

# Speak-up culture

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## The culture of speaking up and standing up



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## Foreword

As a result of the acceleration of changes, the VUCA approach, exponential growth, agile work methods, and the appearance of Generations Y and Z in the labour market, the focus of organisations has shifted significantly, and new approaches, management challenges, and solutions have started to appear in organisations. The previous customer focus has been replaced by the CX approach; demand-based sales by digital demand building and mass customisation; CRM by the persona; and managerial authority by the employee experience. The personal well-being of employees at the workplace has become crucial. It is almost inevitable that these new value structures also appear in the formation of organisational cultures. This places managers in a new role and also creates new competence expectations. These are the following:

- strengthening diversity
- responding to social issues
- managing changes/modern organisational culture
- ethical corporate management—ensuring compliance.

At the request of HBLF, we have revealed existing practices during interviews conducted among HBLF members. Based on this and studying the analyses of other good practices, we have compiled our recommendations.

**We want to thank the employees of Shell Hungary zRt., HEINEKEN Hungária Sörgyárak Zrt., Magyar Telekom Nyrt., E.ON Hungária Energetikai Zrt., Avis Budget Group BSC Kft., Abacus Medicine Hungary Kft., LeasePlan Hungária Zrt. and BP Business Service Centre Kft. for their cooperation, openness, and unconditional support of the topic.**



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We conducted an international and Hungarian literature review to prepare the study, primarily on corporate culture, psychological safety, and speak-up culture. We also used the desktop research method to study the regulatory system of Hungarian and international organisations implementing the culture of speaking up and standing up, the tools and methods of implementation, and the online experiences of these companies.

We conducted semi-structured interviews with company experts involved in the topic to gain insight into the practices of companies where such a system is already in place and also to obtain information about what those companies where the new practice has not yet been introduced would consider necessary to do so.

We have processed interviews thematically. We conducted ten online interviews, most of them at foreign-owned companies. Our study focused on the company’s internal conditions and did not analyse handling notifications from external partners. The results do not give a complete corporate overview of the speak-up culture in Hungary.

It is important to emphasise that every organisation is different since, if nothing else, organisational culture and customary law can contain different criteria; therefore, before application, we strongly recommend customising the study’s recommendations and completing area- and company-specific additions and modifications.

## Content

- Foreword**..... 2
- I. Regulatory framework** ..... 2
- II. About speak-up culture in general** ..... 2
  - Characteristics of speak-up culture**..... 3
  - Organisational connections**..... 4
- III. Introducing a speak-up culture: building blocks of the process**..... 5
  - 1. Preparation** ..... 5
  - 2. Regulation**..... 8
  - 3. Development of reporting channels**..... 9
  - 4. Feedback – transparency** ..... 10
  - 5. Monitoring**..... 11
  - 6. Training** ..... 11
  - 7. Communication**..... 13

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## I. Regulatory framework

Directive (EU) 2019/1937 of the European Parliament and the Council entered into force in December 2019, creating a new system to protect and encourage reporting workplace misconduct and law violations. In line with this, organisations must make it possible to report violations even anonymously and the transparent follow-up. The directive proposes the establishment of easily accessible reporting channels and emphasises the obligation of confidentiality and the prohibition of retaliation against persons reporting violations. The member states had until 17 December 2021 to incorporate the directive into their legal system and put it into effect for state-owned enterprises, local governments with more than 10,000 residents, and enterprises operating in the private sector employing more than 250 employees. From 17 December 2023, this also applies to companies operating in the private sector employing 50 and over 249 employees.

Countless other laws support the freedom of speech and individual representation of interests. We only mention two of them.

According to the Charter of Fundamental Rights of the European Union, born in 2000 and amended in 2012, “(1) Any discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited”.

Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities supplements what is listed in the Charter of Fundamental Rights with the prohibition of discrimination due to the part-time nature or fixed duration of the employment relationship or other work-related legal relationship, and due to membership in an interest representation. It is important that the law distinguishes between direct and indirect discrimination.

## II. About speak-up culture in general

Dictionaries have different suggestions for the term “speak up”. At the interviewed companies, the topic was either simply labelled “speak up”, or we came across the words “the culture of speaking up and standing up”.

