

# **Whistleblowing application**

## **SD Whistle**

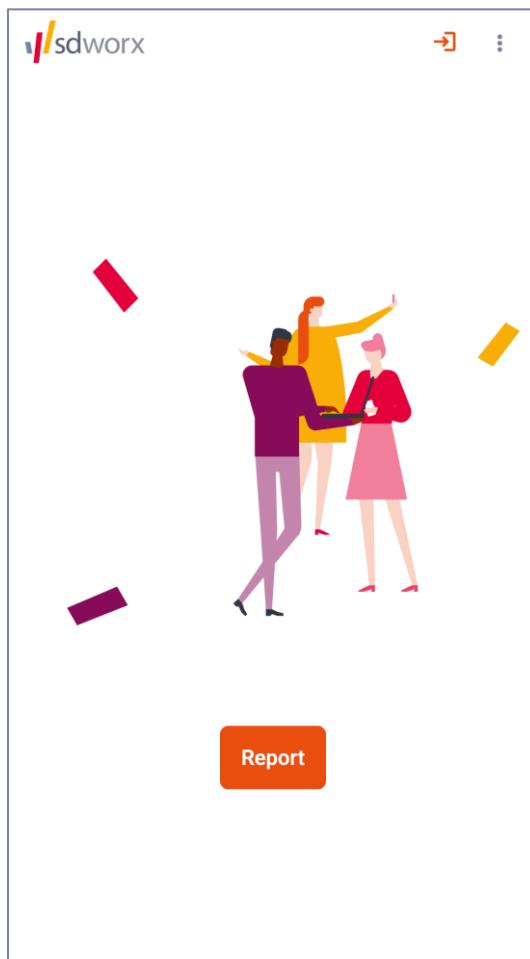
Manual

22/03/2023

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# 1. Manual for the Reporting Person

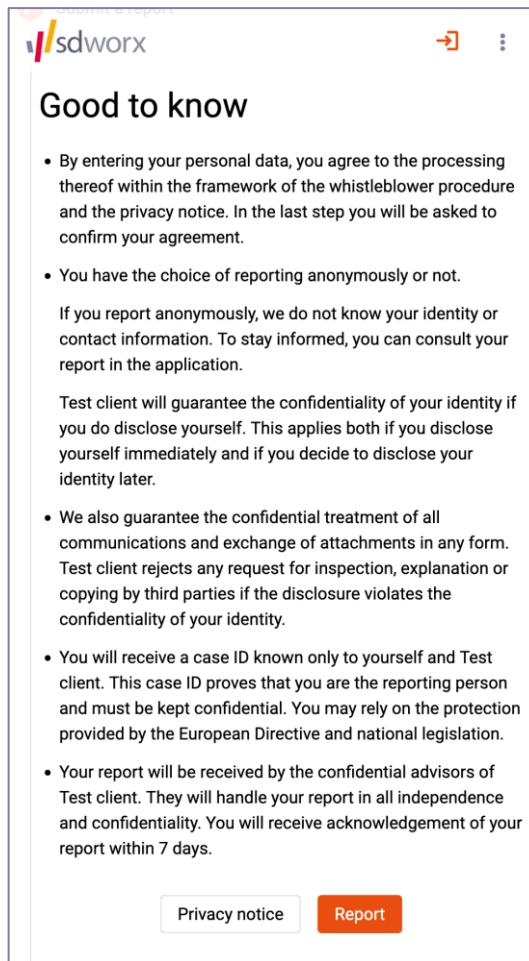
## 1.1 Submitting a report



The SD Whistle home page is available at [customer.sdwhistle.com](http://customer.sdwhistle.com).

The Reporting Person can create a new report via the 'Report' button and log in via the  button at the top right to access an existing report.

The 'Report' button directs the Reporting Person to the next screen:



The screenshot shows a mobile application interface for 'sdworx'. At the top, there is a navigation bar with a back arrow and a three-dot menu icon. The main content area has a title 'Good to know' and a list of bullet points. The text in the list is as follows:

- By entering your personal data, you agree to the processing thereof within the framework of the whistleblower procedure and the privacy notice. In the last step you will be asked to confirm your agreement.
- You have the choice of reporting anonymously or not.  
If you report anonymously, we do not know your identity or contact information. To stay informed, you can consult your report in the application.  
Test client will guarantee the confidentiality of your identity if you do disclose yourself. This applies both if you disclose yourself immediately and if you decide to disclose your identity later.
- We also guarantee the confidential treatment of all communications and exchange of attachments in any form. Test client rejects any request for inspection, explanation or copying by third parties if the disclosure violates the confidentiality of your identity.
- You will receive a case ID known only to yourself and Test client. This case ID proves that you are the reporting person and must be kept confidential. You may rely on the protection provided by the European Directive and national legislation.
- Your report will be received by the confidential advisors of Test client. They will handle your report in all independence and confidentiality. You will receive acknowledgement of your report within 7 days.

At the bottom of the screen, there are two buttons: 'Privacy notice' (in a light blue box) and 'Report' (in an orange box).

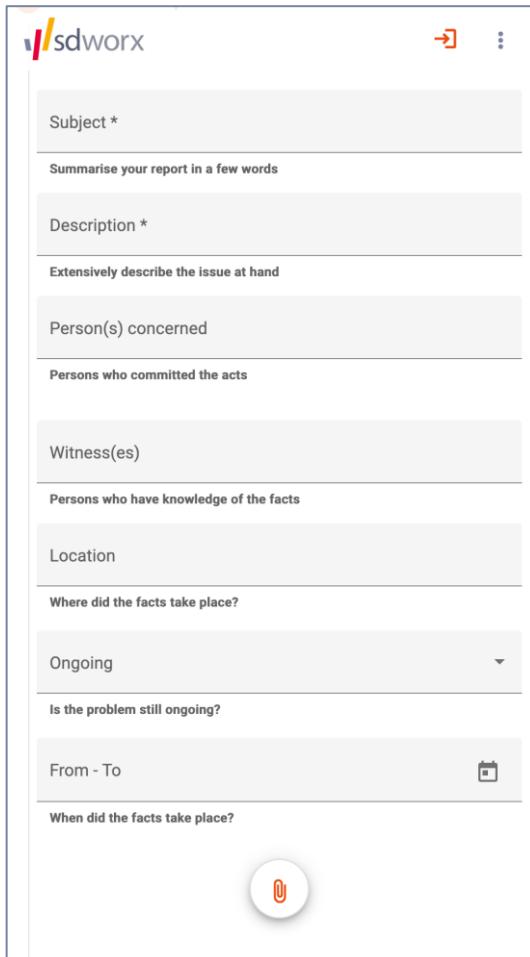
It is explained here that the Reporting Person has the choice of making a report anonymously or confidentially.

With an anonymous report, at no time is the identity of the Reporting Person requested by the application. Even in further communication, the identity remains fully protected.

In the case of a confidential report, the Reporting Person decides to enter his identity in the application. However, when dealing with the case, at no time may the identity of the Reporting Person be disclosed, except in the cases provided for by law.

## 1.2 Details of the report

After the Reporting Person clicks the 'Report' button, the application asks to enter the details of the report.



