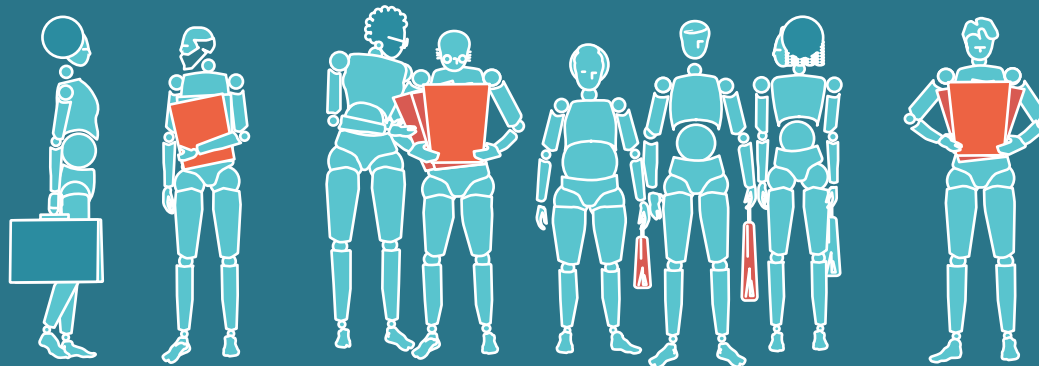


THE GNI INDEPENDENT ASSESSMENT PROCESS *EXPLAINED*

Companies that join the Global Network Initiative commit to a set of principles to protect freedom of expression and privacy - The GNI Principles.

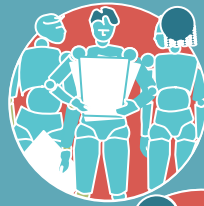
This commitment includes participation in GNI's assessment process. This is an independent assessment of how a company is implementing these principles.

This assessment process is the only one of its kind in the information and communications technology sector.



Assessments are conducted in accordance with the GNI Assessment Guidance and Reporting Framework .