As an organisational cultural element, **the culture of speaking up and standing up** is a workplace culture that encourages employees to feel free to ask their questions, give feedback, and express their concerns about certain issues without having to fear any negative consequences for them.

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## Characteristics of speak-up culture

It is a huge potential for development and innovation if the organisation can correct its operations based on the comments of its colleagues and partners, constantly correct errors, and see and implement development opportunities. The company's reputation improves, latencies and losses decrease, and trust in the organisation increases both in the external and internal environment. A culture that is open to opinions helps to show the untapped potential inherent in the organisation and promotes things to become better and better. Colleagues are the ones who are the first to notice when things are working incorrectly or not in the most efficient way in practice. For employees, the culture of speaking up and standing up creates the opportunity to mobilise their resources—not just their labour—for the sake of the organisation, strengthening commitment and responsibility for how things are going.

Where we encountered the proper functioning of the speak-up culture, the characteristic was an open organisational culture, diversity and inclusion were among the core values, and countless forums allowed employees to express their opinions and provide management feedback.

A successful organisation manages most problems informally. If any comments arise, they can be handled at the interpersonal communication level.

Important elements of a well-functioning speak-up system:

- workplace values and management attitude/quality,
- management training,
- organisational culture,
- need to create psychological safety.

**SHELL** tackles the promotion of speak-up culture as a priority in Hungary too. They apply an integrated approach to this issue: in their Codes of Ethics, it is listed among the values. They have focused on the issue of psychological safety, “learner mindset” has been incorporated into management competencies and management training as well, and employees are asked to provide feedback on this issue in the framework of the annual engagement surveys.

Employees demand such attitude from the managers which can serve as a good example. This is particularly the case for issues concerning values, when the organisation takes a stand and stands up for the protection of certain values not only by paying lip service to them, but by credible managerial attitude which can be experienced on a daily basis.

The parent company of **HEINEKEN Hungária** is a Dutch company well known for its exemplary openness and tolerant culture, and therefore they place special emphasis on the establishment of a culture of speaking up and standing up, and on the preparation and implementation of the relevant processes. The company makes awareness-raising a priority. They saw the key to success in making managers and

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staff receptive before the system was launched. Since then, they have been shaping open-mindedness on an ongoing basis, whereas better understanding is served through a variety of creative training sessions, such as case studies to learn ethical principles and put them into practice.

Open-door policy is not the same as speak-up culture

Open-door policy sets the conditions for the accessibility of the managers, however, it does not encourage it actively that the employees should overcome their reservations and fear of consequences. In addition to the personal openness of the managers and open doors, the inner obstacles of the employees deriving from the fear of consequences and the feeling of futility have to be lifted by building confidence and creating psychological security.

Following the managers is not the same as trusting the managers.

Below is a non-exhaustive list of what behavioural elements confidence building can have:

- authentic communication on the part of the managers (truthfulness and honesty),
- treating the employees with respect (regardless of their specific job),
- transparency, accessibility, and accountability,
- acknowledging and correcting mistakes,
- continuous improvement and training,
- credibility—undertaking the reality of the situation,
- openness towards the viewpoint of others,
- keeping the commitments and promises,
- meeting the expectations,
- trusting in others,
- as part of a healthy workplace, doing what is professionally and ethically right.

Anonymous feedback prevents openness

By ensuring the possibility for employees to provide anonymous feedback, we would like to encourage the honest and unbiased expression of opinions, however, this sends another message as well: the culture is not open enough to embrace and share your opinion within the organisation.

Establishing or strengthening a feedback culture allows to create an open workplace atmosphere. It is part and parcel of the behavioural aspects of the managers, the employee trainings, and meeting culture.

## **Organisational connections**

The culture of speaking up and standing up is connected to the competences in the field of human resources through addressing the issues concerning organisational values and organisational culture, the training of employees and managers and the maintenance of their relations, and the monitoring of employee commitment.

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The other major field of competence comprises the addressing of compliance issues concerning the laws and internal governing principles themselves and ensuring the ethical and compliance functioning. This involves that this field also addresses the issues regarding the effective operation of speak-up and stand-up processes.