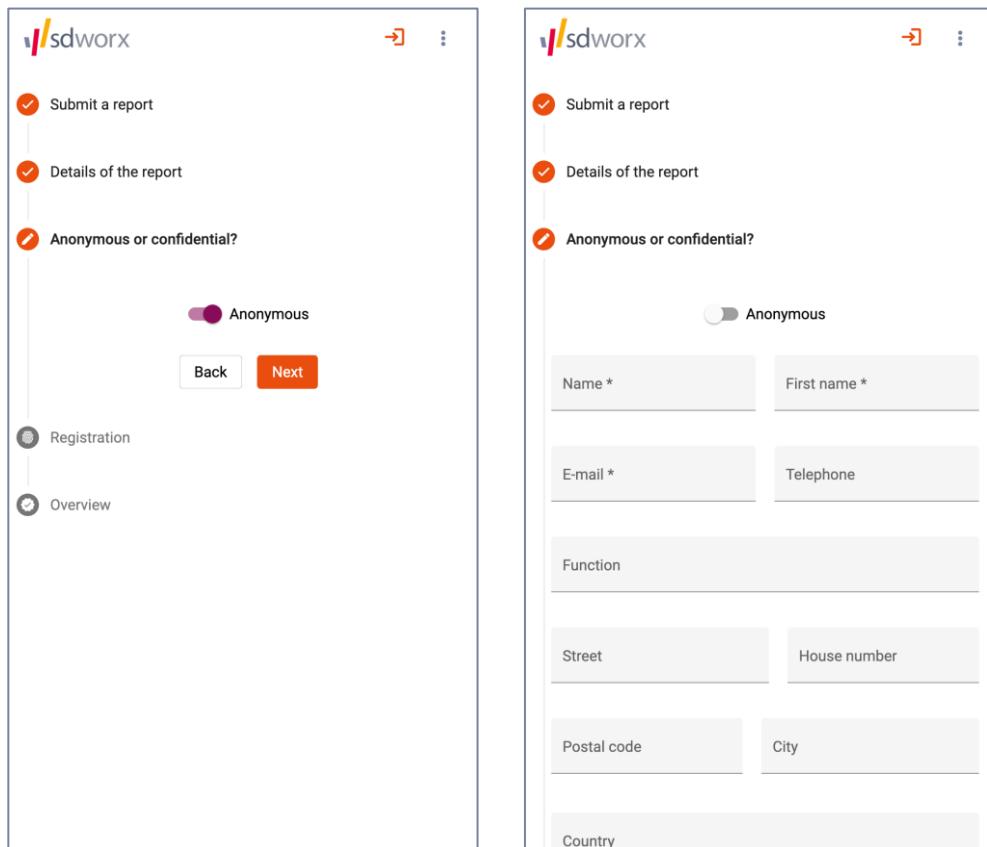
The screenshot shows a web-based reporting form titled 'sdworx'. The form is divided into several sections:

- Subject \***: A text input field with placeholder text 'Summarise your report in a few words'.
- Description \***: A text input field with placeholder text 'Extensively describe the issue at hand'.
- Person(s) concerned**: A text input field with placeholder text 'Persons who committed the acts'.
- Witness(es)**: A text input field with placeholder text 'Persons who have knowledge of the facts'.
- Location**: A text input field with placeholder text 'Where did the facts take place?'.
- Ongoing**: A dropdown menu currently set to 'Ongoing'.
- From - To**: A date picker input field with a calendar icon.
- When did the facts take place?**: A text input field with a small orange circular button containing a 'U' icon at the bottom right.

- **Subject:** The Reporting Person enters a title or subject for the report.
- **Description:** The Reporting Person gives a full description of the wrongdoing here.
- **Person(s) involved:** Here the Reporting Person can – if applicable – enter the persons concerned who are responsible for the breach.
- **Witness(es):** The Reporting Person can indicate who has knowledge of the facts, excluding himself.
- **Location:** In this free text box, the Reporting Person can indicate the location where the facts took place.
- **Ongoing:** This drop-down list allows the Reporting Person to specify whether the breach is ongoing or the breach is already over. A typical example is a dangerous situation in the workplace that has not yet been resolved.
- **From - To:** When did the facts take place? This date picker can be used to specify when the facts started and possibly ended.
- **Attachments:** The Reporting Person can add files that may support the report (e.g. photos, videos, Word or PDF files) using the attachment button at the bottom of the page.

## 1.3 Anonymous or confidential

On the next screen, a slider allows the Reporting Person to choose whether the report should be made confidentially or anonymously. In the case of an anonymous report, the Confidential Advisor will not receive any identifying information from the Reporting Person.



The application displays two versions of a step in the reporting process. The left version shows the 'Anonymous or confidential?' step with a slider set to 'Anonymous'. The right version shows the same step with the slider set to 'Confidential', which triggers a form for entering personal details. The right version includes fields for Name, First name, E-mail, Telephone, Function, Street, House number, Postal code, City, and Country.

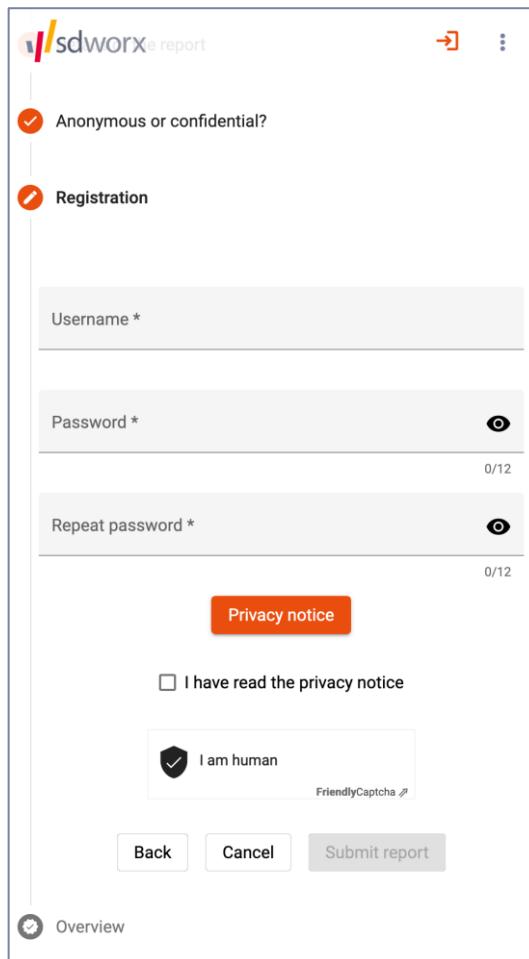
The application defaults to an anonymous report.

## 1.4 Account registration

In the next screen, the Reporting Person can choose a username with which to log into the application afterwards. The Reporting Person's username will be visible to the Confidential Advisor when the latter opens the report in the application. The Reporting Person chooses a strong password. The application will only accept sufficiently strong passwords.

For security reasons, the password cannot be recovered or reset if the Reporting Person forgets it. In this case, the Reporting Person must submit the report again.

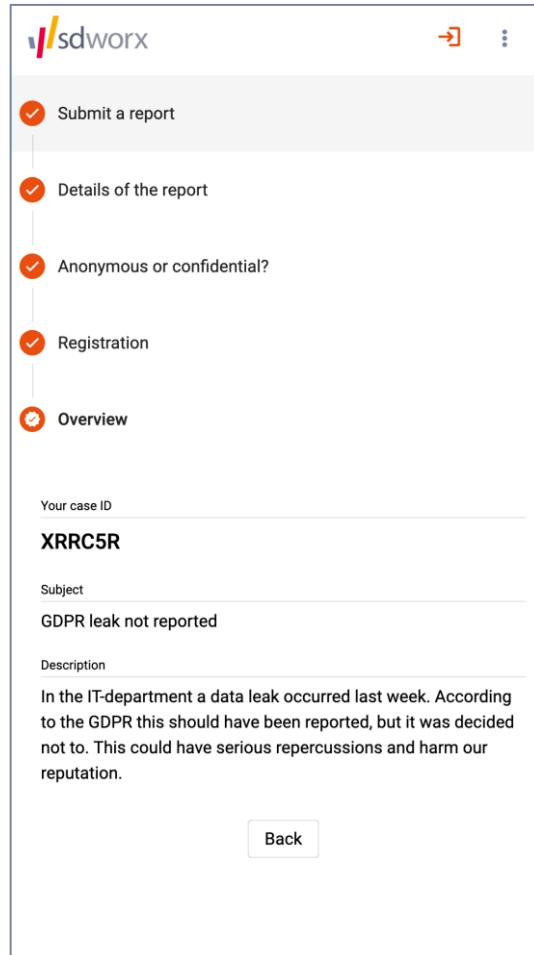
To submit a report, the reporter must agree to the privacy policy, which can be viewed here. An automatic *captcha* checks that the user is not a robot making false reports.



