

Escobar Consultancy · Whistleblower Policy

Purpose & Principles ----- This section of the Whistleblower Policy for Escobar Consultancy details our approach in practical, operational terms. It explains why the topic matters, how it integrates with client commitments, and what good looks like. It also provides edge cases, illustrative examples, and escalation paths to reduce ambiguity. All guidance aligns with applicable laws, contractual obligations, and internal standards. Key expectations include clear ownership, documented procedures, maker-checker controls, and data-driven decision-making. Managers must ensure capacity planning, role clarity, and timely approvals. Employees must follow the documented steps, use prescribed systems (HRIS, ITSM, GRC), and maintain evidence for audit. Where judgement is required, apply a risk-based lens: assess impact, likelihood, and regulatory/materiality thresholds, seek guidance early, and record the rationale for transparency. Examples: how to handle overlapping requests, conflicts between client SLAs and internal rules, and scenarios involving vendors, contractors, or cross-border work. For communications, use respectful, inclusive language and keep records in the system of record. KPIs and KRIs should be reviewed at least quarterly with trend analysis and corrective actions. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios.

Scope & Applicability ----- This section of the Whistleblower Policy for Escobar Consultancy details our approach in practical, operational terms. It explains why the topic matters, how it integrates with client commitments, and what good looks like. It also provides edge cases, illustrative examples, and escalation paths to reduce ambiguity. All guidance aligns with applicable laws, contractual obligations, and internal standards. Key expectations include clear ownership, documented procedures, maker-checker controls, and data-driven decision-making. Managers must ensure capacity planning, role clarity, and timely approvals. Employees must follow the documented steps, use prescribed systems (HRIS, ITSM, GRC), and maintain evidence for audit. Where judgement is required, apply a risk-based lens: assess impact, likelihood, and regulatory/materiality thresholds, seek guidance early, and record the rationale for transparency. Examples: how to handle overlapping requests, conflicts between client SLAs and internal rules, and scenarios involving vendors, contractors, or cross-border work. For communications, use respectful, inclusive language and keep records in the system of record. KPIs and KRIs should be reviewed at least quarterly with trend analysis and corrective actions.

Definitions ----- This section of the Whistleblower Policy for Escobar Consultancy details our approach in practical, operational terms. It explains why the topic matters, how it integrates with client commitments, and what good looks like. It also provides edge cases, illustrative examples, and escalation paths to reduce ambiguity. All guidance aligns with applicable laws, contractual obligations, and internal standards. Key expectations include clear ownership, documented procedures, maker-checker controls, and data-driven decision-making. Managers must ensure capacity planning, role clarity, and timely approvals. Employees must follow the documented steps, use prescribed systems (HRIS, ITSM, GRC), and maintain evidence for audit. Where judgement is required, apply a risk-based lens: assess impact, likelihood, and regulatory/materiality thresholds, seek guidance early, and record the rationale for transparency. Examples: how to handle overlapping requests, conflicts between client SLAs and internal rules, and scenarios involving vendors, contractors, or cross-border work. For communications, use respectful, inclusive language and keep records in the system of record. KPIs and KRIs should be reviewed at least quarterly with trend analysis and corrective actions. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios.

Roles & Responsibilities ----- This section of the Whistleblower Policy for Escobar

Consultancy details our approach in practical, operational terms. It explains why the topic matters, how it integrates with client commitments, and what good looks like. It also provides edge cases, illustrative examples, and escalation paths to reduce ambiguity. All guidance aligns with applicable laws, contractual obligations, and internal standards. Key expectations include clear ownership, documented procedures, maker-checker controls, and data-driven decision-making. Managers must ensure capacity planning, role clarity, and timely approvals. Employees must follow the documented steps, use prescribed systems (HRIS, ITSM, GRC), and maintain evidence for audit. Where judgement is required, apply a risk-based lens: assess impact, likelihood, and regulatory/materiality thresholds, seek guidance early, and record the rationale for transparency. Examples: how to handle overlapping requests, conflicts between client SLAs and internal rules, and scenarios involving vendors, contractors, or cross-border work. For communications, use respectful, inclusive language and keep records in the system of record. KPIs and KRIs should be reviewed at least quarterly with trend analysis and corrective actions. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk.

Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios.

Standards & Requirements ----- This section of the Whistleblower Policy for Escobar Consultancy details our approach in practical, operational terms. It explains why the topic matters, how it integrates with client commitments, and what good looks like. It also provides edge cases, illustrative examples, and escalation paths to reduce ambiguity. All guidance aligns with applicable laws, contractual obligations, and internal standards. Key expectations include clear ownership, documented procedures, maker-checker controls, and data-driven decision-making. Managers must ensure capacity planning, role clarity, and timely approvals. Employees must follow the documented steps, use prescribed systems (HRIS, ITSM, GRC), and maintain evidence for audit. Where judgement is required, apply a risk-based lens: assess impact, likelihood, and regulatory/materiality thresholds, seek guidance early, and record the rationale for transparency. Examples: how to handle overlapping requests, conflicts between client SLAs and internal rules, and scenarios involving vendors, contractors, or cross-border work. For communications, use respectful, inclusive language and keep records in the system of record. KPIs and KRIs should be reviewed at least quarterly with trend analysis and corrective actions. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk.

Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and

decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios.

Processes & Workflows ----- This section of the Whistleblower Policy for Escobar Consultancy details our approach in practical, operational terms. It explains why the topic matters, how it integrates with client commitments, and what good looks like. It also provides edge cases, illustrative examples, and escalation paths to reduce ambiguity. All guidance aligns with applicable laws, contractual obligations, and internal standards. Key expectations include clear ownership, documented procedures, maker-checker controls, and data-driven decision-making. Managers must ensure capacity planning, role clarity, and timely approvals. Employees must follow the documented steps, use prescribed systems (HRIS, ITSM, GRC), and maintain evidence for audit. Where judgement is required, apply a risk-based lens: assess impact, likelihood, and regulatory/materiality thresholds, seek guidance early, and record the rationale for transparency. Examples: how to handle overlapping requests, conflicts between client SLAs and internal rules, and scenarios involving vendors, contractors, or cross-border work. For communications, use respectful, inclusive language and keep records in the system of record. KPIs and KRIs should be reviewed at least quarterly with trend analysis and corrective actions. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios.

Controls, Checklists & Templates ----- This section of the Whistleblower Policy for Escobar Consultancy details our approach in practical, operational terms. It explains why the topic matters, how it integrates with client commitments, and what good looks like. It also provides edge cases, illustrative examples, and escalation paths to reduce ambiguity. All guidance aligns with applicable laws, contractual obligations, and internal standards. Key expectations include clear ownership, documented procedures, maker-checker controls, and data-driven decision-making. Managers must ensure capacity planning, role clarity, and timely approvals. Employees must follow the documented steps, use prescribed systems (HRIS, ITSM, GRC), and maintain evidence for audit. Where judgement is required, apply a risk-based lens: assess impact, likelihood, and regulatory/materiality thresholds, seek guidance early, and record the rationale for transparency. Examples: how to handle overlapping requests, conflicts between client SLAs and internal rules, and scenarios involving vendors, contractors, or cross-border work. For communications, use respectful, inclusive language and keep records in the system of record. KPIs and KRIs should be reviewed at least quarterly with trend analysis and corrective actions. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios.

Training, Communication & Awareness ----- This section of the Whistleblower Policy for Escobar Consultancy details our approach in practical, operational terms. It explains why the topic matters, how it integrates with client commitments, and what good looks like. It also provides edge cases, illustrative examples, and escalation paths to reduce ambiguity. All guidance aligns with applicable laws, contractual obligations, and internal standards. Key expectations include clear ownership, documented

procedures, maker-checker controls, and data-driven decision-making. Managers must ensure capacity planning, role clarity, and timely approvals. Employees must follow the documented steps, use prescribed systems (HRIS, ITSM, GRC), and maintain evidence for audit. Where judgement is required, apply a risk-based lens: assess impact, likelihood, and regulatory/materiality thresholds, seek guidance early, and record the rationale for transparency. Examples: how to handle overlapping requests, conflicts between client SLAs and internal rules, and scenarios involving vendors, contractors, or cross-border work. For communications, use respectful, inclusive language and keep records in the system of record. KPIs and KRIs should be reviewed at least quarterly with trend analysis and corrective actions. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios.

