



Global Integrity & Trust

Support for Implementing a Global Whistleblowing System

GI&T Law Office, LC

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List of Services

	1. Implementation Support
①	Local Legal Research & Advice
②	Drafting Internal Rules and Translation into Local Languages
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①	Support Service for Actual Reports
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③	Reporting Consultation



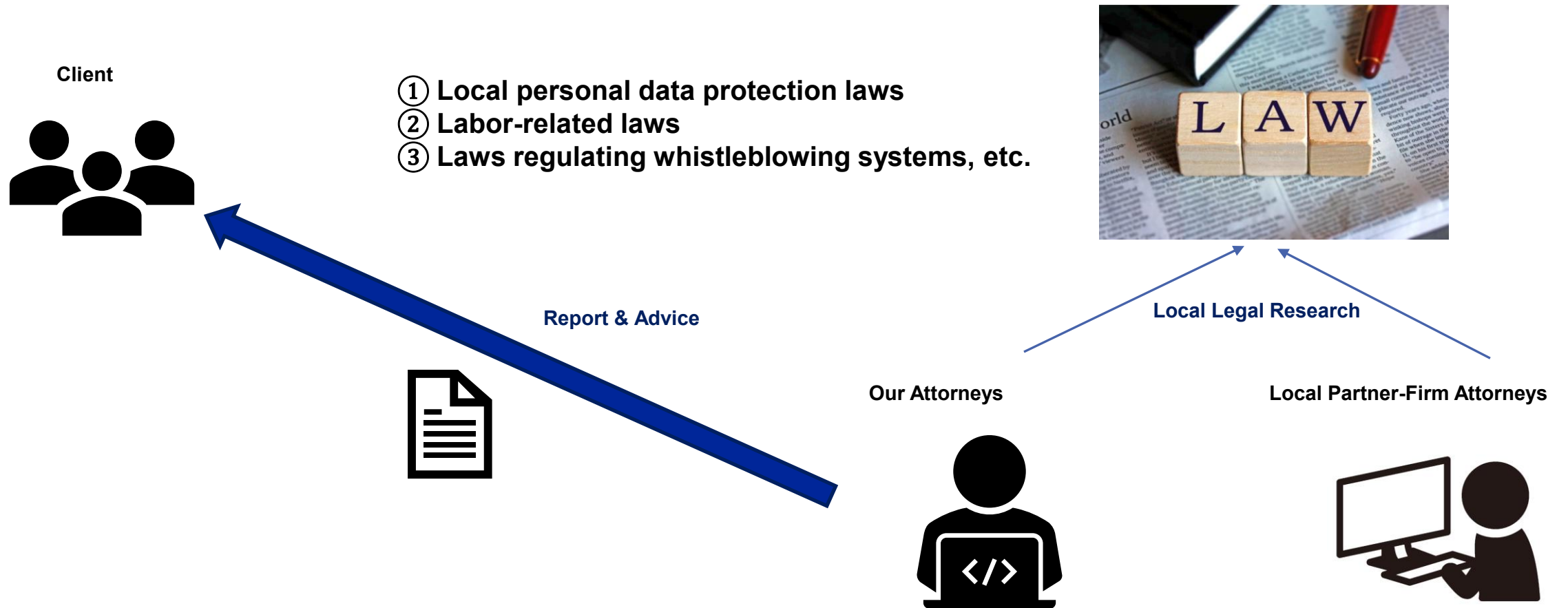
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Implementation Support

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① Local Legal Research & Advice

We have partner firms around the world that conduct local legal research and provide advice



1. Implementation Support

② Drafting Internal Rules and Translation into Local Languages

Based on local legal research, we draft the internal rules required for each site and translate them into the local language



③ Centralized Liaison with the Internal Reporting Hotline Provider

We centrally manage all detailed communications with the internal reporting hotline provider (English support available)



③ Centralized Liaison with the Internal Reporting Hotline Provider (cntd)

Our firm recommends engaging an internal reporting hotline provider to serve as the reporting reception point.

