

Procedures for Handling Reports to ICANN's Anonymous Hotline

The Internet Corporation for Assigned Names and Numbers ("ICANN" or "Organization") utilizes [REDACTED] or "Hotline Service Provider") to administer the Organization's [REDACTED] receipt of a report, the Hotline Service Provider will notify via email the Organization's General Counsel and Secretary, Deputy General Counsel responsible for employment matters, and Senior Vice President, Global Human Resources (collectively, the "Hotline Committee").

When the Hotline Committee receives a report, the following procedures will be observed, in addition to those outlined in the Anonymous Hotline Policy that can be found on weCANN.

1. The Hotline Committee will convene no later than 24 hours after receipt of notice from the Hotline Service Provider of receiving a report to:
 - i. review the report,
 - ii. determine an appropriate course of action, which might include posing questions to the reporting party through the Hotline Service Provider, and
 - iii. assign responsibilities for conducting an investigation, if warranted under the circumstances.
2. The Hotline Committee will notify the:
 - a. 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.
 - b. 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.
3. If the Hotline Committee determines that additional information is needed from the reporting party to conduct a full and thorough investigation, the Hotline Committee will provide the Hotline Service Provider with questions to ask the reporting party on behalf of the Organization. Upon receipt of responses to those questions, the Hotline Committee will reconvene to determine next steps, including whether an investigation is warranted.
4. The Hotline Service Provider will notify all Hotline Committee members if any member of the Hotline Committee provides questions to the Hotline Service Provider to ask the reporting party. The notification will include the questions that were posed and the name of the Hotline Committee member that posed the questions. Absent objection from any other Hotline Committee member, within four hours of the notification, the Hotline Service Provider will pose the questions to the reporting party and will subsequently provide all responses from the reporting party (anonymously if the reporting party so elects) to all Hotline Committee members.
5. If the Hotline Committee identifies one (or more) of its member(s) as being involved in the reported activity, one of the other Hotline Committee members shall notify the Hotline Service Provider, copying the other members not involved in the matter, that the involved member shall be excluded from any further Hotline Service Provider communications on the relevant matter until otherwise notified.
6. Based on the report (and any subsequent responses received from the reporting party),

the Hotline Committee will determine if an investigation is warranted. If an investigation is to be conducted, the Hotline Committee will assign responsibilities. The Hotline Committee will determine if other Organization executive(s), or the Board of Directors or a particular Board Committee needs to be notified of the investigation; which executive(s) and/or whether the Board or a particular Board Committee, will be notified will depend on the nature of the matter at issue in the relevant report.

7. During an investigation, the investigator(s) may wish to ask questions of the reporting party. If so, numbers 4 through 6 above would apply to the investigative process.
8. The results of any investigation will be documented and maintained confidentially. The results may be reported to various Organization executives as appropriate and may be reported to the Board of Directors or a particular Board Committee, as appropriate.
9. The Hotline Committee will notify the appropriate members of the Organization's management if the investigation results in a determination that action should be taken to address the circumstances identified in the report.