Ethicontrol

Questionnaire: implementing whistleblowing reporting channels with ethics incident and case management.

Project goals	1	What do we want to change or improve in the organization and in what timeframe?
	2	What are the main drivers and requirements?
	3	Which units should be involved in registration and response?
Project scope	4	What situations should be registered? What are the risks in the project focus?
	5	Clearly identify a list of what should currently be neglected or is less "painful"?
	6	Determine the number of units, users, or other characteristics of the organization that will be included in the scope. Are there any exceptions?
	7	Determine the layout of the system. Cloud or on-premise solution. Accept system requirements.
	8	Establish related and dependent projects: Code of Ethics, Corporate Culture Improvement Program, Anti-Corruption Program, Corporate Fraud and Anti-Corruption Program, HSE Occupational Safety Initiatives, Other Compliance Initiatives, Security, and Performance Improvement, Lean Projects, HR Projects.
Implementation tactics	9	Identify elements of the approach to change in the organization's processes and corporate culture. "Big Bang" or "Evolution". System actions or targeted initiatives. What will be the quick wins to make everyone believe in the seriousness of the intentions and the inevitability of the expected changes? What are the requirements for internal communications?
Intake channels	8	Determine the list of intake channels.
	9	Decide on registration jurisdictions, multilingual support
	10	Decide on the mode of operation for each channel - 24/7, 9 to 6, etc
	11	Decide on questions for whistleblowers. Which should be, and which are not? what should be mandatory? Any additional questions about the category?
	12	Decide on a toll-free line
	13	Approve email addresses, web addresses, phone numbers, and more.
	14	Set up and integrate your system feeds
Budget	15	Request and approve the project budget depending on the decisions chosen
Process	16	Secure a single responsible officer for the success of the project
	17	Approve high-level stages of the incident life cycle. From registration to the decision.
	18	Does the process need escalation to a higher level? Audit Committee, Supervisory Board, etc.

	19	If yes, identify users of the escalation team.
	20	Determine if someone will be involved in incident coordination and primary review.
	21	Identify a user with the Supervisor and Administrator role
	22	Identify users who will receive incidents for review and response - the Case Manager role (Lead Investigator), the persons assigned to an incident (case).
	23	Identify the number of system users who will have periodic access to the cases and take part in investigations - the role of the Investigator (team member). By default, they have no access other than that provided by a Case Manager.
	24	Determine the timing of response and duration of the incident in one or another status.
	25	What are the rules for assigning a priority? What does priority mean for the system other than changing response times? Does the priority depend on the category of the violation or unit or something else?
Directories and dictionaries	26	Determine the level of integration of people directories and units and the process of maintaining them up-to-date. The default is manual user mode with Administrator rights. Should all employees be pulled into the system for the convenience of drop-down lists or searches? If so, then a list of names is required.
	27	Prepare and approve directories of titles: Categories, Divisions, Priorities, Users, etc.
Adaptation and branding	28	Determine the need to adapt the design and text and messages in accordance with the Implementation Protocol.
Preparation for implementation	29	We form a specification and a commercial offer, Non-Disclosure Agreement, DPA and Service Agreement
	30	Together with you, we are preparing the Protocol for implementation of the system (setup protocol)
	31	Amend legal texts to meet the requirements of one or another jurisdiction on the protection of whistleblowers, data confidentiality and data processing.
	32	Preparation of plan and materials for the communication campaign
Implementation	33	We prepare the complex of services for launch according to the Protocol within 14 days from the date of its receipt. Testing services.
	34	We train your internal users who will be responsible for responding.
Start and communication campaign.		