[Advantages of Using an Internal Reporting Hotline Provider as the Reception Point]

① Multi-channel reception service

The more reporting channels available (telephone/web reception), the more likely reports are to come in, which strengthens the compliance framework. On this point, there are providers that support both telephone and web reception (some offering 24-hour telephone reception), as well as low-cost providers specializing in web reception that offer low-cost service.

② Multilingual support

Since a global whistleblowing system requires support in the local language of each country where it operates, reporting hotline providers support multiple languages (some providers support more than 160 languages).

③ Low cost

In principle, cost is proportional to the number of sites and employees, but some providers offer web-only services at a fixed low cost, regardless of scale.

Example: A provider offering 24-hour telephone and web reception – on average, several million yen per year

Example: A low-cost provider specializing in web reception only – from about ¥50,000 per month

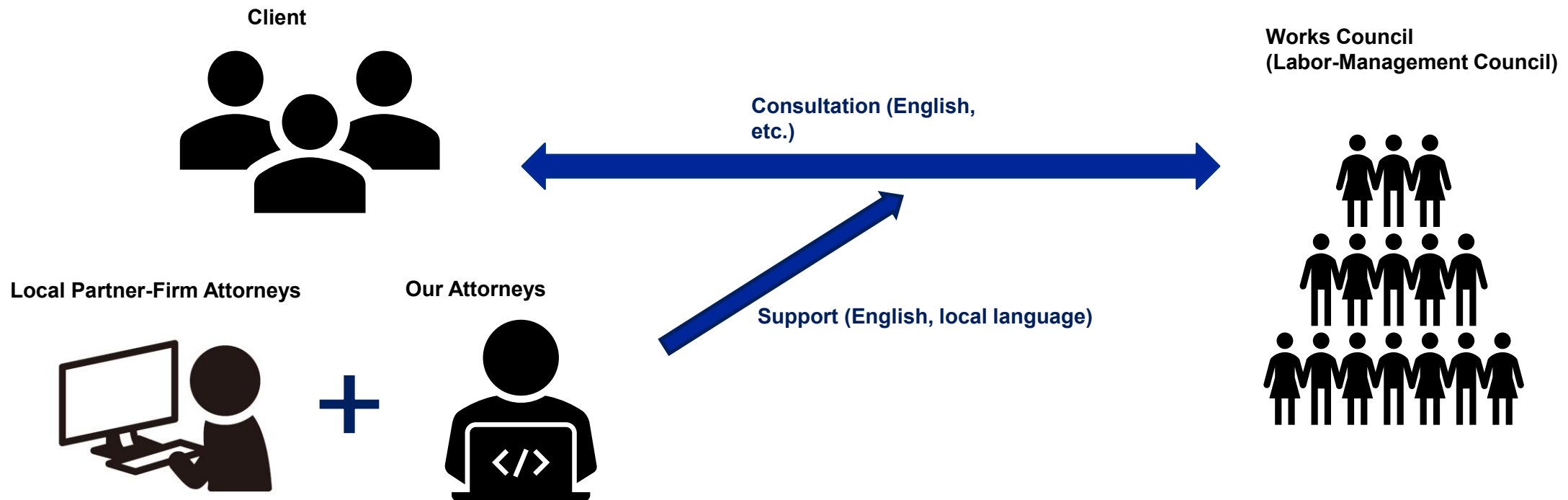
④ Compliance with the GDPR and Other National Data Protection Laws

Reporting hotline providers have a track record of complying with data protection laws around the world, including the GDPR. They also operate servers across the globe and can flexibly change server locations in response to regulations such as the GDPR.

④ Support for Consultation with Works Councils

We support consultation with Works Councils

Under the local laws of certain European countries, consultation with, or the agreement of, a Works Council may be required when introducing a whistleblowing system. In some cases, consultation with a Works Council can take several months, so legal support is essential.