The screenshot shows the 'sdworx report' registration page. At the top, there are two buttons: a red one with a checkmark labeled 'Anonymous or confidential?' and a blue one with a crossed-out circle labeled 'Registration'. Below these are three input fields: 'Username \*', 'Password \*' (with a character count of 0/12), and 'Repeat password \*' (with a character count of 0/12). Each password field has an 'eye' icon for password visibility. A red button labeled 'Privacy notice' is positioned above a checkbox that says 'I have read the privacy notice'. Below the checkbox is a 'FriendlyCaptcha' box with a shield icon and the text 'I am human'. At the bottom, there are three buttons: 'Back', 'Cancel', and a grey 'Submit report' button. A link 'Overview' with a circular icon is located at the bottom left.

## 1.5 Overview

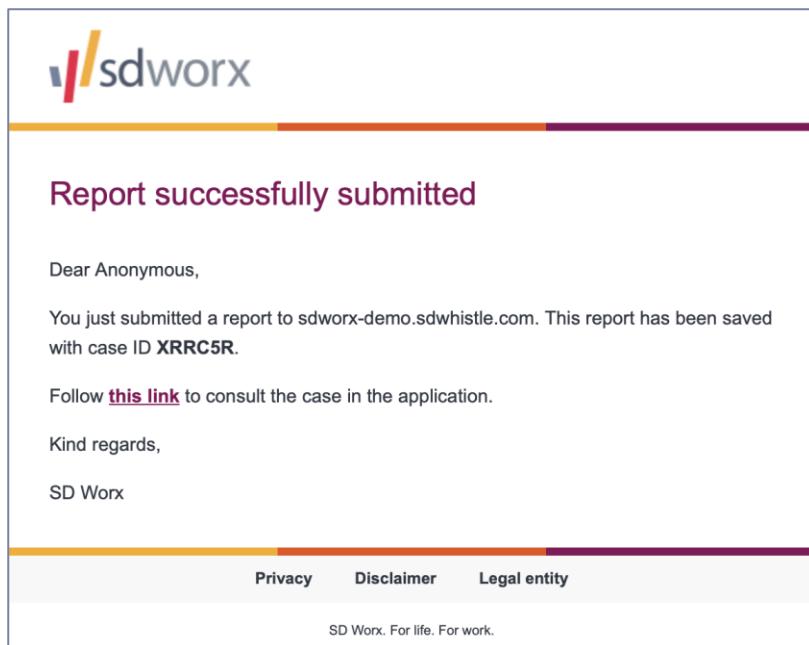
Once the report has been successfully received by the application, the Reporting Person will receive a summary of the report along with a unique case ID.



## 1.6 Consult a report

If the Reporting Person has reported confidentially, their email address is known and the application will send an email notification when there is a message for the Reporting Person. If the Reporting Person has reported anonymously, this is not possible and the Reporting Person will have to log in on their initiative to find out about any messages from the confidential advisor.

This email will contain the following message:



By following the link, the Reporting Person can log into the application and view the content of the communication. In this way, the Reporting Person can also send new messages and attachments to the Confidential Advisor.

The screenshot shows the sdworx application interface. At the top, there is a navigation bar with the sdworx logo, a 'My case' button, a user profile for 'Anonymous123', and a three-dot menu. Below the navigation, there is a section titled 'Participants' showing four users: Anonymous123 (Reporting person - test), David (Confidential advisor - test), Emma (Confidential advisor (admin) - test), and Sarah (Confidential advisor - test). The main content area shows a report detail. The subject is 'GDPR leak not reported' and the description is: 'The IT department had a data leak last week. According to GDPR, this should have been reported, but it was decided not to. This could have serious consequences and damage our reputation.' At the bottom of the report detail, there is a button 'I wish to remain anonymous'. The footer of the application says 'Anonymous123 @ Feb 21, 2023, 12:34:45 PM' and has a message input field with a send button.

## 2. Manual for the Confidential Advisor

### 2.1 Support

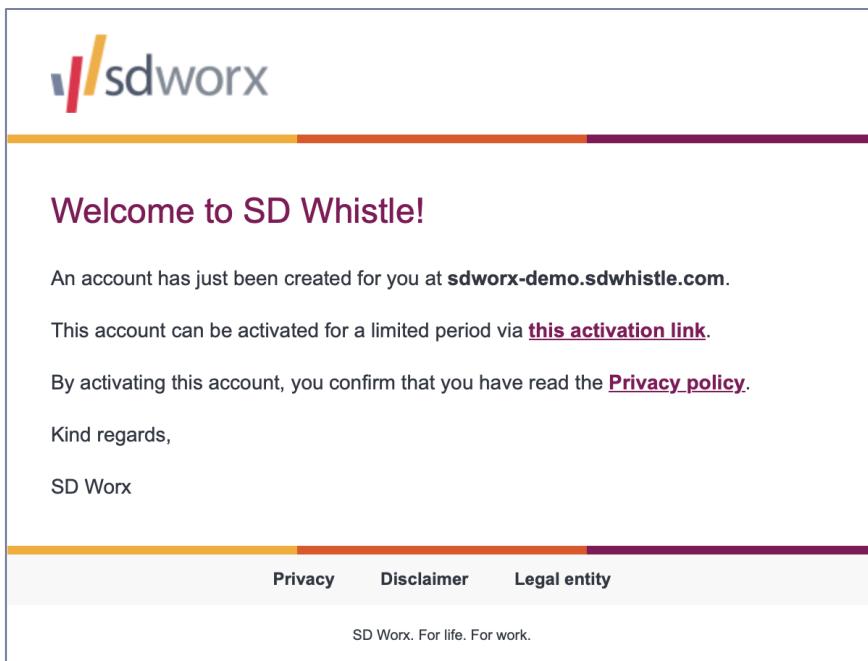
If you run into problems or if you have any questions, you can contact us by sending an e-mail to [marketplace@sdworx.com](mailto:marketplace@sdworx.com).

### 2.2 Roles and responsibilities

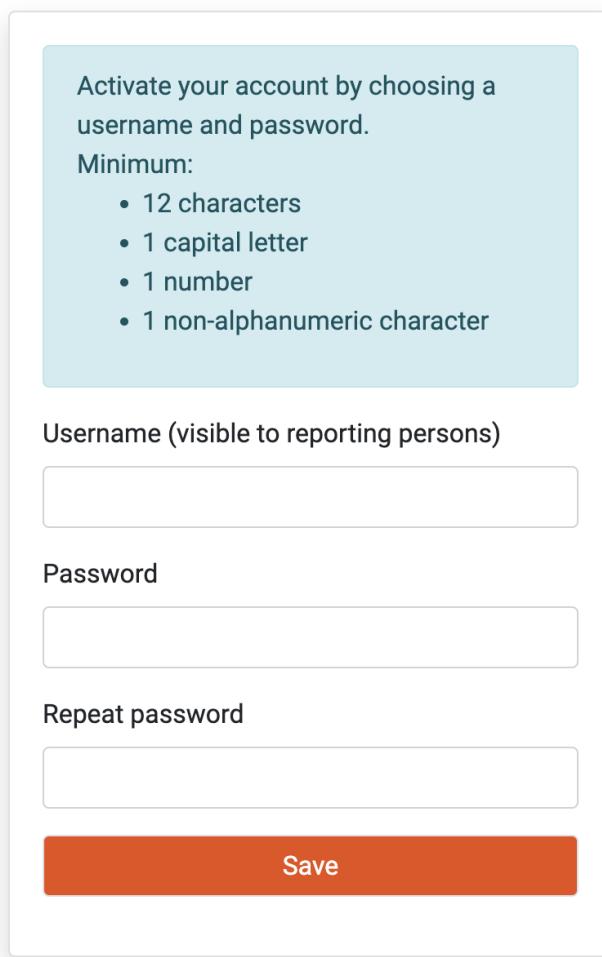
Two roles exist in the application: 'Confidential Advisor' and 'Confidential Advisor (admin)'. The Confidential Advisor can communicate with the Reporting Person and modify properties such as priority, status, title, etc. of a report. The Confidential Advisor (admin) can do everything the Confidential Advisor can do, plus manage users.

