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8 February 2010

Author
KPN Security

Version
3.2

Copyright
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PROTOCOL FOR INTEGRITY INVESTIGATIONS AT KPN



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Registration page

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Owner

Name	L.J. de Vries
Position	Chief Security Officer

Authorized by

Name	A.J. Scheepbouwer
Position	CEO

Managed by

Name	L.J. de Vries
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Reference framework

Policy	Corporate Security Policy
Topic	Integrity investigations
ISO 27001/2	Chapter on Personnel Security

1 The purpose of an integrity investigation

Any breach of regulations, whether internal rules or external legislation, can have a negative impact on the company and/or its staff. Where any such breach takes place, an 'integrity investigation' can be instigated with a view to determining the part played by KPN staff or associated third parties. Where there is no involvement, the investigation will therefore serve to exonerate them.

2 The purpose of this protocol

This protocol sets out the framework within which an investigation into the conduct and actions of staff (the 'integrity investigation') takes place. The underlying principle is that there should always be an equal balance between the interests of KPN (as employer) and the privacy of individual staff members. All KPN reporting entities are required to observe this protocol in full.

3 Internal rules and external legislation

The applicable internal regulations are set out in the Business Control Framework, the Corporate Security Policy, the Collective Labour Agreement(s), individual contracts of employment, and the KPN Corporate Code of Conduct (which comprises several sections).

All regulations can be found using the Agora intranet system.

In the event of a (suspected) breach of external legislation, e.g. in cases of theft, fraud or criminal damage, the standard national and international criminal and civil procedures will apply.

4 Responsibilities of the employer and employee

Management must ensure that all staff have knowledge of current regulations. Nevertheless, each individual member of staff remains personally responsible for apprising himself or herself with those regulations and for ensuring full compliance.

Where there is good reason to suspect that a breach of the regulations has occurred, KPN Security is authorized to initiate an investigation into the conduct and actions of the staff (and/or third parties) concerned. Parties under investigation will be informed accordingly and will maintain the right of rebuttal at all times.

5 Reporting a contravention of the regulations

Every employee is personally and individually responsible for ensuring full compliance with all internal and external regulations. Any employee who has reasonable cause to suspect that a breach of the regulations has occurred must report the matter to KPN Security, either directly to the [KPN Security & Integrity Helpdesk](#), to a manager, or to one of the appointed [confidential advisors](#). A 'whistleblower procedure' is in place to safeguard the interests of the employee making such a report.

Non-employees may also report suspected malfeasance to the helpdesk in situations in which the best interests of KPN are at stake. Similarly, actions on the part of third parties which are likely to affect the best interests of the company and/or any of its staff should be reported to KPN Security.

6 **Confidentiality**

The KPN Helpdesk Security & Integrity Helpdesk deals with all incoming reports, tips and questions in the strictest confidence. The database used to record such information is registered with the Dutch Data Protection Authority (*College Bescherming Persoonsgegevens, CBP*) under number 1035058. Further information (in English) about the CBP can be found on its website at <http://www.dutchdpa.nl>.

7 **Circumstances which will prompt an investigation**

Any incoming report or tip can lead to a formal investigation. However, before taking further action, KPN Security will carefully examine whether the matter falls within its sphere of responsibility and authority, and whether the alleged violation warrants an investigation.

8 **Parties involved in an investigation**

All investigations are conducted with the knowledge of a manager who is at least one hierarchical level senior to the manager who is directly responsible for the staff or department under scrutiny. The findings of the investigation are reported to the CEO and to the director and management team of the reporting entity concerned. Written copies of all statements are issued to the staff concerned. Where the investigation involves any third party, it will be conducted in consultation and cooperation with the person responsible for that party's relationship with KPN.

9 **Procedure**

An investigation into the conduct or actions of KPN employees can only be conducted by duly authorized persons. In the interests of detachment, objectivity, professionalism and due sensitivity, this authorization is confined to the appointed 'Integrity Consultants' within KPN Security. Where KPN Audit has reasonable grounds to believe that internal or external regulations have been breached (e.g. in cases of suspected fraud), it will report the matter to KPN Security. Depending on the exact circumstances (e.g. the nature and extent of the alleged offence) the investigation may then be continued jointly.

10 **Privacy Code for Integrity Consultants**

When conducting any investigation, the Integrity Advisors may apply only the rights and resources which they are entitled to use further to extant legislation. Every [integrity investigation](#) will devote due attention to the balance between the interests of the company and the privacy of individual staff members.

These requirements are formally established by the 'Privacy Code for KPN Security Integrity Advisors' (only available in Dutch). At least once a year, the Chief Security Officer is to inform the Central Works Council of the results of the relevant activities, whereupon the procedures designed to ensure full confidentiality will be subject to review.

11 **Methods and resources**

When conducting an integrity investigation, KPN Security may employ various methods and resources, including:

- gathering information from public sources (e.g. the internet and public registers);
- personal interviews;
- observation and surveillance, which may involve the use of physical devices such as (hidden) cameras;
- consultation of information stored in databases.

When determining the methods and resources to be employed, KPN Security observes the principles of *proportionality* (whereby the resources should be in keeping with the seriousness of the matter under investigation) and *subsidiarity* (moderation in the use of methods and resources).

The investigation methods and resources, together with an account of the framework within which they are to be applied – are described in greater detail in the document [‘Privacy Code for KPN Integrity Consultants’](#).

12 **Sanctions**

Any disciplinary action to be taken further to the results of an investigation will be determined by the relevant (line) manager in consultation with the Human Resources department of the business unit concerned. The imposition of a sanction requires careful consideration and due regard for the relevant article(s) of the Collective Labour Agreement and KPN’s disciplinary policy. KPN reserves the right to hold any employee personally liable for damage or losses incurred further to a blameworthy omission or commission. Where there is reasonable cause to suspect that a criminal offence has been committed, the facts and circumstances will be reported to the police.

13 **Complaints procedure**

Any complaint with regard to the manner in which an investigation has been conducted, the results of that investigation, or any decision made further to those results, must be made in accordance with the KPN Group Complaints Procedure. Full information is available in the HR section of the Agora intranet site.

14 **Validity**

This protocol has been approved by the CEO following consultation with the Central Works Council. It applies to all employees of KPN, employees of the companies in which KPN holds a controlling interest, and employees of the companies for which KPN bears operational responsibility.

15 **Questions**

KPN employees may request a printed copy of this protocol via the KPN Security intranet site or from the [KPN Security & Integrity Helpdesk](#). Questions about the protocol should also be addressed to the helpdesk.