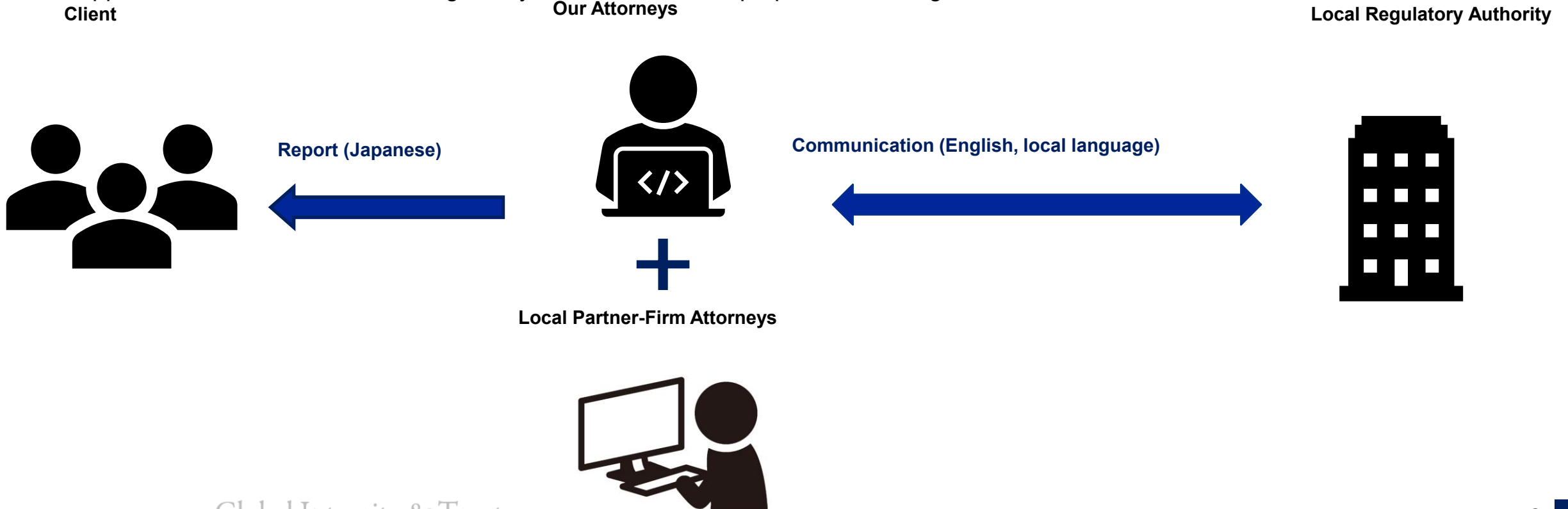


⑤ Support for Filings Required Under Local Law

We support filings with local authorities

Under local personal data protection laws, a filing with the local regulatory authority may be required when introducing a global whistleblowing system.