### 2.3 Account activation

The Confidential Advisor will receive an activation email with a unique link to activate the account:



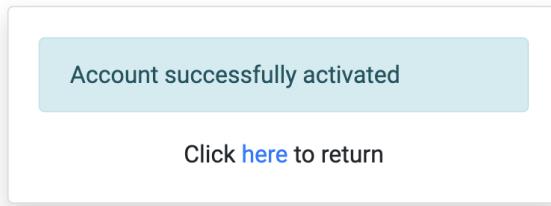
After clicking on the link, the Confidential Advisor will be taken to the activation screen where a username and strong password must be chosen. The username will be **visible to the Reporting Person** when they log into the system (see the last screenshot on page 8).



The image shows a user interface for account activation. At the top, a light blue box contains instructions: "Activate your account by choosing a username and password." Below this, the word "Minimum:" is followed by a bulleted list of requirements: "12 characters", "1 capital letter", "1 number", and "1 non-alphanumeric character". The main area of the screen contains three input fields: "Username (visible to reporting persons)" with an empty input box, "Password" with an empty input box, and "Repeat password" with an empty input box. At the bottom is a large orange "Save" button.

As the application may contain highly sensitive data, the security of this data is a top priority. Therefore, the application does not store passwords, even in *hashed form*. A lost password will result in a permanently inaccessible account. It is therefore **extremely important to remember your password**.

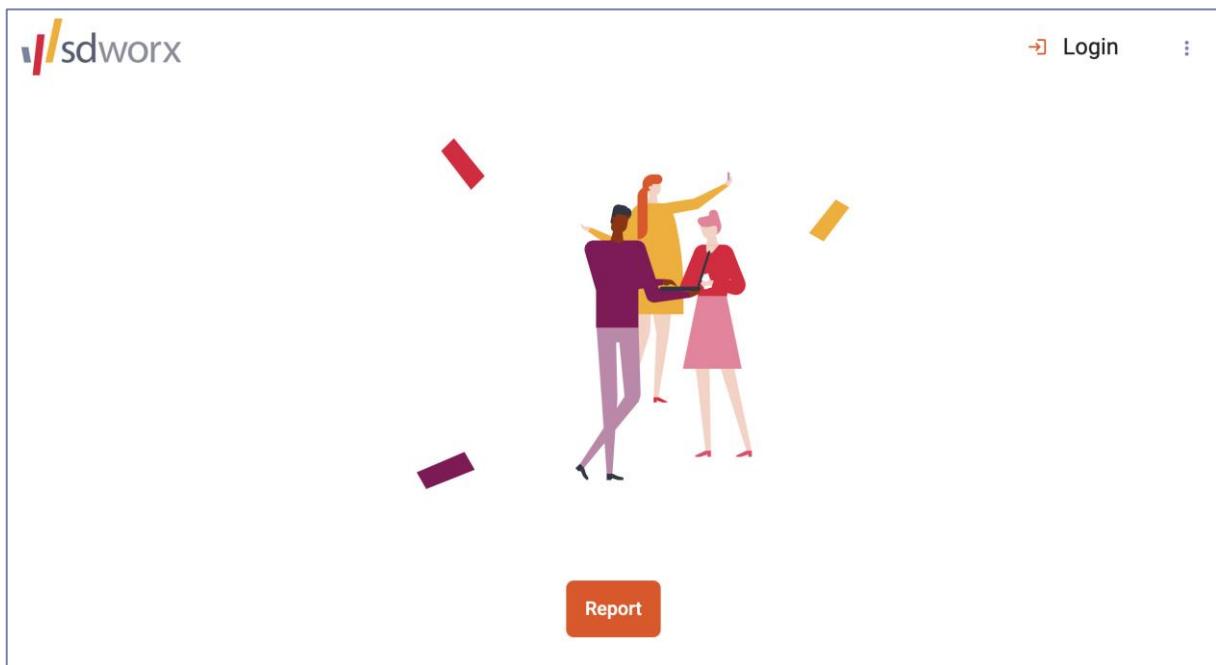
A message will then appear indicating that activation has been successful. The next step is for the Confidential Advisor to log in for the first time.



The image shows a message box with a light blue header containing the text "Account successfully activated". Below this, a white area contains the text "Click [here](#) to return".

Clicking on the 'here' link will take the Confidential Advisor back to the home page of the application.

To log in, use the button at the top right.



This will take the Confidential Advisor to the login page:

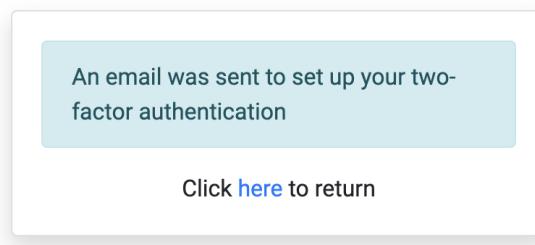
Login at Demo

Username

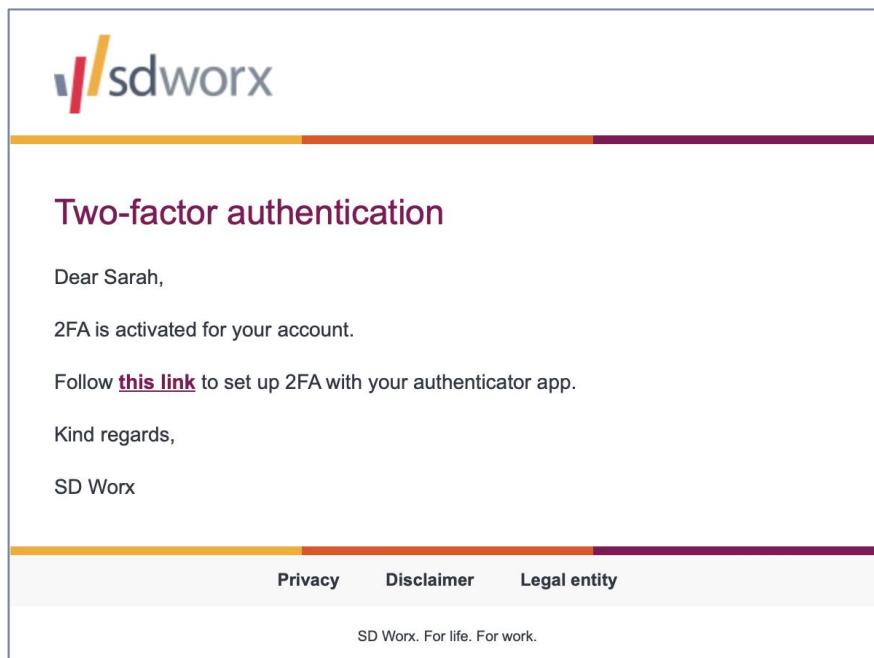
Password

**Login** **Cancel**

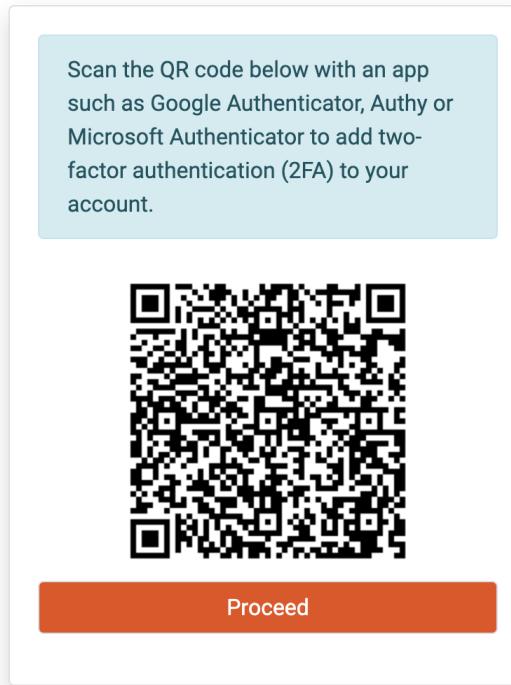
After the first login, the following screen will appear, indicating that two-factor authentication (2FA) has been enabled. The 2FA step is mandatory and cannot be disabled due to the sensitivity of the data.



