



CULTIVATING A ROBUST SPEAK-UP CULTURE



This module is one of three in an
ongoing series on Ethics and Compliance

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PREFACE: THE ANTI-CORRUPTION WORKING GROUP & ITS SERIES OF COMPLIANCE MODULES

1.1. INTRODUCTION

Convened under the guidance of the Pearl Initiative, a leading organization in the Gulf dedicated to bolstering corporate governance, transparency, and accountability, the Anti-corruption working group assembles representatives from prominent companies such as **stc**, **SABIC**, **Siemens**, **Chalhoub Group**, **Tamer Group**, **Marsh**, **Crescent Petroleum**, **Dana Gas** and **CCC**.

Serving as a nexus for collaboration and dialogue, the group touches upon pivotal subjects of corporate governance and compliance. Drawing from their collective expertise, experiences, and insights, the working group dedicates itself to refining the understanding and execution of ethical business practices throughout the region's various sectors.

This 3-part series is a testament to the collaborative efforts of the following working group members:



1.2. PURPOSE

In today's business environment, a strong Ethics and Compliance program is essential for companies striving to maintain a culture of integrity internally and externally. While individual companies might have different compliance approaches, there is a consistent need for understanding the fundamental elements of these programs.

To address this, the working group has developed a series of modules that cover several elements of a compliance program, including:



**Leadership Engagement
and Accountability**



**Speak-up
Culture**



Communications

It's important to note that these guidebooks are intended to provide a very high-level overview of the subjects rather than a tailored, step-by-step approach. Nonetheless, this collection serves as a valuable resource for the entire Gulf business community, guiding businesses towards more ethical and transparent practices. Additional modules will be introduced to explore further aspects of a compliance program in the future.

02

INTRODUCTION ON THE IMPORTANCE OF CULTIVATING A SPEAK-UP CULTURE

In today's dynamic organizational landscape, the emphasis on ethical standards and transparent communication stands paramount. Central to fostering this environment is the concept of a **"speak-up culture," an atmosphere where employees feel empowered to voice concerns, ideas, or questions without fear of backlash.**

Embodying the principles of transparency, inclusivity, and accountability, a prime example of a healthy speak-up culture is having an effective process in place. Speak-up entails the act of raising concerns about unethical or illegal activities through available channels, be it a supervisor, a designated individual within the organization, or a hotline channel if available.

Anchoring these initiatives is the "Code of Ethics," a foundational document that details the ethical and behavioral standards expected of all affiliated with the company. It ensures a consistent approach to business practices while reinforcing the importance of a speak-up ethos. With such mechanisms in place, organizations not only safeguard their reputation but also pave the way for personal development, self-advocacy, and an enhanced sense of individual ownership among their members.



03

LEADERSHIP'S ROLE IN CULTIVATING A SPEAK-UP CULTURE

Leadership plays a pivotal role in shaping an organization's culture, especially when it comes to fostering an environment where employees feel empowered to speak up.

When organizational leaders actively encourage open communication and demonstrate it through their actions, it sets a precedent.

For instance, leaders might hold regular open forums where:



Employees can voice concerns

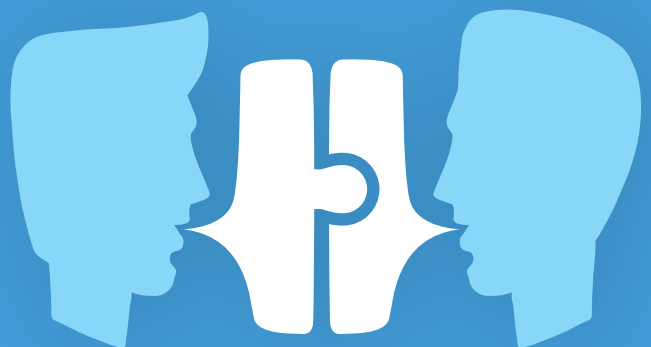


Implement anonymous feedback systems to ensure all opinions are heard without fear of repercussion