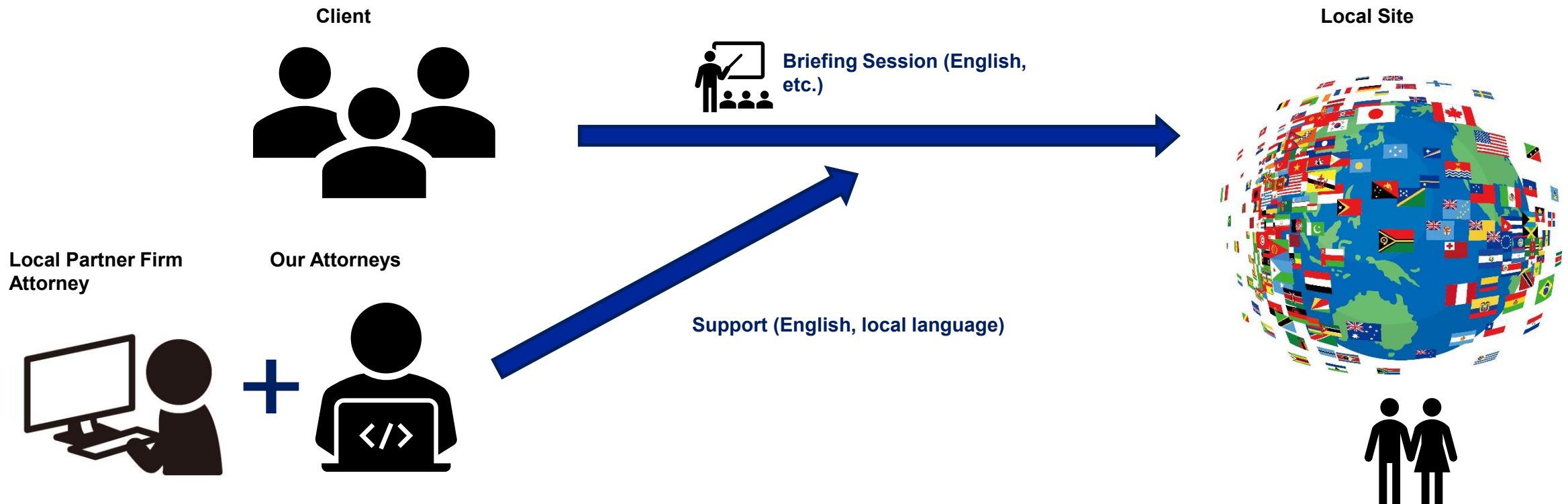
We support communication with local regulatory authorities and the preparation of filing documents.



⑥ Support for Local Briefing Sessions and Roll-out

We support local briefing sessions and roll-out

To effectively increase the number of reports, (1) raising awareness among local employees and (2) earning their trust are essential. The local briefing session, as the first point of contact with local employees, is therefore extremely important. Our firm provides full support for local briefing sessions and roll-out.





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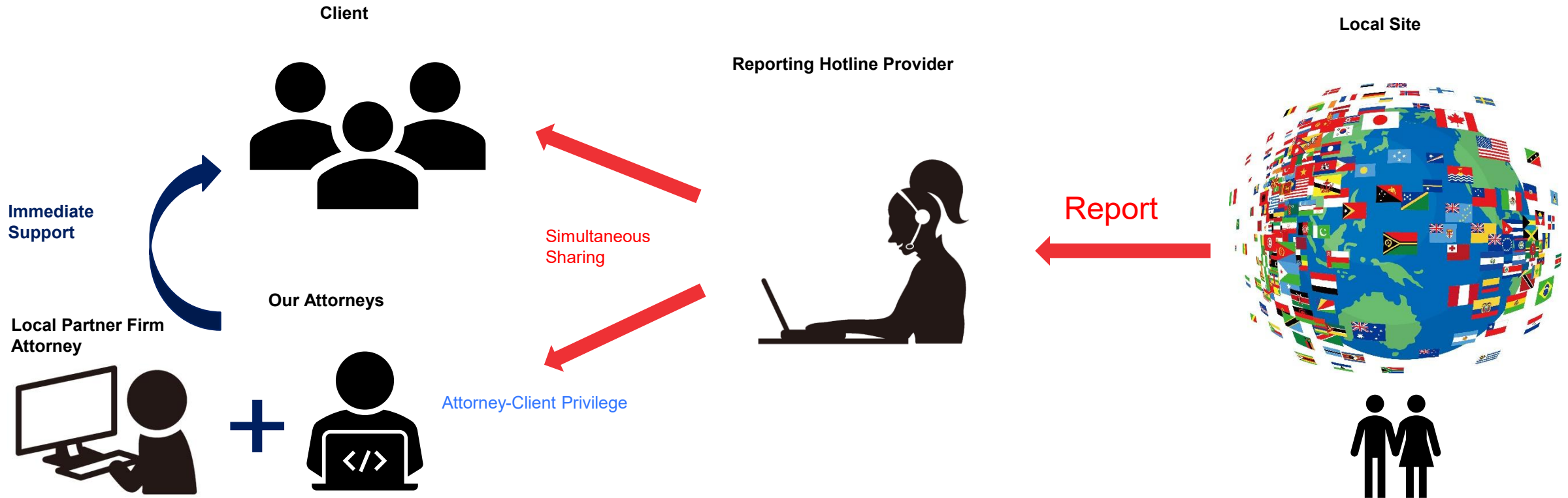
Operational Support