This email looks like this and contains a link to enable two-factor authentication.

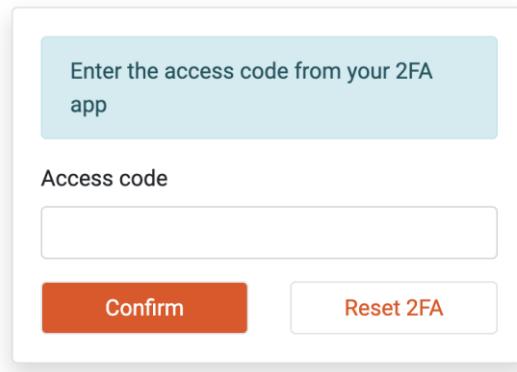


Following this link, the Confidential Advisor will need to log in again and will be taken to the following screen.



The Confidential Advisor installs an app such as Google Authenticator, Authy, Microsoft Authenticator, or an equivalent app on their smartphone. After scanning the QR code, the app displays a 6-digit code that refreshes every 30 seconds.

The next step is to enter the access code for the first time:

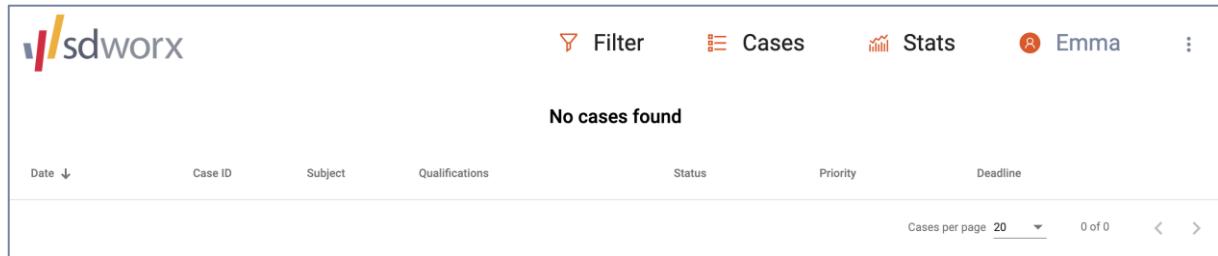


Enter the access code from your 2FA app

Access code

Confirm      Reset 2FA

The Confidential Advisor will then automatically enter the application:



sdworx

Filter   Cases   Stats   Emma

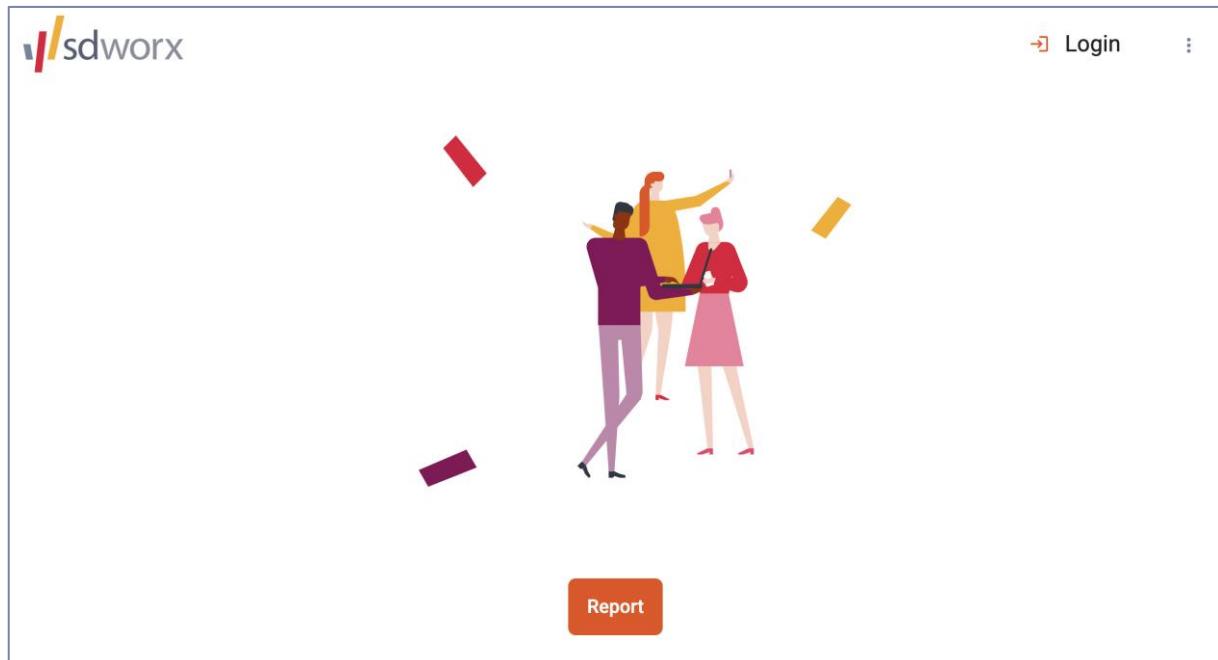
No cases found

Date ↓	Case ID	Subject	Qualifications	Status	Priority	Deadline
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Cases per page 20 0 of 0 < >

## 2.4 Login as Confidential Advisor

The application can be accessed via *client*.sdwhistle.com, where *client* is a self-selected abbreviation for the organisation.



sdworx

Login

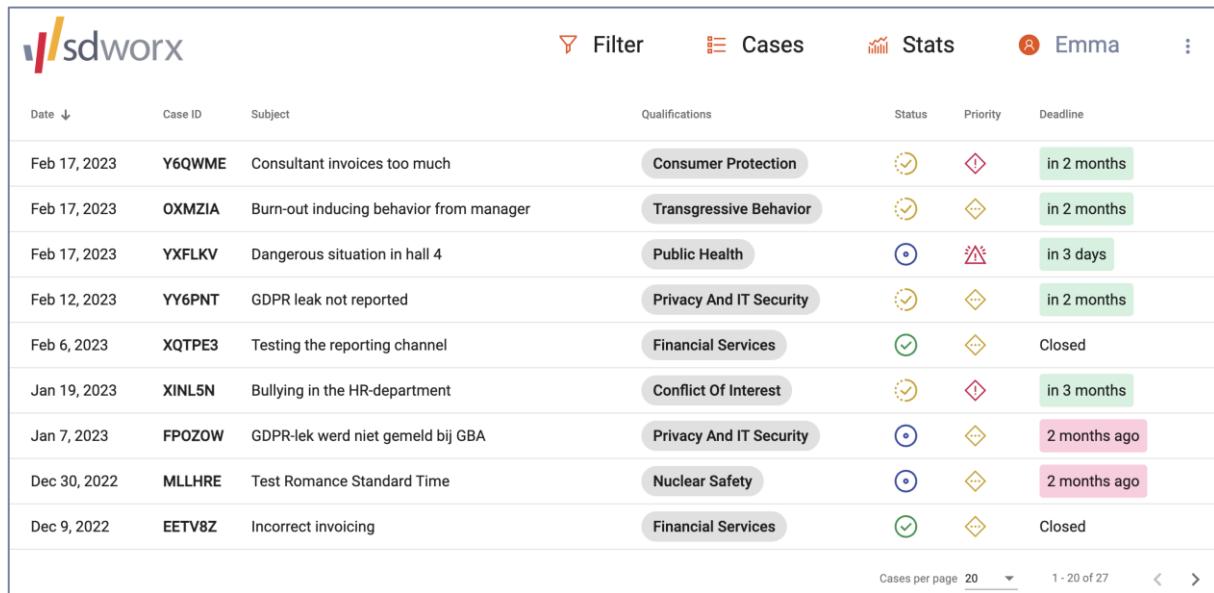


Report

The Confidential Advisor logs in to the application by clicking on the Login button in the top right-hand corner and entering the username and password, followed by the 2FA authentication code.