Celebrate individuals who provide constructive feedback, underscoring the value of speaking up

This proactive approach not only communicates the value placed on transparency but also emphasizes the importance of every voice within the organization. Leaders who prioritize open dialogue effectively lay the groundwork for trust. As this trust deepens, employees across all levels become more inclined to share their insights, concerns, and perspectives. It's this ripple effect, initiated by leadership, that ensures a culture of speaking up is ingrained throughout the organization. For further information about the leadership role in cultivating Business integrity, the Leadership Engagement and Accountability - Guidebook Module offers further insights.



SPEAK-UP REPORTING CHANNELS

For organizations committed to maintaining integrity and ensuring ethical behavior, having transparent and reliable Speak-up reporting channels is imperative. Speaking up involves the act of reporting misconduct, malpractice, or unethical actions within an organization.

Establishing trusted avenues for these reports ensures that concerns are addressed promptly and with discretion. Here's a closer look at these specific channels:



A. Supervisors or Direct Managers:

They often serve as a primary point of contact. Both internal employees and external partners, such as vendors or suppliers, might feel most comfortable raising their initial concerns with familiar figures. This direct communication can be pivotal for relaying and addressing potential issues. Managers should be trained to appropriately identify and deal with reports of misconduct.



B. Human Resources Department:

The HR department serves as a neutral ground for employees to report any misconduct or unethical behavior. Furthermore, HR personnel is responsible of protecting the rights of both alleged and the reported person and taking appropriate corrective action.



C. Designated Individuals within the Organization:

Some organizations appoint specific individuals or teams, such as Ethics or Compliance Officers, to handle and guide speak-up reports. Available to both internal and external stakeholders, this channel ensures confidentiality and appropriate action, especially in sensitive cases.



D. Hotline Channels:

Tailored for situations where a higher degree of anonymity is desired, these channels, whether toll-free numbers or online platforms managed in house or outsourced, offer the allegeders the safety of voicing their concerns without revealing their identity.

One or more of these channels should be available not just for the organization's staff but also any affiliated party, such as a vendor, contractor, supplier, or customer. By ensuring broad accessibility to these channels, an organization underscores its commitment to transparency and ethical oversight. Periodic training sessions and awareness campaigns for employees can further solidify trust, ensuring that anyone considering speaking-up feels safe and protected in doing so. For further information about the importance of organizing trainings and awareness sessions, the Communication Module offers further insights.

FRAMEWORK FOR IMPLEMENTING A SPEAK-UP CULTURE

The pillars that underpin a successful business are integrity and trust. Any violation of the principles outlined in the company's Code of Ethics would constitute an ethical breach. The Code of Ethics serves as a framework to direct the employees in upholding the safeguarding of personnel, the honesty of the business operations, the responsibility of the leadership and the reputation of the organization, its employees, its reputation & its assets. The reporting channels set in place within an organization are designed to receive reports of any suspected instances that may lead to a violation of applicable laws or policies with respect to business practices and ethical conduct.

It is crucial to develop a healthy, supportive culture where self-reporting and speaking up are encouraged by highlighting confidentiality and non-retaliation.

CONFIDENTIALITY AND SAFEGUARDING AGAINST RETALIATION

Organizations should remain dedicated to maintaining absolute confidentiality when dealing with Speak-up cases, approaching each situation with care, consideration, and tact. This standard of confidentiality applies equally to everyone involved, from the reporter to any witnesses and the individual under scrutiny. Trust and confidentiality go hand in hand: the organization trusts that any reports submitted are made in good faith, and those who submit them can trust that the matter will be handled with the utmost care.

The fear of retaliation is a significant barrier that often discourages potential allegers from reporting misconduct. Protecting the anonymity of these individuals is paramount in alleviating such fears. While retaliation can take many forms – from overt actions like job termination or demotion to subtler forms like isolation or sidelining – the preservation of anonymity can significantly diminish the potential for such repercussions.