2. Operational Support

① Support Service for Handling Reports

Actual reports are shared with our attorneys at the same time as with the client, enabling immediate support

The initial response is the most critical part of handling any misconduct. Our firm has built a system in which report content is shared with us at the same time as with the client, so we can immediately support the initial response to help ensure it is not mishandled. Because our firm and local partner-firm attorneys respond in a coordinated manner, we can also address attorney-client privilege issues.

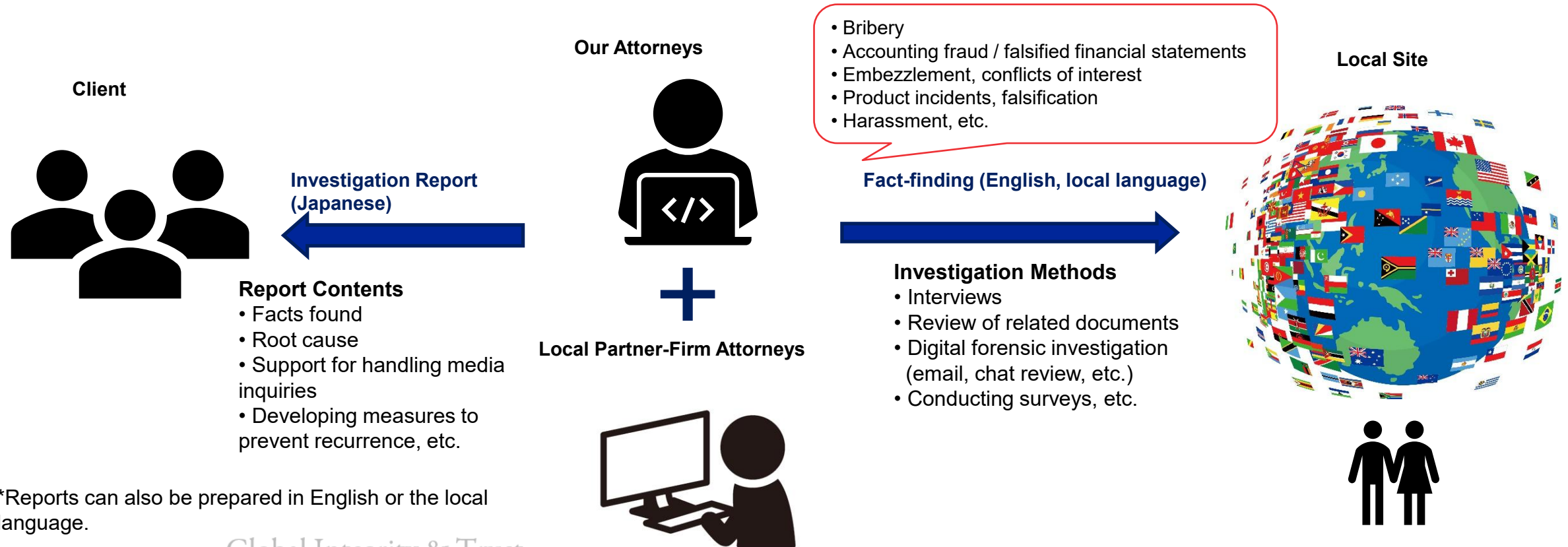


2. Operational Support

② Fraud/Misconduct Investigations

We conduct investigations into reported fraud and misconduct together with our local partner firms

Our firm handles everything consistently, from the initial response through fact-finding to the investigation report, enabling an efficient and effective investigation. We can also handle matters in English and local languages.