## 2.5 Case overview

After logging in, the Confidential Advisor is automatically taken to the case overview:



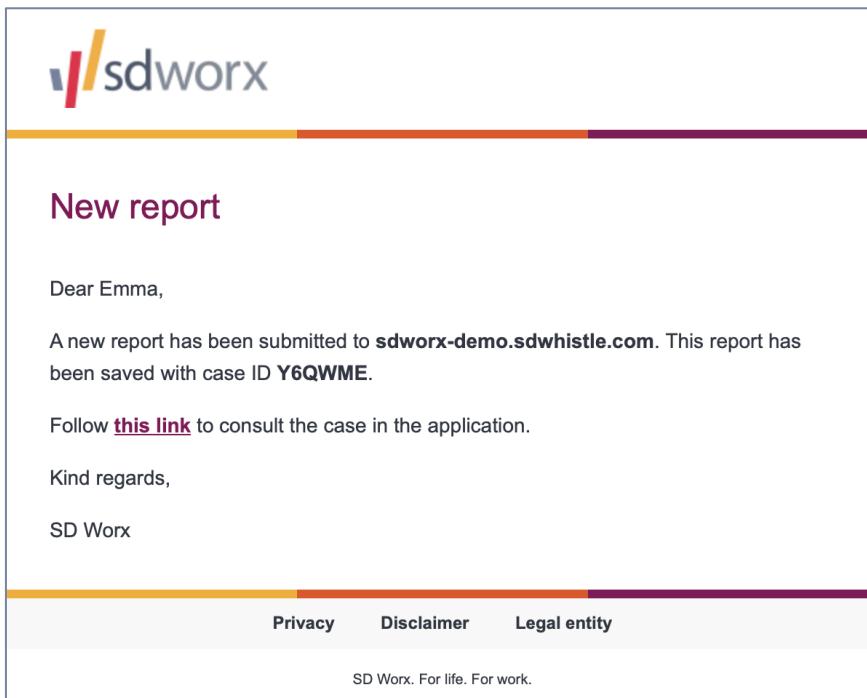
Date	Case ID	Subject	Qualifications	Status	Priority	Deadline
Feb 17, 2023	Y6QWME	Consultant invoices too much	Consumer Protection	<span>✓</span>	<span>!</span>	in 2 months
Feb 17, 2023	OXMZIA	Burn-out inducing behavior from manager	Transgressive Behavior	<span>✓</span>	<span>...</span>	in 2 months
Feb 17, 2023	YXFLKV	Dangerous situation in hall 4	Public Health	<span>○</span>	<span>⚠</span>	in 3 days
Feb 12, 2023	YY6PNT	GDPR leak not reported	Privacy And IT Security	<span>✓</span>	<span>...</span>	in 2 months
Feb 6, 2023	XQTPPE3	Testing the reporting channel	Financial Services	<span>✓</span>	<span>...</span>	Closed
Jan 19, 2023	XINL5N	Bullying in the HR-department	Conflict Of Interest	<span>✓</span>	<span>!</span>	in 3 months
Jan 7, 2023	FPOZOW	GDPR-lek werd niet gemeld bij GBA	Privacy And IT Security	<span>○</span>	<span>...</span>	2 months ago
Dec 30, 2022	MLLHRE	Test Romance Standard Time	Nuclear Safety	<span>○</span>	<span>...</span>	2 months ago
Dec 9, 2022	EETV8Z	Incorrect invoicing	Financial Services	<span>✓</span>	<span>...</span>	Closed

The application displays some useful information per report, such as report date, case ID, subject, status, priority, and deadline.

The filter function in the top menu allows you to limit the case view to only those reports that meet the specified parameters.

## 2.6 Receiving a report

When a report is made, the Confidential Advisor will receive an email with the following message:



A direct link takes the Confidential Advisor (after logging in) to the case page of the report:

Communication with the Reporting Person is visible in the middle. The Confidential Advisor can communicate with the Reporting Person via chat messages.

## 2.7 Customise report properties

On the left-hand side of the screen are the report properties, the following of which can be modified by the Confidential Advisor:

- Description
- Qualifications
- Status
- Priority
- Location

Changes to the report properties must be saved using the  button.

All changes to the case are logged in the centre of the screen. This log provides an audit trail of the case's progress. This is an integral part of the integrity of the process. This audit trail is, of course, not visible to the reporting person. Only the messages sent by the Confidential Advisor to the Reporting Person are visible to the Reporting Person.

## 2.8 Sending an acknowledgement receipt to the Reporting Person

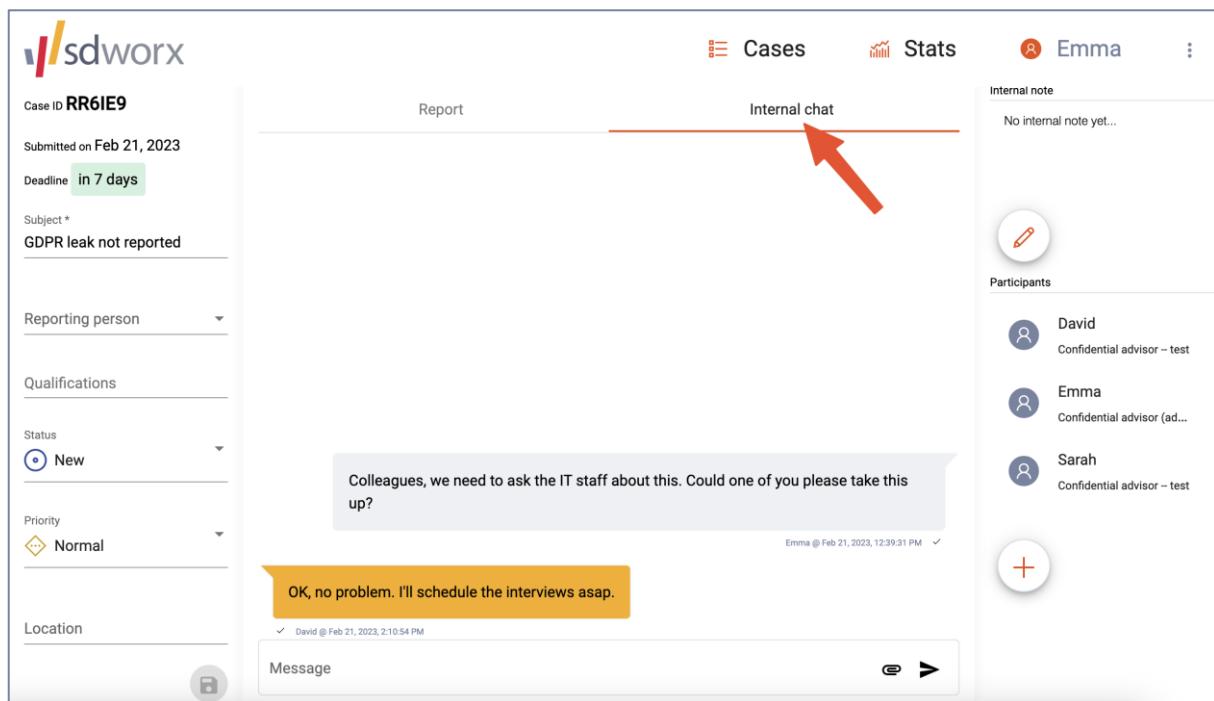
The Confidential Advisor will acknowledge the proper receipt of the report in the first communication to the Reporting Person. This must be done within 7 days in accordance with the Whistleblowing Directive 2019/EC/1937. This deadline is automatically tracked by the application in the top left-hand corner of the case screen.

Once the Confidential Advisor has replied to the Reporting Person, the application automatically changes the status from 'New' to 'In process'. In addition, once the report is received, the deadline for its resolution is automatically set to 3 months, in compliance with the Directive.

## 2.9 Encrypted communication with other Confidential Advisors

Email communication between Confidential Advisors about confidential reports should be avoided as this is not a secure communication channel.