To safeguard allegers, organizations can implement measures such as:



A. Anonymous Reporting Systems:

Provide secure platforms where employees can submit concerns without revealing their identity.



B. Regular Check-ins:

After a report is made, designated personnel can periodically check on the allegger (if the identity of the person is known) to ensure their safety and well-being, without compromising their anonymity.



C. Training Programs:

Educate employees and managers about the importance of protecting the whistleblower and the consequences of retaliation.



D. Third-party Oversight:

Engage an independent body or consultant to oversee the Speak-up process, ensuring impartiality and protection.

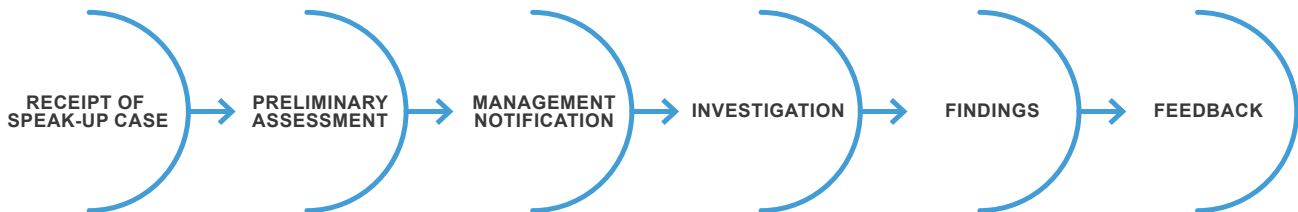
By ensuring that an whistleblower's identity remains confidential, organizations not only safeguard the individual from potential harm but also reinforce a culture of trust and transparency. When employees are confident that they can report concerns anonymously, they are more likely to step forward, thus promoting an environment where ethical considerations are brought to the forefront.

Furthermore, post-reporting dynamics can often be delicate, with heightened emotions and potential misunderstandings. In such situations, it's crucial for organizations to provide coaching on conflict resolution. This helps employees and management address any tensions, ensuring they collaboratively move forward after a complaint. This emphasis on resolution, post-investigation, further underlines an organization's commitment to fostering a harmonious and transparent workplace culture. By valuing and emphasizing both anonymity and conflict resolution, organizations demonstrate a genuine commitment to combating unethical behavior and protecting those who have the courage to speak up.



INVESTIGATION PROCESS FOR SPEAK-UP CASES

Before delving into the compliance investigation process, it's essential to note that the following is a high-level overview intended to provide general guidance. This summary should not be construed as a comprehensive or detailed process, but rather a starting point for understanding the essential steps involved.



A. Receipt of Speak-Up:

Allegers can report concerns through one of the reporting channels. They have the right to keep their identity anonymous. The person receiving the report must acknowledge receipt of the concern raised by the allegor by understanding the concern, confirm confidentiality, explain the investigation process, and manage expectations. Once all relevant information and any available documentation or evidence are collected, the case should be recorded and archived in the investigator's records in a manner that ensures security, compliance, and accessibility for future reference if required.



B. Preliminary Assessment:

Concerns received through reporting channels, can vary from ethical issues to HR concerns or business-related issues. Therefore, the investigator should evaluate the nature of the concern and assign the case accordingly to the right department. If it is an ethical case, the investigator should determine the best approach for the investigation.



C. Investigation Team:

This team often includes individuals with expertise in legal, HR, compliance, and relevant areas. The investigation team creates a plan outlining the scope, objectives, methodology, and timeline of the investigation. They also identify relevant laws, regulations, and company policies that apply to the case.



D. Management Notification:

Especially for potential severe misconduct or violations, an outline of the intended investigative steps should be shared with senior management of the alleged person before the start of the investigation. It is important to always safeguard the name of the messenger during the full process and to only disclose their names to the inquiry team and the decision makers. In certain cases, it might be obligatory to notify government authorities immediately, like in instances of personal data breaches or specific financial irregularities.