Monitoring, Metrics & Audits ----- This section of the Whistleblower Policy for Escobar Consultancy details our approach in practical, operational terms. It explains why the topic matters, how it integrates with client commitments, and what good looks like. It also provides edge cases, illustrative examples, and escalation paths to reduce ambiguity. All guidance aligns with applicable laws, contractual obligations, and internal standards. Key expectations include clear ownership, documented procedures, maker-checker controls, and data-driven decision-making. Managers must ensure capacity planning, role clarity, and timely approvals. Employees must follow the documented steps, use prescribed systems (HRIS, ITSM, GRC), and maintain evidence for audit. Where judgement is required, apply a risk-based lens: assess impact, likelihood, and regulatory/materiality thresholds, seek guidance early, and record the rationale for transparency. Examples: how to handle overlapping requests, conflicts between client SLAs and internal rules, and scenarios involving vendors, contractors, or cross-border work. For communications, use respectful, inclusive language and keep records in the system of record. KPIs and KRIs should be reviewed at least quarterly with trend analysis and corrective actions. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios.

Non-Compliance, Exceptions & Disciplinary Actions ----- This section of the Whistleblower Policy for Escobar Consultancy details our approach in practical, operational terms. It explains why the topic matters, how it integrates with client commitments, and what good looks like. It also provides edge cases, illustrative examples, and escalation paths to reduce ambiguity. All guidance aligns with applicable laws, contractual obligations, and internal standards. Key expectations include clear ownership, documented procedures, maker-checker controls, and data-driven decision-making. Managers must ensure capacity planning, role clarity, and timely approvals. Employees must follow the documented steps, use prescribed systems (HRIS, ITSM, GRC), and maintain evidence for audit. Where judgement is required, apply a risk-based lens: assess impact, likelihood, and regulatory/materiality thresholds, seek guidance early, and record the rationale for transparency. Examples: how to handle overlapping requests, conflicts between client SLAs and internal rules, and scenarios involving vendors, contractors, or cross-border work. For communications, use respectful, inclusive language and keep records in the system of record. KPIs and KRIs should be reviewed at least quarterly with trend analysis and corrective actions. Controls should be preventive where feasible, detective where necessary, and corrective as a backstop. Templates and checklists reduce variance and speed up onboarding of new team members. RACI should be explicit; approvals must be time-bound and tracked. Escalate promptly if timelines, budgets, or risk thresholds are at risk. Document assumptions and decisions to enable continuity during leave or attrition. Run tabletop exercises for rare but high-impact scenarios.

Ownership, Versioning & Review ----- This section of the Whistleblower Policy for Escobar Consultancy details our approach in practical, operational terms. It explains why the topic matters, how it integrates with client commitments, and what good looks like. It also provides edge cases, illustrative

examples, and escalation paths to reduce ambiguity. All guidance aligns with applicable laws, contractual obligations, and internal standards. Key expectations include clear ownership, documented procedures, maker-checker controls, and data-driven decision-making. Managers must ensure capacity planning, role clarity, and timely approvals. Employees must follow the documented steps, use prescribed systems (HRIS, ITSM, GRC), and maintain evidence for audit. Where judgement is required, apply a risk-based lens: assess impact, likelihood, and regulatory/materiality thresholds, seek guidance early, and record the rationale for transparency. Examples: how to handle overlapping requests, conflicts between client SLAs and internal rules, and scenarios involving vendors, contractors, or cross-border work. For communications, use respectful, inclusive language and keep records in the system of record. KPIs and KRs should be reviewed at least quarterly with trend analysis and corrective actions.

Appendix: Intake & triage guide; anonymity & confidentiality note; investigation close-out memo.