GNI INDEPENDENT ASSESSMENT
STEP-BY-STEP



1. Materials and Case Guidance Preparation



2. Case Selection



3. Assessor Examination of Companies



4. Assessor Reporting



5. GNI Board Review & Determination

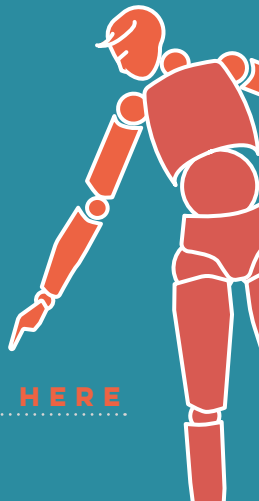


6. Public Reporting on Assessments



7. Company Progress Reporting

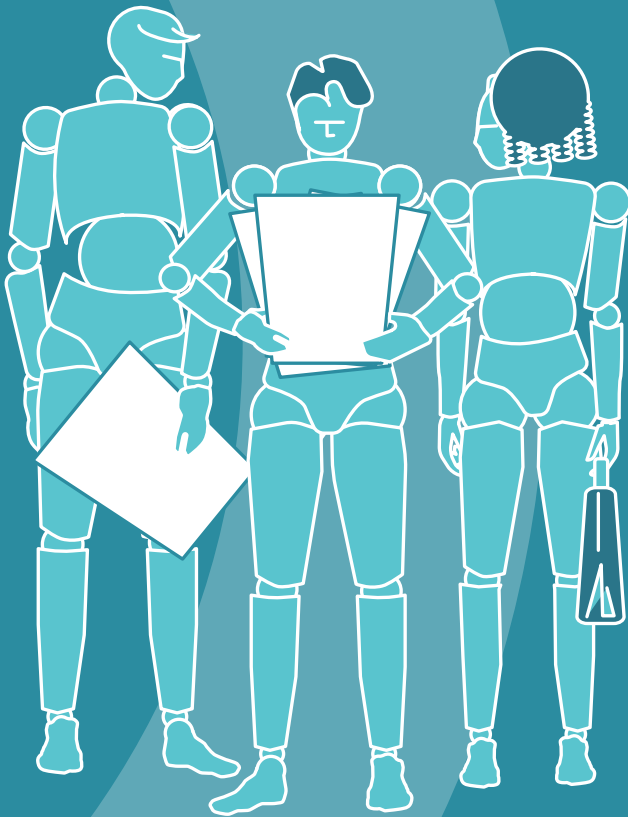
START HERE



PREPARATION OF ASSESSOR MATERIALS & CASE GUIDANCE

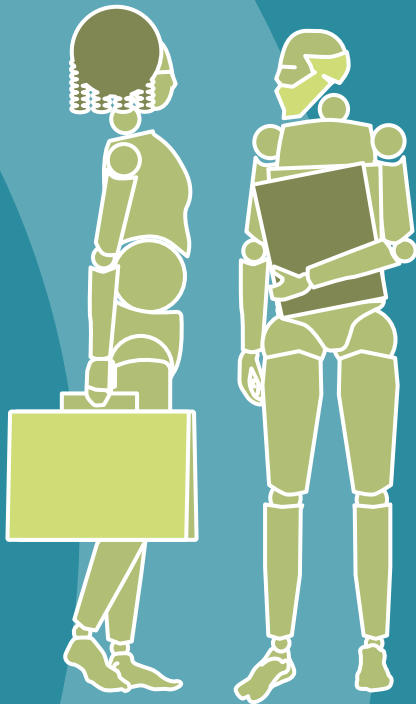
In conducting the independent assessment of a company, the assessors draw input from a number of sources, including:

- A written Case Guidance prepared by the GNI's non-company members specific to each company. The Guidance can include cases that have been reported on publicly, certain types of government requests that may affect free expression or privacy in certain countries or jurisdictional contexts, and particular company policies or processes.
- Input from the GNI Board and GNI companies, and
- The assessors' own independent research.



step 1

1. Materials and Case Guidance Preparation
2. Case Selection
3. Assessor Examination of Companies
4. Assessor Reporting
5. GNI Board Review and Determination
6. Public Reporting on Assessments
7. Company Progress Reporting



CASE SELECTION

Based on the input from different sources and its independent research, the assessor selects the cases to be included in the assessment, and confirms they meet the GNI criteria.

Any individual cases specifically recommended in the case guidance are given particular consideration when deciding which cases to include in the assessment. If such a case is not included, the assessor is required to explain that decision.

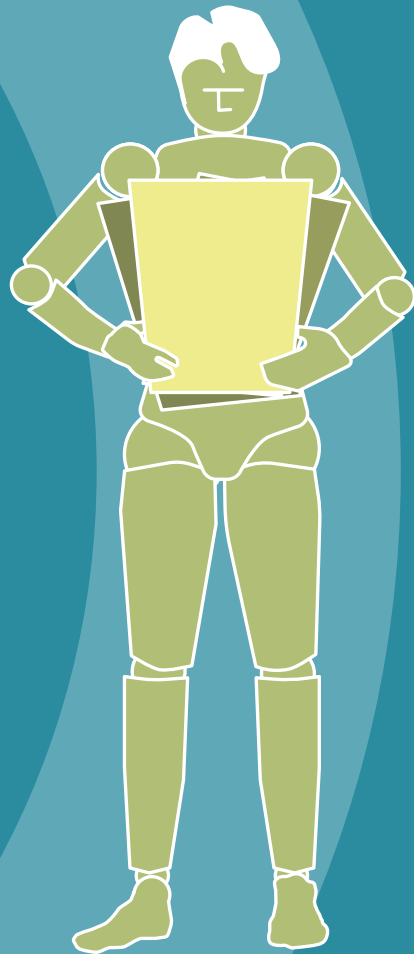
WHO ARE THE INDEPENDENT ASSESSORS?

Accredited assessors must meet the GNI's independence and competency criteria. Each company must choose an assessor from this accredited pool. More information on independent assessors and accreditation is [HERE](#).

step 2

The GNI Independent Assessment Process Explained

1. Materials and Case Guidance Preparation
2. Case Selection
3. Assessor Examination of Companies
4. Assessor Reporting
5. GNI Board Review and Determination
6. Public Reporting on Assessments
7. Company Progress Reporting



ASSESSOR EXAMINATION OF COMPANIES

The assessor reviews relevant aspects of internal company systems, policies and procedures that are in place to implement the GNI Principles, and a number of specific cases or examples.