One aim of establishing a culture of speaking up and standing up can be to ensure continuous improvements, to transform the comments and suggestions into development actions, and to continuously improve the effectiveness of organisational processes, therefore, the field of business development is also part of the speak-up development.

There should be information sharing and feedback loops among the three fields, which should be established by a continuous dialogue between the managers and the functional areas.

### III. Introducing a speak-up culture: building blocks of the process

#### 1. Preparation

##### 1.1. Mapping

Before the introduction of the formal system, it is advisable to review the business standards and the efficacy of the reporting and information channels, and to carry out an ethical and business risk analysis concerning the actual situation. It is necessary to have an overview of the current state and conditions of the organisational culture, the quality and direction of the communication between the managers and the employees, and the level of organisational confidence (as an initial state).

##### 1.2. Directives and the commitment of the senior management

The directives in line of which the organisation will operate a culture of speaking up and standing up can be defined on the basis of the results of the analysis and the intentions of the organisation. As a specific recommendation with regard to the above, we provide the two most fundamental directives:

Directive 1: The organisation is committed to fair business practices and lawful operation.

Directive 2: The comments of the employees create an opportunity for the organisation to correct possible errors and prevent greater problems deriving from such errors.

It is clear that **Shell**, similarly to the other companies contacted, makes an effort to create a non-discriminatory and harassment-free environment. An excerpt from the Code of Conduct: “We will not tolerate any action, conduct or behaviour which is humiliating, intimidating or hostile. Treat others with respect”. It is mandatory for all employees to participate in the “Respect at Workplace” training. At Shell, like in many

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other companies, the MeToo movement also gave impetus to this issue, since according to Shell's view, current societal issues have to be responded.

In addition to respecting universal human rights, **Telekom** primarily focuses on proper functioning, freedom of expression, and the implementation of organisational values. "Speak out", "Dare to speak up"—these are values at a strategic level, going beyond formal channels

### 1.3. Defining the objectives and finding a place for the topic within the organisation

Concerning the introduction of a culture of speaking up and standing up, the objective can be defined in line with the directives. The objective determines which organisational function is responsible for the topic according to the following criteria:

- the employees dealing with the topic can carry out their work independently of any external influence of the senior management,
- it shall be ensured that the required specialised knowledge and sufficient resources are available for dealing with the topic,
- an impartial and unbiased investigation shall be ensured for the reporting persons.

At **E.ON** too, it was the parent company which initiated the establishment of a system appropriate for dealing with workplace abuse cases on which a working group worked for two years. After some careful preparatory work, the group proceeded step-by-step so that the system could become part of the corporate culture and a requirement of the E.ON collective. It is important to note that they were not content with merely establishing the system, but they have been monitoring organisational changes so that the attitude can be taken up in the newly-integrated organisational units, and the use of formal channels can become a general practice.

- improving the communication between managers and employees
  - preparing the managers
  - new methods of accessibility, introducing new forums for communication

At **AVIS**, the formal speak-up system is built on the particularly robust informal channels, such as two-way open communication, the "accessibility" of the CEO, and "open hours" ensuring participation for all and giving room to personal initiatives. In the company, they provide many opportunities for dialogue (e.g. Talent Review, Keep Level Meeting, etc.)

- encouraging and giving positive reinforcement for open and honest feedback

At most organisations, the process begins during the onboarding, training and testing (Codes of Ethics, Code of Conduct, Compliance Guidelines) the newly recruited employees, which subsequently, due to the annual (usually online) refresher trainings and tests, helps keep knowledge up to date.



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According to **AVIS**'s practice, this issue is also included in the 1-2 structured day long onboarding (company history, structure, values, levels, platforms, work rhythm). During the onboarding, opportunities and values are outlined in the context of a virtual journey, in the form of a presentation. The new employees also participate in e-learning trainings dealing with data protection, code of conduct, and power of difference.