Actionable steps template

1. Sign the contract. Please find attached the draft. If ok, we will send it over DocuSign or simply a pdf scan. If the agreement is done - we will issue an invoice.
2. Review the questions in the Implementation Roadmap Document to ensure you have the requirements for the TO-BE process. We suggest having a quick call to discuss it. If you have written SOPs or compliance policies - please share them with the implementation team. The brand book or any other communication guidelines as well, so that we could start adaptation of the web intake.
3. We roll out a platform (in test mode) for your company preliminary branded and prepared according to your SOPs.
   a. Please approve the proposed address for the email channel company@ethics.email or suggest your version.
   b. Please choose and approve the proposed address for the whistleblowing portal:
      i. company.ethics.help - **recommended**
      ii. company.whistleblowing.click
      iii. company.whistle.contact
      iv. company.speakup.click
      v. company.ethics.contact
      vi. company.whistle.link
      vii. company.ethicontrol.com
   c. Confirm the name of your reporting facility/business process or suggest your own:
      i. Companyname Ethics helpline - **recommended**
      ii. Companyname Ethics control service
      iii. Companyname Compliance line
      iv. Companyname Business conduct hotline
      v. Companyname Integrity line
   d. Provide a list of divisions or branches (not departments) that will be displayed in the reporter's intake form and analytics. They can be added during the project.
   e. Provide links or scans of documents that will be available for reading through links in the footer of the reporter's intake form.
4. We provide you with access to your system running in test mode.
   a. Make sure to white list ethics.email, noreply@ethics.email, and 185.250.239.119 to receive email notifications.
5. You go through the system (or we do it together with the initial team) and provide us with the list of adjustments (buttons, screens order, texts, legal stuff etc.). We call the list-setup protocol.
6. We implement the setup protocol requirements into the system.
7. We run online training for your users and create test cases.
8. You create and play with mock cases for a while.
9. We delete test cases and clear statistics. The test mode is over.
10. The system is live. You run a communication campaign based on the materials we provide (if needed).

(for on premise rollouts only)

#	Steps	Timeline	Responsible
1	Sign the contract.	Start	Both
2	Review the questions in the Implementation Roadmap Document to ensure you have the requirements for the TO-BE process. We suggest having a quick call to discuss it. If you have written SOPs or compliance policies - please share them with the implementation team. The brand book or any other communication guidelines as well, so that we could start adaptation of the web intake.	3 working days	Customer
3	Initial kick off meeting with the dedicated project manager from Customer and the Ethicontrol team	3 working days	Both

4	Provide access to virtual machines
	● Two VPS instances or servers;
	● Allowed inbound traffic for ports 80, 443, 22 and outbound internet traffic for all ports (at least for setup period)
	● Preinstalled server OS - Ubuntu 24.04 LTS
	● Enabled SSH access and root user credentials shared with us.
	● SSH access to be accessible from our IPs only:
	  ○ 139.162.189.95
	  ○ 64.226.105.173
	  ○ 139.162.166.148
	  ○ 139.162.179.91
	  ○ 172.105.75.127 - IP of Jump server
	● Minimum hardware requirements:
	  ○ machine 1: 2 cores CPU, 4 GB ram, 25Gb SSD.
	  ○ machine 2: 2 cores CPU, 8 GB ram, 100Gb SSD.
		5 working days	Customer

5	Please approve the proposed address for the email channel company@ethics.email or suggest your version. If you plan to use your mailbox - please provide respective IMAP credentials: internal ip address, port, login, pass, encryption type For transactional emails - provide SMTP server of yours: - SMTP Server Address (e.g., smtp.yourdomain.com) - SMTP Port (commonly 587 for TLS or 465 for SSL) - Username / Login Email - Password / App-specific password (if applicable) - Encryption Type (SSL, TLS, or None) - Sender Email Address (used as the "From" in emails) - Are there any IP allow/block listing requirements for sending?	2 working days	Customer
6	Please choose and approve the proposed address for the whistleblowing portal: elpedison.ethics.help	2 working days	Customer

	If you plan to use your domain - please provide the name and make respective DNS settings for the IP addresses of VPSs Make sure you will point in domain DNS to the respective IP addresses.		
7	Confirm the name of your reporting facility/business process or suggest your own: Company Ethics Helpline	2 working days	Customer
8	Rollout the staging portals preliminary branded and prepared according to Customer's policies and SOPs.	7 working days	Vendor
9	Provide a list of divisions or branches (not departments) that will be displayed in the reporter's intake form and analytics. They can be added during the project.	2 working days	Customer
10	Provide links or scans of documents that will be available for reading through links in the footer of the reporter's intake form.	2 working days	Customer
11	Iteration 1. Go through the staging system (or we do it together with the initial team) and provide the list of adjustments (buttons, screens order, texts, legal stuff etc.). We call the list-setup protocol.	3 working days	Customer
12	Implement the setup protocol requirements.	5 working days	Vendor
13	Iteration 2. Go through the staging system (or we do it together with the initial team) and provide the list of adjustments	3 working days	Customer
14	Implement the setup protocol requirements.	5 working days	Vendor
15	Finalize configuration and apply to production servers	5 working days	Vendor
16	User acceptance testing (UAT)	3 working days	Both
17	Online training for users and creating test cases.	2 working days	Both
18	Delete test cases and clear statistics. The test mode is over.	2 working days	Vendor
19	The system is live. Run a communication campaign based on the materials Ethicontrol provided (if needed).	n/a	Both