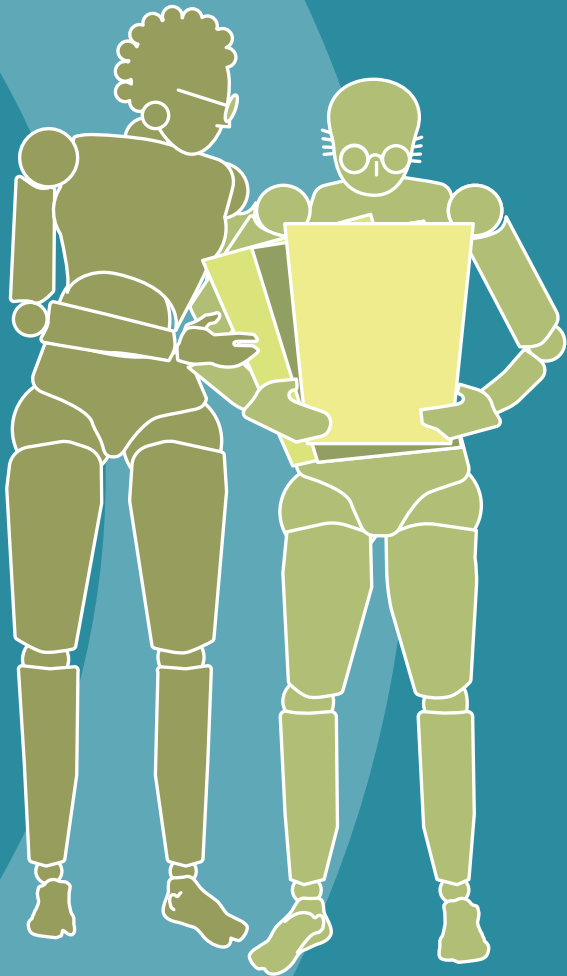
The assessor reviews internal company documents and information, subject to limits on disclosure such as attorney-client privilege, trade secrets, and confidentiality.

The assessor also interviews key employees at various levels who are involved in the company's work to implement the GNI Principles.

step 3

The GNI Independent Assessment Process Explained

1. Materials and Case Guidance Preparation
2. Case Selection
3. Assessor Examination of Companies
4. Assessor Reporting
5. GNI Board Review and Determination
6. Public Reporting on Assessments
7. Company Progress Reporting



ASSESSOR REPORTING

The assessor submits a confidential report to the GNI Board on the assessor's findings. These findings are based on the review of the company's processes and the review of cases. In addition, the assessor provides recommendations for the company's consideration.

The assessors also make recommendations to the GNI as to how the assessment process itself can be improved.

In order to ensure that there have been no violations of anti-trust laws, all the assessor reports are reviewed by GNI's legal counsel.

step 4

The GNI Independent Assessment Process Explained

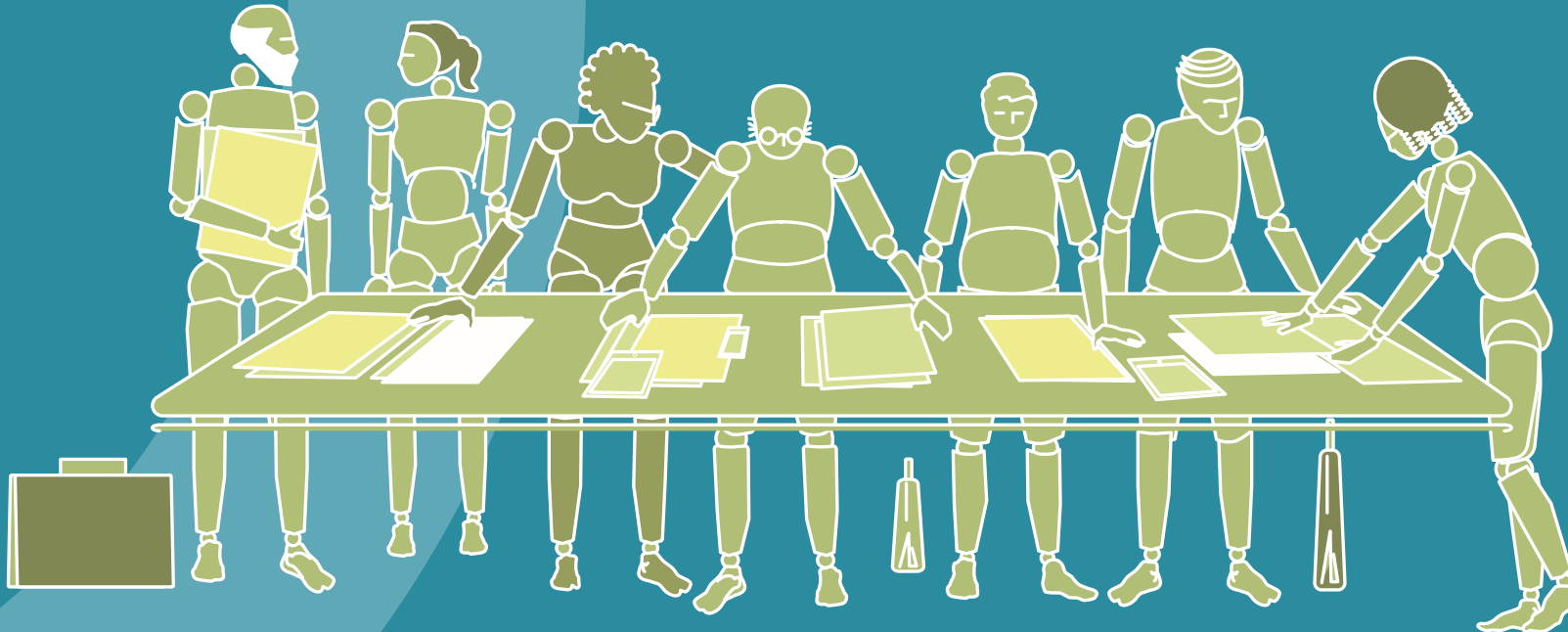
1. Materials and Case Guidance Preparation
2. Case Selection
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7. Company Progress Reporting