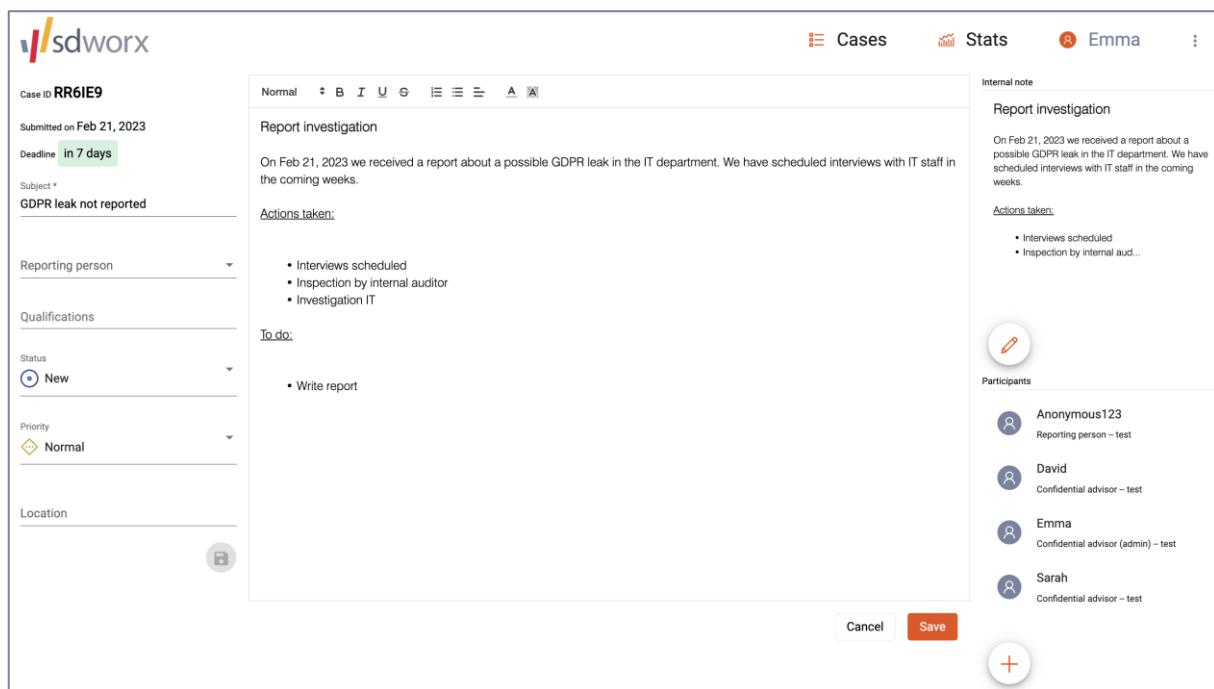
The application provides a chat function with the other Confidential Advisors. This chat is encrypted and cannot be accessed by third parties.



The screenshot shows the sdworx application interface for managing reports. On the left, there is a sidebar with fields for Case ID (RR6IE9), Submission date (Feb 21, 2023), Deadline (in 7 days), Subject (GDPR leak not reported), Reporting person, Qualifications, Status (New), Priority (Normal), and Location. The main area has tabs for Report and Internal chat. The Internal chat tab is highlighted with a red arrow. A message from Emma is visible: "Colleagues, we need to ask the IT staff about this. Could one of you please take this up?". David replies: "OK, no problem. I'll schedule the interviews asap." The right sidebar shows participants: Emma (Confidential advisor - test), David (Confidential advisor - test), and Sarah (Confidential advisor - test). There is also a plus sign icon to add more participants.

## 2.10 Internal note

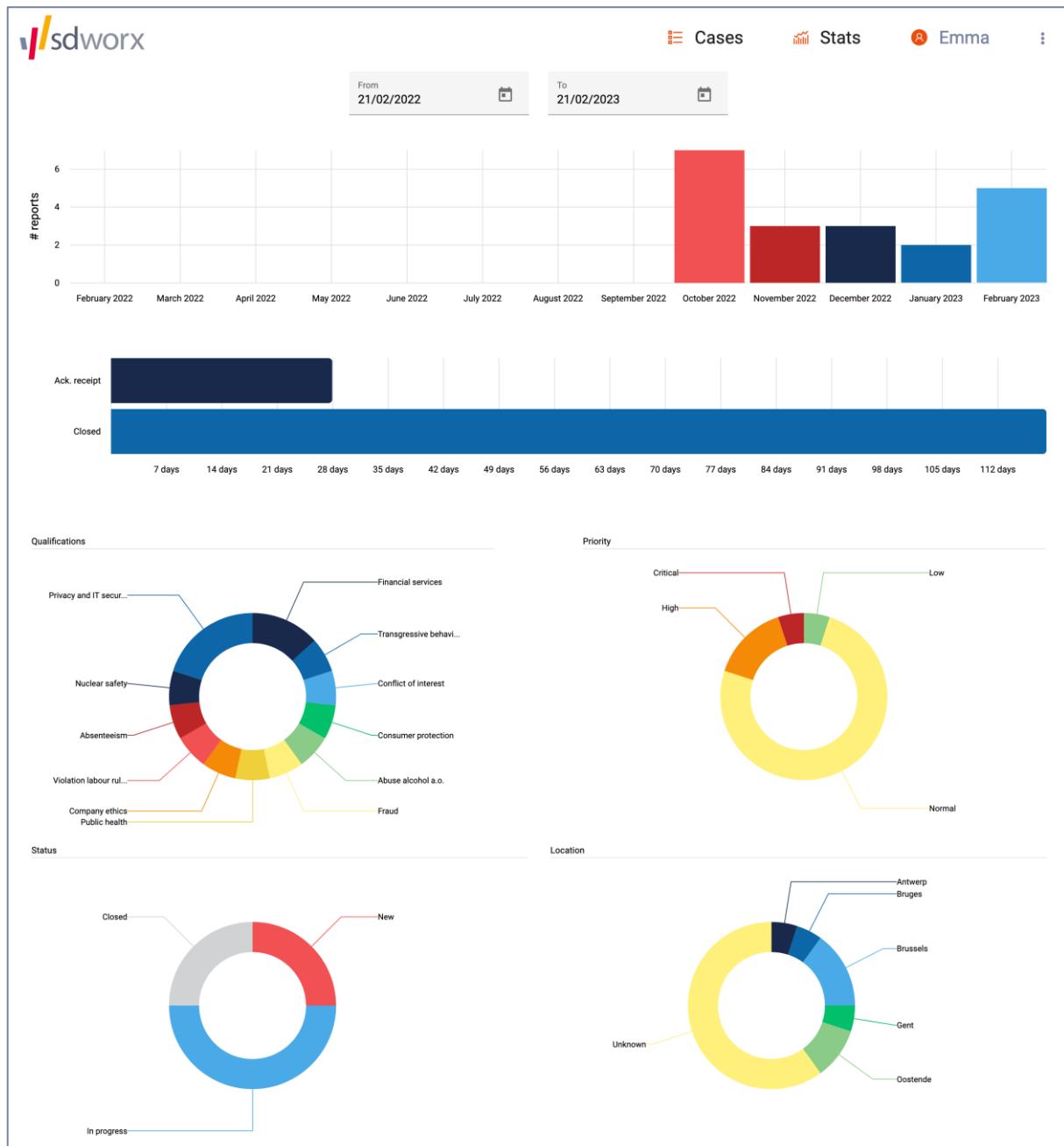
For each case, the Confidential Advisor can annotate their notes or those shared with other Confidential Advisors via 'Internal note' in the top right-hand corner. After clicking on the  icon, a text editor will appear in the centre of the screen. After entering or modifying the text, the internal note must be saved using the 'Save' button at the bottom.