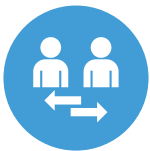
E. Investigation:

The organization should have a detailed and documented Internal investigation policy which includes the process of collecting evidence through interviews with witnesses, document reviews, data analysis, and other methods. Once the investigators have gathered enough evidence, the investigation team can formally address the reported person. It's crucial to maintain confidentiality and protect the rights of all parties involved during this process.



F. Findings:

After completing the investigation, if a violation is found, recommendations should be shared with the individuals or entities responsible for making decisions. This could include disciplinary actions, coaching, process changes, or procedure revisions. The consequences for ethical violations or misconduct will depend on the country's laws and regulations. In some cases, government authorities may need to be informed about the investigation's outcome. A closure report should then be drafted and archived. Some unsubstantiated cases may highlight the need for action, such as updating or reinforcing processes or policies, or organizing speak-up awareness sessions within the organization.



G. Feedback:

The alleged should be informed about the investigation's outcome. However, the content of this feedback should respect confidentiality and privacy, and findings or conclusions should be shared only on a need-to-know basis.

DECISION-MAKING PROCESS OF SPEAK-UP CASES

It's essential for organizations to have clear and transparent processes for handling speak-up cases, including defining the roles and responsibilities of those involved in the decision-making process. This helps ensure that cases are resolved fairly, ethically, and in accordance with relevant guidelines.

The individuals or entities responsible for making decisions once a speak-up case is investigated can vary widely depending on the nature and severity of the case, the organization's policies and procedures, and applicable laws and regulations. Typically, at least three individuals participate in the decision-making process, with one being a permanent member. To ensure fair, impartial, and thorough evaluations, it's advised that one of these decision-makers is at least two organizational levels removed from the person being reported on, and not in the direct reporting line, thus ensuring independence and transparency.

The decision-making process in the resolution of a speak-up case may involve various parties, including the Ethics Committee (if established), HR, Management, External Experts, Board of Directors, Legal Department, and CEO or Executive Leadership, depending on the severity of the case.



All cases, along with their related documents, must be archived in the investigator's records, ensuring both security and compliance while also allowing for easy accessibility for future reference if necessary. Keeping track and analysing reporting data of ethical cases received is an essential step for companies to identify areas that require improvement and to strengthen their processes and policies. By doing so, companies can uncover potential risks that may have been overlooked and take steps to address them proactively.

Through careful analysis of ethical cases, companies can identify patterns and trends that can be used to develop targeted solutions, such as training, awareness campaign or by improving their processes and policies. These enhancements can reduce the likelihood of ethical violations and associated risks. Additionally, having strong processes and policies in place can help companies to demonstrate their commitment to ethical behavior to stakeholders, including employees, customers, and investors.



IDENTIFICATION OF QUALIFIED PROFESSIONALS FOR EFFECTIVE IMPLEMENTATION OF A SPEAK-UP PROCEDURE IN SMEs

In larger corporations, it's common for the person handling speak-up reports to occupy a non-operational role, frequently associated with the compliance or legal department. Employing an internal expert for the speak-up program offers advantages like quick responses, maintaining the organization's confidentiality, alignment with its culture, and a cost-effective, reliable approach to addressing employee concerns.

However, in the case of smaller businesses with fewer staff, they often lack dedicated departments for these purposes, and establishing one may seem unnecessary and expensive. Consequently, some small and medium-sized enterprises (SMEs) opt to engage external entities to manage speak-up reports. These external parties may include law firms, audit firms, or specialized forensic investigation firms, all of which possess the necessary skills and services.