BOARD REVIEW & DETERMINATION

It is the role of the GNI Board to determine whether the company is compliant with the GNI Principles, based on a detailed review and consideration of the factual findings and recommendations of the assessors.

A determination of compliance means that the Board believes that the company is making good faith efforts to implement and apply the GNI Principles with improvement over time.

If a particular compliance problem or pattern of problems is identified in an assessor's report, or if a company is not in compliance, the GNI reserves the right to take the steps described in its Accountability, Policy and Learning Framework.



step 5

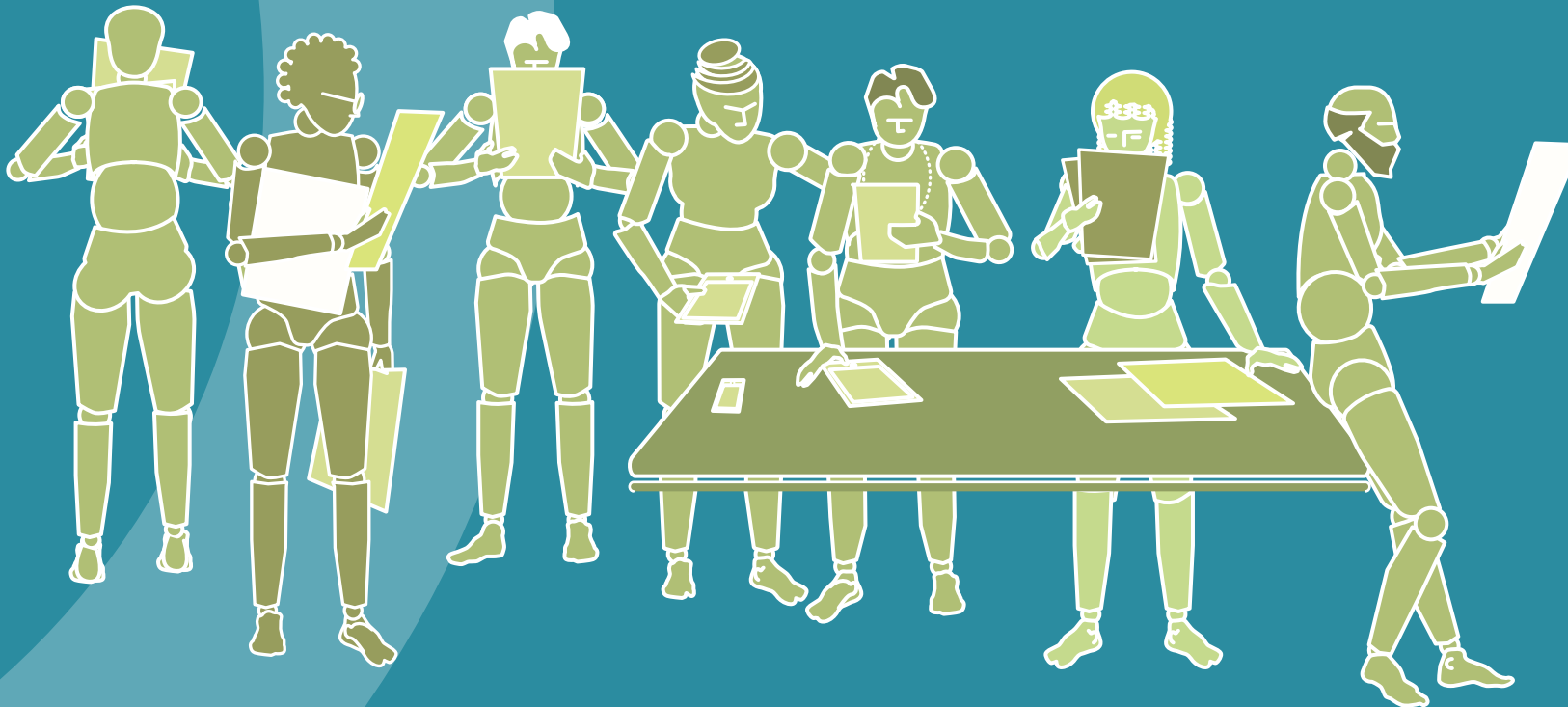
The GNI Independent Assessment Process Explained