- strengthening the level of organisational trust through demonstrating the non-retaliation policy (it is safe to form opinions within the organisation), strengthening the setting of well-being

Characteristics of a setting of psychological safety:

- Every employee's opinion counts, the team members focus on their resources and opportunities.
- It is allowed to make mistakes and errors, or to give up something. There are lessons in failures, and it is our mistakes we can learn the most from. They openly take responsibility for their mistakes.
- Honesty is a fundamental norm in the field of co-operation, meaning that the employees can reveal what disturbs them and what they agree with. It can be considerably helpful if feedback culture is part of the organisational culture so team members can confidently give feedback to each other, and they dare to do so.
- It is "allowed" to disagree and represent and communicate a dissenting view; transparent and open communication is a core value for the team.
- The relations at interpersonal level are characterised by acceptance, helpfulness, and mutual respect.

At **Shell**, great emphasis is placed on management development and sensitisation programmes, strengthening feedback culture and supporting and expanding the atmosphere of psychological safety for all employees.

- introducing new communication methods in the communication within the teams
- developing reporting channels, process, regulation, provision of resources

When we talk about the culture of speaking up and standing up, we cannot equate the culture of speaking up and standing up with the handling of employee reporting channels. The culture of speaking up and standing up is important, but only one of its tools is the provision of employee reporting channels and the regulation of the elements related to it.

If the organisation would like to represent the culture of speaking up and standing up more strongly, it is necessary to focus on the following aspects regarding the development of reporting channels:

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- defining the process
  - regulation
  - reporting channels
  - handling reports
  - ensuring transparency
  - monitoring
  - training, feedback, corrective measures
  - communication.

- extensive preliminary communication and trainings

If the conditions for the culture of speaking up and standing up have been created, it is important that all interested parties are aware of its existence. A good first step is the organisation promoting the importance of speaking up and standing up, its ideas and policy in this regard. It is also essential to communicate that the organisation values its employees and considers the freedom of expression important. The essence of communication is to ensure that employees understand the company's policy on the freedom of expression, why it is important and beneficial to employees and the company, as well as to allay the company's concerns about adverse consequences.

This can be carried out, for example, by

- proclaiming zero tolerance on any retaliatory or discriminatory action and foresees consequences;
- proclaiming zero tolerance on discriminatory behaviour among employees;
- assuring the employees of continuous support regarding the freedom of expression and its handling;
- emphasising that anonymity is ensured and
- acting accordingly!

During the introduction, offline communication tools and visual experiences should also play a major role, since this is how the emotional connection (e.g. identification) to the topic can be shaped.

## **2. Regulation**

The company regulators set out how the formulated corporate policy is represented, how speaking up and standing up on a particular issue can be realised. Whatever name is used, it is necessary to clearly regulate the company's values as well as the elements of inappropriate behaviour.

It is an important criterion that the regulation is available and accessible to employees, and that it contains at least the following elements:

- the purpose and scope of the regulation, what it covers and what it does not cover;
- where and how the employee can make a report, to whom he can contact;

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- to whom his case comes, who is involved in the investigation and how it is conducted;
  - what information should and should not be provided;
  - how the company can support anonymity and assist the reporting person until and after the investigation is completed;
  - regulation of independence, confidentiality, data management and data protection issues;
  - protection of reporting persons from adverse consequences concerning them.

All of this requires extensive communication, preparation of educational materials and training, so that the appropriate information reaches all persons concerned. The training materials demonstrate the correct norms of behaviour either by supporting short films, e-learning or gamified animations.

### **3. Development of reporting channels**

At companies with (also) an online reporting channel, the reporting channel is protected and anonymity is ensured. In the case of companies with an international background, it is often an independent representative of the home country that ensures the handling of employee reports.

Tasks related to the development of process elements are the following:

- defining the fields of expertise, actors and roles involved in the topic,
- communication of the company policy of speaking up and standing up,
- operation and handling of reporting channels, the process of investigation and data collection tasks, responsible persons and deadlines,
- after the reporting, continuous monitoring of the interactions between the employee concerned, the team, the management and others affected and of the development of the workplace atmosphere in order to avoid adverse consequences regarding the reporting person.

Other possible reporting channels:

- in writing on paper, suggestion box
- by post
- by email
- via telephone hotline.