In addition to providing access to the necessary skills and reducing costs on an as-needed basis, engaging an external party has other advantages for handling Speak-up cases in SMEs. One advantage is that an external person is more independent of the company's employees and managers. This creates credibility and trust for employees of smaller companies, increasing the likelihood that the alleged will remain anonymous. Furthermore, external experts are trained to handle alleged reports appropriately and can support management teams in discussions, investigations, and other follow-up procedures, if necessary.



Outlined below are key practices related to fostering a speak-up culture, as adopted by organizations within our anti-corruption working group.



A. SABIC

Ranked among the world's largest petrochemicals manufacturers, SABIC is a public company based in Riyadh, Saudi Arabia. 70% of the company's shares are owned by Saudi Aramco, with the remaining 30% publicly traded on the Saudi stock exchange. SABIC's growth has been nothing short of miraculous. Today, the company has operations in around 50 countries with a global workforce of over 31,000 talented individuals. At SABIC, our success is based on a culture of integrity. The Integrity Culture promotes quality and innovation. It also maintains high standards for the environment, health and safety, fair employment, and sustainability. Integrity is at the heart of everything we do.

Our commitment to compliance and Integrity Culture go beyond preventing violations and the associated consequences. Operating with integrity and promoting a company-wide Integrity Culture are the keys to achieving SABIC's long-term goals.

The backbone of our Integrity Culture is our Code of Ethics. The SABIC Code of Ethics is perfectly aligned with our values. It identifies responsible business conduct and prioritizes corporate integrity. This integrity creates a healthy company culture and business environment. It also attracts investment, which in turn enhances economic growth and international trade. The priority we place on integrity and corporate citizenship is reflected in our commitment to Responsible Care®, the United Nations Global Compact, and the World Business Council for Sustainable Development.

We are all responsible for abiding by the Code of Ethics and understanding the compliance risks that can impact our jobs. SABIC employees annually acknowledge their understanding of the Code of Ethics and complete trainings on the policies within the Code of Ethics. Employees are responsible for promptly raising concerns regarding integrity or potential Code violations. Failure to do so can adversely affect our company, employees and the communities in which we operate. Every employee is empowered to voice questions and raise concerns through a variety of reporting channels that are available across the company. SABIC respects confidentially and strictly prohibits retaliation of any kind against persons who raise or help address integrity concerns.

As a member of the UN Global Compact, SABIC fully endorses, supports, and adheres to principles promoting awareness and enhancing respect for human rights, labor, the environment, and anti-corruption. Our Integrity Culture earns SABIC global recognition. To promote an atmosphere where our employees and other stakeholders, including customers, vendors and communities, feel free to raise any compliance concerns including those related to human rights without fear of retaliation. We have a variety of ways to report compliance concerns.

We have a global organization of Integrity Ambassadors who support SABIC's Compliance Program. They are employees of all levels who are responsible for receiving concerns and ensuring they are investigated and addressed. Employees can also raise their concerns through several other platforms including, any manager, Human Resources, or Legal Affairs, or an internal reporting icon. Additionally, any internal or external stakeholder can report concerns through integrity@sabic.com or contact one of our regional Integrity Ambassadors. The number and type of concerns raised, as well as their disposition, are measured, tracked and reported.



B. Siemens

Siemens, a technology company with operations in over 180 countries, has always been at the forefront of adapting to the evolving corporate world and its regulations. Leveraging our vast experience in industry, infrastructure, transport, and healthcare, we aim to offer real value to customers by merging the real and digital worlds. This enables them to transform their industries, improving everyday life for billions. Our majority stake in Siemens Healthineers and a minority in Siemens Energy reinforces our technological leadership.

