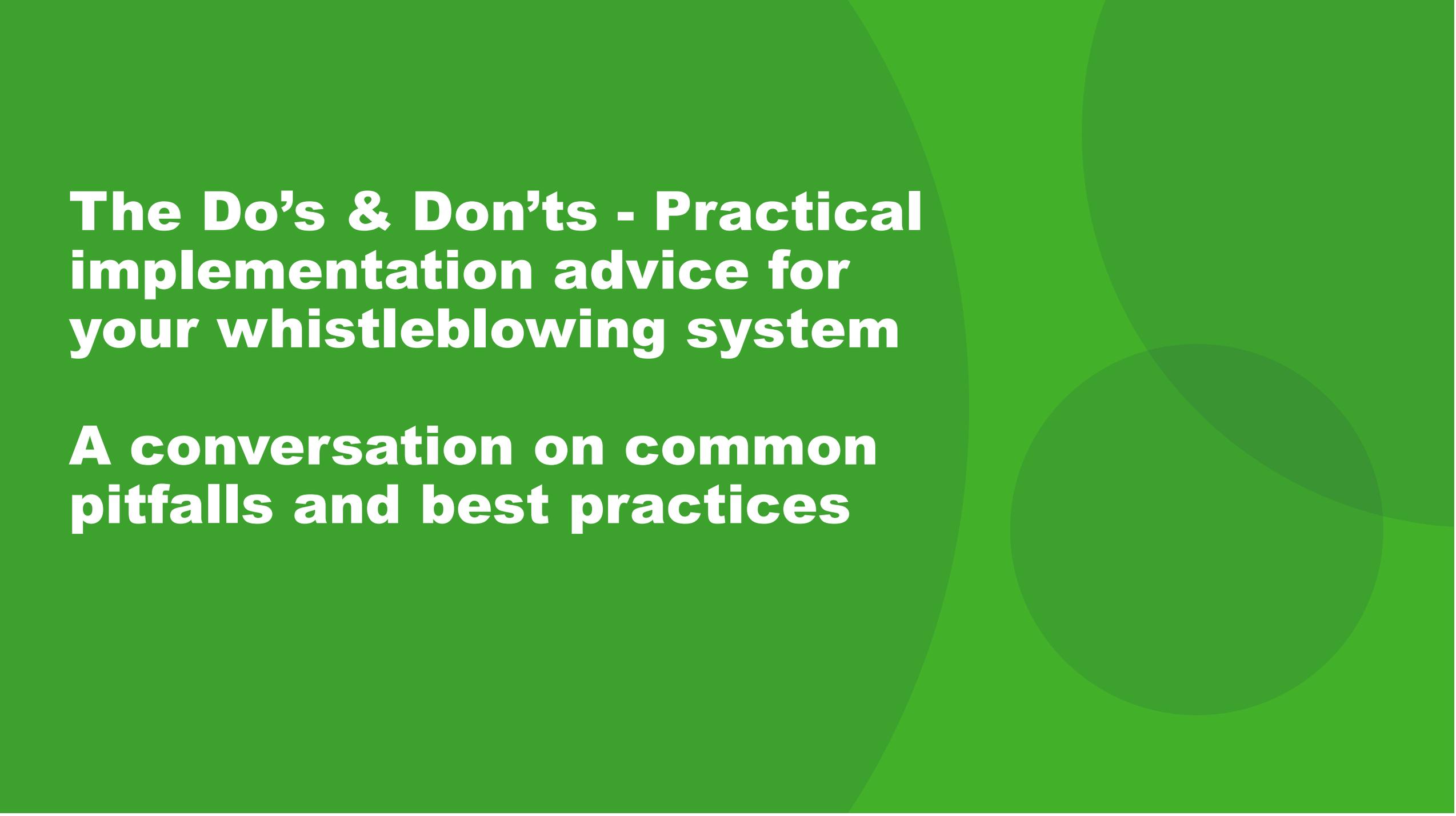


# Seven pitfalls to **avoid** when implementing a whistleblowing system ...**and best practices**

The background is a solid green color with several overlapping, semi-transparent circles of varying shades of green, creating a modern, abstract design.

# **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



Evita Slijper Sips  
Board Member  
People Intouch  
Amsterdam



Ruben Luteijn  
SpeakUp Consultant  
People Intouch  
Amsterdam

Michelle Lamb  
Partner,  
Dentons  
Milton Keynes

Christian Schefold  
Co-Head of  
Germany Compliance,  
Dentons  
Berlin

Diego Pol  
Partner, Co-Head of  
Europe Compliance  
Dentons  
Barcelona



# **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

1

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



2

# 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?

5

## 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.



# 5

## 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.

A handwritten signature in black ink, appearing to read 'Johan Karlström'.

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/](http://www.speakupfeedback.eu/)   
Access Code:

5

## Taking information home



5

# Positive approach



BMW GROUP SPEAKUP LINE.