Reporting employees should be encouraged to use it for the first time (prepare a separate communication plan and campaign to increase awareness; make it clear that not the environment of whistleblowing was aimed at, but the goal was to ensure that anyone in the company can speak and their opinion matters; provide them with specific, illustrative examples of correct and incorrect speak-up usage and possible topics).

Reporting channels are expected to be accessible to all employees, to ensure the confidentiality of reporting, anonymity, to protect the reporting person, and to prevent unauthorised employees or other persons from accessing the data, documents, or any content of the report. It should be

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separate from the organisation's general communication channels due to confidentiality and handling of confidential information.

## Handling reports

The person reporting will receive a confirmation of the report within a maximum of 5-7 working days—in addition to the automatic system message of receipt. Between the receipt and conclusion of the case, the reporting person should be constantly informed on the development of his case, and know what stage his case is at. No more than 90 days should elapse between the reporting and the conclusion.

During the investigation of the cases, the organisation should ensure that the employees involved in the investigation are independent and irreproachable in terms of conflict of interest (compliance officer, diversity officer, HR BP, financial manager, etc.). Impartial and competent person(s) should be involved in the processing of reports. The person reporting knows who he can turn to and who he can ask for further information regarding the investigation of the case, who will give him feedback.

During the investigation of reports, the employees affected by the report should be ensured of the enforcement of their right to an effective remedy and a fair trial, as well as protection and the presumption of innocence, including the exercise of their right to be heard and their right to inspect documents.

The investigation of the reports should be sufficiently thorough in order to have enough information about the case: who, what, why, when and where; who knew; when was the report made; what was the response to the report; who did not report the case, who knew about it (and why he did not); what conclusions were drawn, etc.

All these factors are worth measuring and investigating in order to know exactly what is happening or not happening in the organisation.

At **SHELL**, employees are encouraged to express their opinions directly or provide feedback. There is an annual employee opinion survey, in which employees can evaluate, among other things, the workplace atmosphere, teamwork or their manager.

The SEED and BIC feedback tools were introduced to the employees so that they could effectively formulate their feedback.

All indications and feedback are taken seriously, regardless of whether they are launched via informal or formal channels (manager, HR, Helpline, Employee Representation). If the case requires an investigation, it is taken into account that the process is objective, that a trained/qualified specialist leads the investigation, that attention is paid to the confidentiality of the case and to data protection.

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## 4. Feedback – transparency

Whether the report was made to investigate a grievance or to implement a corrective action, it is recommended that the lessons learned from the incident are fed back into the organisation as a learning point. Possible forums for this:

- regularly informing managers in a form that is not connected to the particular time or not recognisable,
- sharing best practices,
- informing senior managers,
- in the forum on ethical issues and dilemmas, case studies without names, highlighting lessons learned,
- informing employees through forums and the company intranet or live discussion channel.

•At **AVIS**, employee forums are held regularly in addition to the usual intranet platforms. The communication is two-way: the topics in the annual communication calendar are “given” to managers on a quarterly basis, but they can also suggest topics.

•In the case of **HEINEKEN**, the ethical principles and policies made public on the intranet portal are also displayed on banners in departments where continuous internet access is not feasible or not part of the daily workflow. To keep their knowledge and skills up to date, ethics representatives receive annual training. They deal with priority with certain topics within the framework of campaigns, for example during the so-called “*Week of Integrity*”. In addition to education, the aim is to continuously cultivate and develop a culture of speaking up, and to incorporate the lessons learned into specific processes or into a subsequent training.

•At **Telekom**, the compliance area promotes whistleblowing channels, their operations and processes through training, internal communication actions (e.g. on World Anti-Corruption Day) to raise awareness and involve more colleagues in the process. At the training sessions they explain the investigation process and demonstrate the means to guarantee whistleblower protection.

## 5. Monitoring

Most of the companies surveyed use employee engagement measures to assess the effectiveness of their culture of speaking up and standing up.

The effectiveness of the process can be measured by the number of whistleblower reports, the results of training, the number of substantiated investigations that staff whistleblowing have led to; in the case of measuring awareness of the issue, e.g. how familiar they are with the whistleblowing line, how much they trust the whistleblowing line, etc.