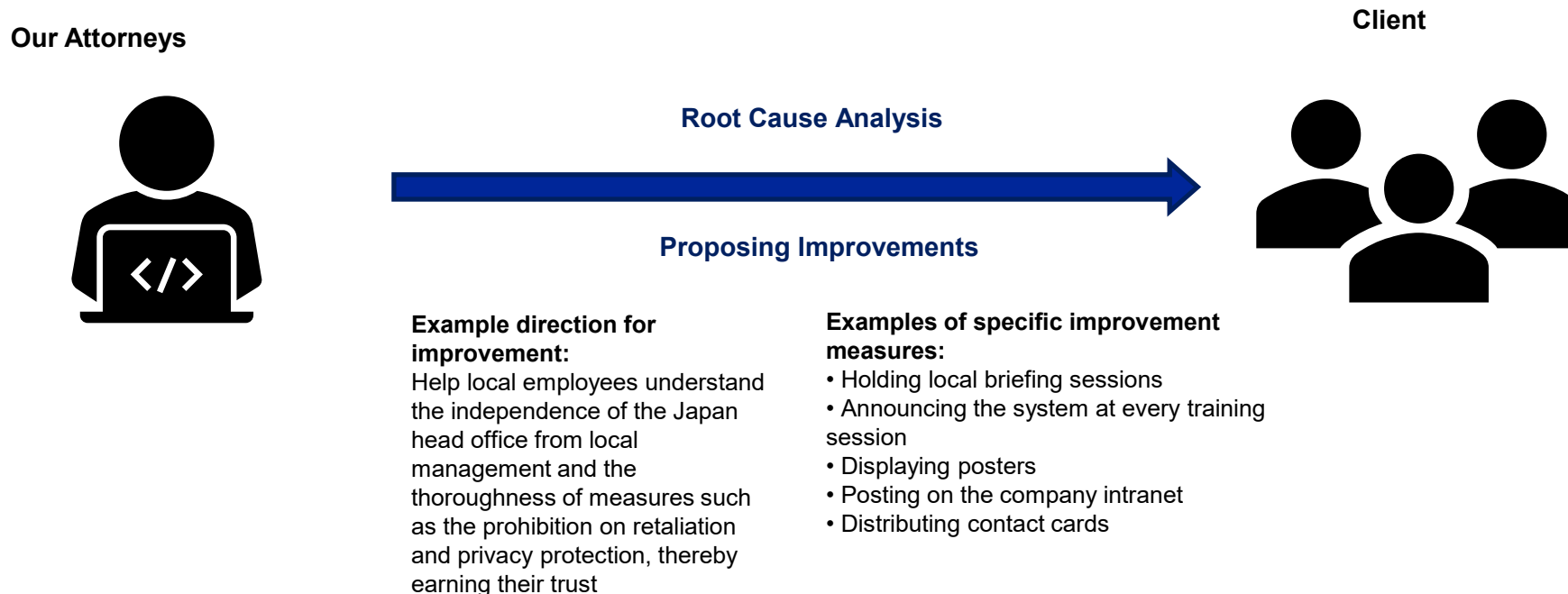


*Reports can also be prepared in English or the local language.

③ Reporting Consultation

We identify the reasons why the number of reports is not growing and provide consultation aimed at increasing this number

The main reasons why the number of reports fails to grow are generally: (1) insufficient awareness-raising, and (2) a lack of trust among local employees. Drawing on our firm's extensive experience, we will propose improvement measures tailored to the relevant cause.





That concludes this presentation.
Please contact us using the details [here](#).