1. Materials and Case Guidance Preparation
2. Case Selection
3. Assessor Examination of Companies
4. Assessor Reporting
5. GNI Board Review and Determination
6. Public Reporting on Assessments
7. Company Progress Reporting

PUBLIC REPORTING ON THE ASSESSMENTS

The GNI issues its public report on the independent assessments of the companies after the Board has made its determination. The assessor reports of each company's assessment remain confidential.

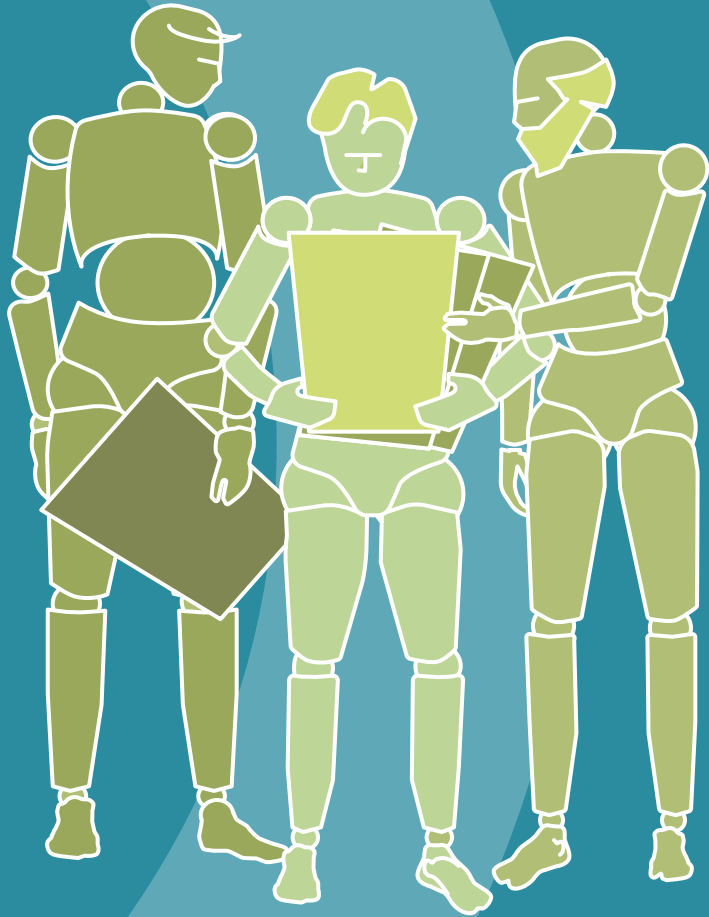
Separately, the companies themselves will issue their own public reports on the outcome of their assessment within six months of the determination by the GNI Board.



step 6

The GNI Independent Assessment Process Explained

1. Materials and Case Guidance Preparation
2. Case Selection
3. Assessor Examination of Companies
4. Assessor Reporting
5. GNI Board Review and Determination
6. Public Reporting on Assessments
7. Company Progress Reporting



PROGRESS REPORTING BY COMPANIES

One year after the Board determination, each assessed company reports back to the GNI Board to follow up on the recommendations received in its assessment report.

step 7

The GNI Independent Assessment
Process Explained

1. Materials and Case
Guidance Preparation
2. Case Selection
3. Assessor Examination
of Companies
4. Assessor Reporting
5. GNI Board Review
and Determination
6. Public Reporting
on Assessments
7. Company Progress
Reporting



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