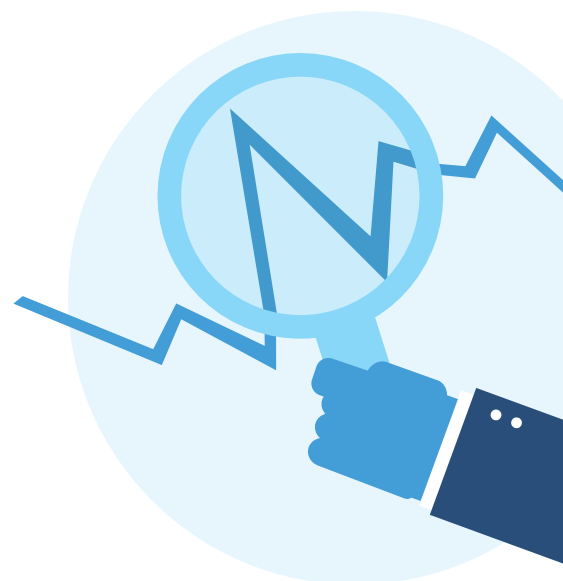
Siemens is well defined at its website link <https://www.siemens.com/global/en.html> and its compliance system on this one <https://www.siemens.com/global/en/company/about/compliance.html>

At Siemens there is a principal differentiation on Speak Up Culture and whistleblowing. Speaking up is not seen in the limited perspective of reporting violations, non-compliances or deviation from policies, it is in fact on a broader scale is enriching a culture of everyone has the encouragement to speak their mind. To share idea, to make proposals to have difference of opinion, to disagree, to challenge legacy and explore new avenues and dimensions. Speak up is the confidence given at every layer of organization to think differently and with a growth mindset and then openly share it. We value the concept of agreeing to disagree wholesomely.

Whistleblowing or reporting of non-compliant behavior whether of our Business Conduct Guidelines or of any legal/statutory requirement goes through a very well structure process and mechanism. Siemens maintains at global level multiple independent channels of reporting starting from Tell us, a third-party service provider complaint system. This reporting system is on the platform of a highly secure system of BKMS. As this is Siemens single channel of reporting all cases so it records not only compliance and ethical issues but also human resource, environmental, health and safety, data privacy, export control etc., related matters as well.

Vide Tell Us one has the option to submit complaint using online complaint reporting portal or just pick up the phone and call toll free numbers where multilingual operators very diligently registers the case. Confidentiality and privacy are of paramount importance and using a third party service provider it is ensured meticulously. Tell Us offer a complainant the option of reporting any issue completely anonymously or disclosing the identity to the compliance team but can still remain anonymous or report it with openly disclosing the identity. To ensure no retaliation takes place Siemens has a very strict Whistleblower protection and non-retaliation policy any violation of this regulation in itself is a compliance violation. In addition to Tell Us there is additional reporting channel of Ombudsperson who is completely neutral independent legal expert who when approached for a complaint, ensures an independent transparent and objective assessment of reported violation and confirms all such plausible matters are investigated and properly concluded.

To manage all reported complaint a dedicated section of global compliance department with experienced legal team is assigned all around the globe in a hub structure. All plausible matters are cascaded to investigation department/hubs. Siemens maintain within the organization of Chief Compliance officer a separate independent investigation function which is staffed with highly experienced lawyers and investigators having background of formal investigation. For specific topics of books and records and forensic matter we have experts of accounting and forensic IT background. A formal code of conduct on investigation is a binding document which is analogously applicable across the world, and it is followed in toto to maintain consistent implementation of investigation code across the region, organization and departments. Thus, whether an investigation is of fraud, corruption, books and record or of environmental issue, investigation process remains in line with the code of conduct of investigation.



Every investigation is covered through a formal investigation protocol and has a dedicated investigator and case lawyer. Investigation when conclude and report issued are then moved to the department of remediation which coordinated implementation of remediation actions.



C. Chalhoub Group

Chalhoub Group is the leading partner for luxury across the Middle East since 1955. As an expert in retail, distribution and marketing services based in Dubai, the Group has become a major player in the beauty, fashion and gift sectors regionally. Blending its Middle East expertise and intimate knowledge of luxury, Chalhoub Group is building brands in the region by offering service excellence to all its partners and a unique experience to its customers.