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**At BP**, for example, they use a variety of measurement tools to monitor the corporate atmosphere: an employee engagement survey is conducted once a year with all employees; a simplified version of this, which includes a section on corporate culture, is conducted twice a year with a quarter of employees.

**HEINEKEN** has a very long history of annual employee satisfaction surveys, with several questions on the inclusive corporate environment and the culture of speaking up as a priority category.

As part of the monitoring system, **TELEKOM** also measures awareness, i.e. the extent to which employees are aware of and trust the whistleblowing channels.

## 6. Training

Extensive information, coaching and training is required for all relevant employees of the company, including temporary workers, student workers, subcontracting partners and third parties. Trainings should make clear which issues fall within the scope of the manager-employee relationship, which should be referred to HR(BP) and which experiences raise ethical issues.

### 6.1. Managers

From the point of view of the speak-up culture, the manager is the primary “interface” of the speak-up culture, they are the first to receive comments, and the quality of the cooperation with them must create a medium where employees can feel that they have the courage to speak, are able to speak and represent their point of view and that it makes sense to work on it.

When assessing professional and leadership skills, it is also worth considering the fitting of individual values when selecting a manager.

At **SHELL**, for example, compatibility with the company’s values is already an important criterion in the selection of managers. Leadership competences include the learner’s perspective (linked to psychological safety). Shell has set up a leadership programme to develop a speak-up culture. The lessons learned from the cases investigated on the Helpline are discussed and shared (ensuring anonymity and confidentiality) under the “Ethics & Compliance dilemmas and practices” initiative. Shell’s strategy is to become one of the most diverse and inclusive organisations in the world, where everyone feels valued and respected.

At **TELEKOM**, they believe that managers have a responsibility to set a good example, and there is a strong commitment from senior management to give employees the freedom to express their views.

**BP**’s commitment to universal human rights is reflected in the sign “the inclusive, agile and digital bp workplace” as soon as you enter the building. That this is not just a slogan is demonstrated by the fact that this value is being incorporated into management training, because only then will inclusiveness become part of the corporate culture.

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The training and sensitisation of managers helps to develop a culture of speaking up and standing up: continuous learning, creating and maintaining psychological safety, and competences for managing change can be identified from the practices of large companies. Other elements of leadership development include: improving the effectiveness of leader-employee communication, elements of feedback and supportive leadership communication, the ability to make dialogues, constructive conflict management, confidence building, self-reflection.

## 6.2. Colleagues

Among staff training, the ethics and compliance policies, code of conduct expectations are usually part of the annual training plans in the form of annual refresher training. In addition, education about the culture of speaking up and standing up, the contact details of the whistleblowing platforms, the main steps of the process, the possible outcomes and benefits will help to strengthen the culture of speaking up and standing up. Developing the collaborative competences of staff, fostering a culture of feedback, transparent and inclusive communication and related soft skills training contribute significantly to shaping the culture.

Training should be organised in both online and classroom formats to ensure that cognitive development is complemented by skills development. In the case of online training, gamified e-learning materials should reflect the experience that those who speak up feel good on a personal level, benefit the company and represent a positive future.

**Shell** and **TELEKOM** also believe that psychological safety for all workers is a prerequisite for standing up. This is why it is the key theme for TELEKOM this year. A round table discussion is also held on this, which is available online.

At **AVIS**, for example, the HR organisation holds regular “open hours” where colleagues can join in and discuss or ask questions about any topic that is important to them. In addition to formal channels, the Talent Review and the Keep Level Meeting provide opportunities for dialogue.

**HEINEKEN** educates existing and new employees as well as third party employees with multiple choice Q&A format case studies.

## 6.3. Experts

Training is also provided by the companies surveyed for staff involved in handling the whistleblowing, whether at the communication or investigation stage. In this respect, legal, ethical and investigative training for HRBP staff is a priority, with case studies and supervision support being used as a supporting element.

## 7. Communication

All the communication channels through which the organisation can communicate with its staff can be activated in the topic (newsletters, internal discussion groups, workshops, forums, corporate events, training programmes, senior management letters, field visits, intranet, team events, etc.).