The screenshot shows the sdworx software interface for managing cases. On the left, there is a sidebar with various case details: Case ID RR6IE9, Submitted on Feb 21, 2023, Deadline in 7 days, Subject \* GDPR leak not reported, Reporting person, Qualifications, Status (New), Priority (Normal), and Location. The main content area displays a case titled "Report investigation". The text in the case states: "On Feb 21, 2023 we received a report about a possible GDPR leak in the IT department. We have scheduled interviews with IT staff in the coming weeks." Below this, there are sections for "Actions taken:" (listing Interviews scheduled, Inspection by internal auditor, and Investigation IT) and "To do:" (listing Write report). On the right side, there is a sidebar titled "Internal note" which contains the text "Report investigation" and "On Feb 21, 2023 we received a report about a possible GDPR leak in the IT department. We have scheduled interviews with IT staff in the coming weeks." Below this, there is a section titled "Actions taken:" with the same list of actions. A "Participants" section lists four users: Anonymous123 (Reporting person - test), David (Confidential advisor - test), Emma (Confidential advisor (admin) - test), and Sarah (Confidential advisor - test). At the bottom right of the interface, there are "Cancel" and "Save" buttons, and a "New" button with a plus sign.

## 2.11 Statistics

The Confidential Advisor can get an overview of the cases he has access to via 'Stats' in the top menu.

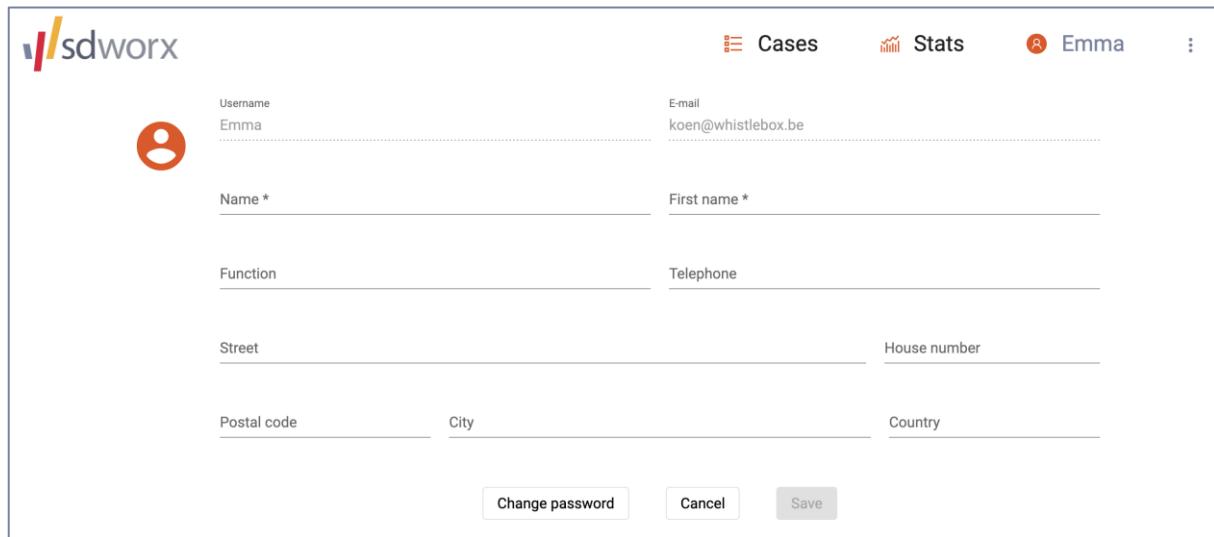


The 'From' and 'To' dates at the top of the page allow you to select the period for which the statistics are to be calculated.

The statistics contain a range of interesting data, including the average time it took the Confidential Advisors to comply with the deadlines as foreseen in the Directive.

## 2.12 Profile page

The Confidential Advisor can edit their profile by clicking on their name in the top right-hand corner.



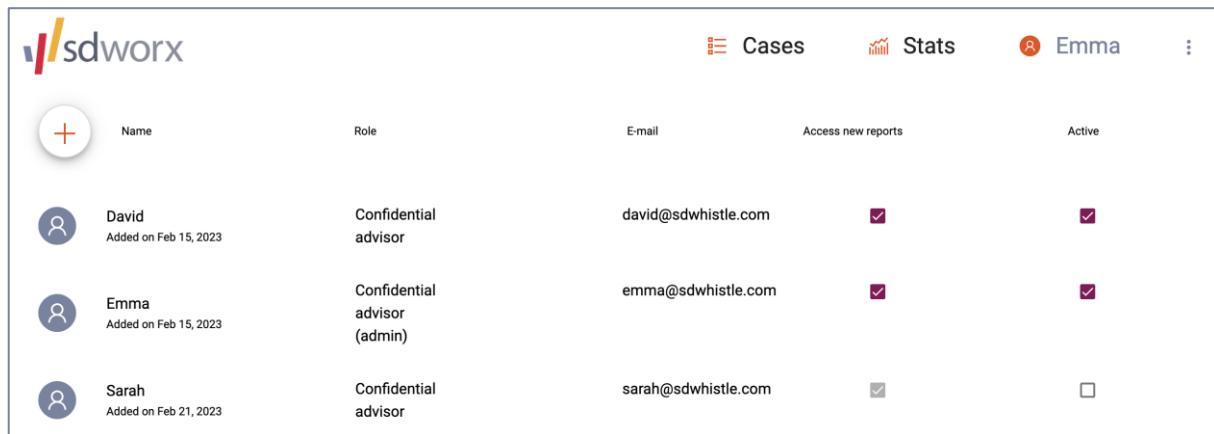
The screenshot shows the sdworx profile page. At the top, there is a navigation bar with the sdworx logo, a search bar, and links for 'Cases', 'Stats', and 'Emma'. The 'Emma' link is highlighted with a red circle. The main area is a form for editing profile details. It includes fields for 'Username' (Emma), 'E-mail' (koen@whistlebox.be), 'Name \*' (Name and First name), 'Function', 'Telephone', 'Street' (Street and House number), 'Postal code', 'City', and 'Country'. At the bottom are 'Change password', 'Cancel', and 'Save' buttons.

Here, the Confidential Advisor can add their profile picture, complete their personal details and change their password.

Only the username is visible to the Reporting Person.

## 2.13 User management

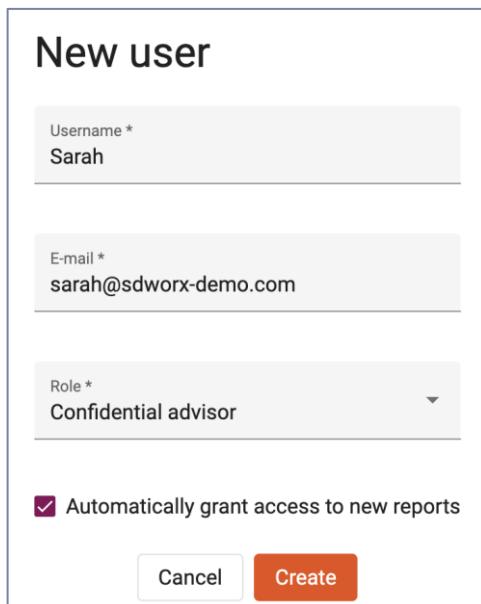
Click on the three vertical dots at the top right to access the 'Users' menu. This page lists the users who have access to the application.



	Name	Role	E-mail	Access new reports	Active
	David Added on Feb 15, 2023	Confidential advisor	david@sdwhistle.com	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Emma Added on Feb 15, 2023	Confidential advisor (admin)	emma@sdwhistle.com	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Sarah Added on Feb 21, 2023	Confidential advisor	sarah@sdwhistle.com	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Users with the 'Confidential Advisor (admin)' role can:

- invite users using the  button in the top left-hand corner;



New user

Username \*  
Sarah

E-mail \*  
sarah@sdworx-demo.com

Role \*  
Confidential advisor

Automatically grant access to new reports

- grant users automatic access to new reports via the checkbox in the 'Access new reports' column;
- (de)activate users via the checkbox in the 'Active' column.

## 2.14 Language selection

In the same menu, under the three vertical dots, the language can be changed.

This does not affect the reporter's choice of language. Their reporting portal will still work in their chosen language.