Everything we do at Chalhoub Group is built on the firm foundations of ethics and integrity. To ensure we operate a responsible business, we have implemented robust policies and frameworks reflecting our support of the United Nations Declaration of Human Rights. We have aligned our commitments to the United Nations Global Compact (UNGC) and Women Empowerment Principles (UN WEP), which underline our respect for our people's freedom, equality and dignity. This initiative has helped foster equity and inclusivity across our Group for our people, partners and customers.

Our Code of Ethics continues to remain our primary framework for steering our approach to ethics, integrity and acceptable behaviour. We require all our teams to be trained annually on the CoE. This is followed up by our Speak Up platform which enables anyone to express opinions and/ or concerns over CoE breaches, anonymously. We adopt a zero-tolerance policy in the case of retaliation against a messenger and the result is termination of the individual in question. The platform facilitates preventive measures through analysis and reporting of CoE breaches, and also helps detect trends, violation types and activities of concern by country.

To promote the Speak-Up platform, Chalhoub Group engages strong communication through various channels, our internal daily newsletters, internal website and on screens located in office spaces. Also, in warehouses, stores, and stock rooms, we ensure the display of Speak-Up posters that include both the link and phone numbers for reporting. Chalhoub Group schedules regular visits and sessions each year to continue raising awareness about the platform and its importance. In 2023, we also launched an overview newsletter to promote our culture of business integrity and provide full transparency internally on the various initiatives and programmes that were implemented throughout the entire year of 2022. It also includes high level Speak-up statistics. This newsletter will be release on a semi-annual basis.



D. stc

stc group is an engine of digital transformation, offering advanced solutions and driving a role in the digitization process. The group provides a comprehensive suite of services encompassing digital infrastructure, cloud computing, cybersecurity, Internet of Things (IoT), digital payments, digital media, and digital entertainment. The group comprises over 14 subsidiaries across the Kingdom of Saudi Arabia, the Middle East, North Africa, and Europe.

With regards to speak-up culture, stc group's leadership is committed to fostering a work culture where employees feel comfortable raising integrity concerns and reporting potential violations of our Code of Ethics.

Employees and stakeholders are encouraged to report all integrity concerns through the designated Speak Up channels.

THESE CHANNELS INCLUDE:



Managers
(respective employee managers, interdepartmental managers)



The stc group HR team



The Business Integrity team



The Speak Up email
(speak-up@stc.com.sa)

Employees, suppliers, or any external stakeholders' integrity concerns can be raised anonymously by messaging the Speak Up email without disclosing personal information, allowing reporting without fear of reprisal. All concerns are treated seriously and dealt with in a professional manner.

Further, stc group regularly communicates with employees, through the available internal channels, to increase their awareness of the designated Speak Up channels. The importance of speaking up is also covered in detail in all Compliance and Ethics related training. stc group's Business Integrity team reviews each allegation to ensure it is being raised in good faith, and a preliminary assessment is undertaken to determine how each concern will be processed. If a concern does not align with the integrity criteria that our team has established, we will redirect it to the relevant business unit or corporate function for resolution.

Regardless of how the concern is defined, stc group enforces a strict policy prohibiting retaliation against any person who makes a report in good faith or participates in a compliance investigation. Once investigations are completed, depending on the severity of their offence, employees may face repercussions ranging from a formal warning to termination. Disciplinary action is determined by considering all factors surrounding an incident and its consequences. Suppose an employee is accused of wrongful conduct, in that case, they will have a fair and impartial opportunity to respond to the allegations before any determination is made with respect to the alleged wrongdoing.

stc group has strict policies in place to prevent incidents of workplace discrimination and harassment. All employees across the group are required to abide by the stc group Code of Ethics and, as per the code and Fair Employment Policy, stc group respects the diversity of its workplace and prohibits harassment and bullying in any form. Violations of these policies are taken very seriously, and all employees are encouraged to report such violations through the Speak Up process.





