

## PROCEDURE P4

# Alert Procedure

---

CERTIFYING EXCELLENCE IN ANTI-CORRUPTION COMPLIANCE

### **ETHIC Intelligence**

10, rue Pergolèse 75116 Paris – France

Tel. 33 (0) 1 70 08 73 16

Fax 33 (0) 1 53 81 01 78

[www.ethic-intelligence.com](http://www.ethic-intelligence.com)



ETHIC Intelligence® is an independent certification agency within The Red Flag Group®.

## 1. Handling concerns at ETHIC Intelligence

ETHIC Intelligence attaches the utmost importance to integrity in its business practices and has designed three processes to handle concerns that anyone within or without the company wishes to raise:

- **Alert process** when the concern relates to the behavior of employees or auditors, including suspected conflicts of interest
- **Complaint process** when the concern relates to the way ETHIC Intelligence operates including breaches of ISO 17021;1 or ISO 17021.9 which govern the way Certification Bodies certify ISO 37001
- **Appeal process** when the concern relates to a certification-related decision regarding the denial, suspension or scope reduction of a certificate

The following document details the **Alert process**.

## 2. Objectives of the Alert Process

The objective of the alert process is to:

- Allow anyone to share a concern related to the behavior of employees or auditors, including suspected conflicts of interest
- Ensure that, if necessary, appropriate remediation and corrective actions are taken
- Track and record alerts as well as corrective actions

## 3. Principles of the Alert Process

The “[alert@ethic-intelligence.com](mailto:alert@ethic-intelligence.com)” is publicly available on the ETHIC Intelligence website.

Alerts can be raised anonymously, but attention is drawn to the fact that the person handling the alert might need to discuss the details with the whistleblower.

Communications on [alert@ethic-intelligence.com](mailto:alert@ethic-intelligence.com) are treated confidentially by the Compliance Analyst and Quality Manager.

If deemed appropriate the alert is reported to the President of the ETHIC Intelligence Impartiality Committee who protects the anonymity of the whistleblower, if requested by the latter.

An alert which mentions the name of a client is communicated to said client by the Chairman of the Impartiality Committee while preserving the anonymity of the informant.

Decisions following an alert are communicated, if appropriate and if possible, to the whistleblower.

## **4. Modalities of the Alert Process**

1. The Compliance Analyst and Quality Manager receives the alert and determines how the alert should be treated.
2. If the alert is a complaint or is related to an appeal, he/she will apply the complaint or appeal process.
3. All alerts shall be recorded within the: "EI R30 Alert Reporting" including when the alert refers to a complaint or an appeals issue.
4. The Compliance Analyst and Quality Manager analyses the need for an investigation. He/she may decide not to address the alert if the latter is frivolous and this will be explained in the "EI R30 Alert Reporting."
5. The Compliance Analyst and Quality Manager shares the alert with the Chairman of the Certification Committee and suggests ways to proceed.
6. If the alert mentions the name of a client, the Chairman of the Certification Committee shares the alert with said client and indicates how ETHIC Intelligence will treat the matter. The identity of the whistleblower shall be kept confidential.
7. Following a thorough investigation of the alert, the Compliance Analyst and Quality Manager suggests corrective actions to the Chairman of the Certification Committee
8. The Chairman of the Impartiality Committee takes the appropriate decision which is communicated to the whistleblower and, if necessary, to the client.
9. The details of the alert, the subsequent investigation and any actions taken are recorded and filed within the: "EI R30 Alert Reporting."