## FAIRPLAY.

Let us know if someone isn't playing by the rules. You can report misconduct in several languages free of charge - by calling us or entering a text message. Your information will be treated as strictly confidential.

**BMW Group SpeakUP Line**  
0800  
[www.speakupfeedback.eu/web/trust/gb](http://www.speakupfeedback.eu/web/trust/gb)  
Access code:

BMW Group Compliance Committee Office.

BMW GROUP   Rolls-Royce



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## **Quick tips**

Communicating the legal requirements

# 6

## 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.



The image features a background with a color gradient from purple on the left to blue on the right. Three large, semi-transparent circles in shades of blue and purple overlap each other. The text "Employee rights" is centered within the largest circle on the left.

**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%



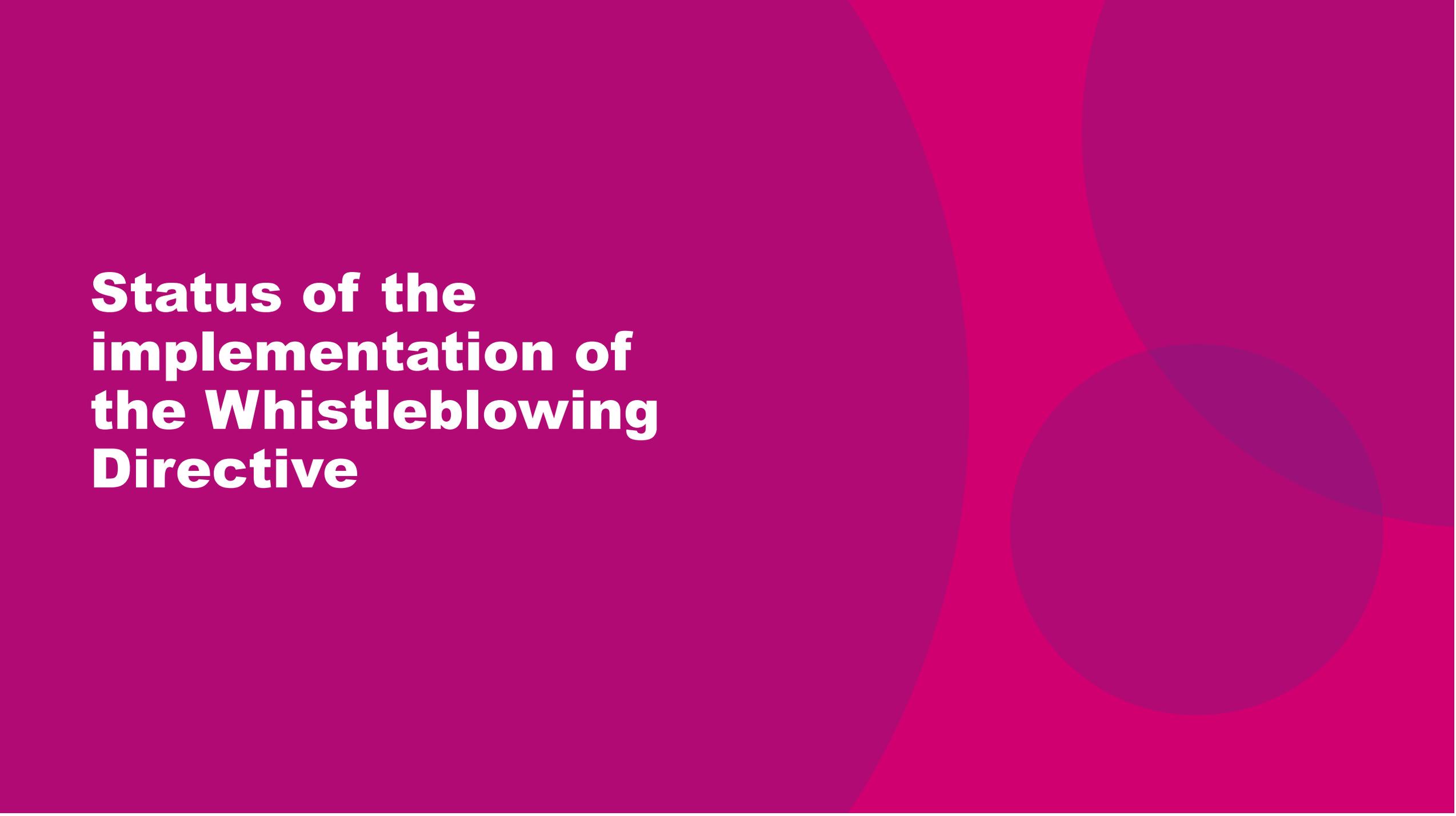
### Oceania

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?**

大成 DENTONS

# Dentons' Whistleblowing Line and Suite of Solutions

# Thank you for attending