E. CCC

Consolidated Contractors Company (CCC), a leading diversified company carrying out construction, engineering, procurement, development and investment activities internationally, which is committed to providing reliable, amicable, and professional service to clients while being supportive to local businesses and social activities, within which CCC operates.

CCC's Speak-up Culture which is integrated within the Ethics and Compliance Manual (EACM), Emphasizes and reflects the company's longstanding commitment to excellence, Integrity, Honesty, and Reliability. This is demonstrated in CCC's Golden Rules embedded in the core values, consistently exhibited by the employees and management:

We treat everyone with respect.

We act with integrity and comply with our work obligations honestly.

We show accountability through taking responsibility for our actions and act to deter wrongdoing.

We only undertake work that we have the knowledge, skills, and resources to carry out.

At CCC, our commitment to upholding the highest standards of integrity and ethical conduct is unwavering. A testament to this commitment is the E&C Weblines - Open Box, a confidential service channel for our officers, employees, and external partners to voice their concerns transparently. This platform offers an avenue for individuals to consult with trained professionals about any witnessed deviations from our policies, procedures, standards, or legal obligations within our workspace.

Whistleblowing Reporting Modes play a pivotal role in safeguarding employees from the negative repercussions of workplace misconduct. Such mechanisms not only mitigate potential financial and reputational hazards but also fortify the trust between employees, employers, and stakeholders. By promoting a safe environment for speaking up, we embolden more individuals to come forward. All employees are urged to report, with full assurance of confidentiality, any suspicions or evidence of corruption to the Company's E&C Hotline. Recognizing the paramount importance of whistleblowing in today's corporate landscape, these reporting avenues are essential. They act as a protective barrier, shielding individuals from any potential adverse effects of workplace misconduct.

KEY TAKEAWAYS



Integrating an independent and readily available Speak-up platform is crucial for fostering a culture of business integrity. It aligns with the organization's commitment to ethical conduct and provides a structured mechanism for employees to raise concerns and report potential violations.



The primary objective of a Speak-up platform is to identify areas for improvement and take necessary actions to enhance processes, policies, and controls. By addressing these areas, organizations can proactively reduce the likelihood of ethical violations, demonstrate their commitment to ethical behavior, and instill confidence in stakeholders.



Effective governance of the Speak-up platform entails establishing a direct line of communication between the Speak-up officer and the governing body (such as the Ethics committee). This ensures that updates are provided to the highest level of authority and that any matters that management fails to adequately address can be escalated appropriately.



Building trust and promoting employee engagement are integral aspects of a successful Speak-up platform. By offering a confidential and secure channel, employees feel safe to report concerns without fear of retaliation. Maintaining confidentiality throughout the reporting process is crucial, assuring both the reporter and those involved that their identities and investigation results will be protected. The organization must take proactive measures to prevent retaliation, such as regular check-ins, monitoring for fair treatment, and providing coaching on conflict resolution, which collectively contribute to creating a supportive culture within the organization.



ABOUT PEARL INITIATIVE

The Pearl Initiative (PI) is the Gulf region’s leading business-led, non-profit organisation working to promote the business case for a corporate culture of accountability and transparency. Established in 2010 by regional business leaders in cooperation with the United Nations Office for Partnerships, the Pearl Initiative is the only private, non-profit Gulf business network to receive special consultative status from the United Nations Economic and Social Council.

PI spearheads 6 programmes to deliver data-driven insights and amplify the importance of corporate governance principles as a business imperative for corporations, family firms, micro, small and medium-sized enterprises (MSMEs), and philanthropic organisations in the Gulf region.

OUR PROGRAMMES



Governance in Tech



Anti-Corruption Best Practice



Diversity in Business Leadership



Governance in Family Firms



Governance in MSMEs



Governance in Philanthropy