

PROVISIONS IDENTIFYING EMPLOYEE RESPONSIBILITY

Every employee has a duty to report known or suspected violations of company policy, even when personally involved in the violation.

Employees are expected to cooperate with internal auditors and investigations by providing truthful accounts and relevant documentation in response to questions and information requests.

Employees who fail to cooperate, or otherwise impede an internal audit or investigation, may be subject to disciplinary action in accordance with the company's disciplinary action policy.

PROVISIONS FOR INTAKE

Reports of known or alleged misconduct should be reported to an immediate supervisor or others in Management.

A Helpline exists to provide for and, if requested, anonymous reporting of know or suspected violations of the law or company policy and procedures. (*List Help Line number and Web address of any On-Line reporting tools*)

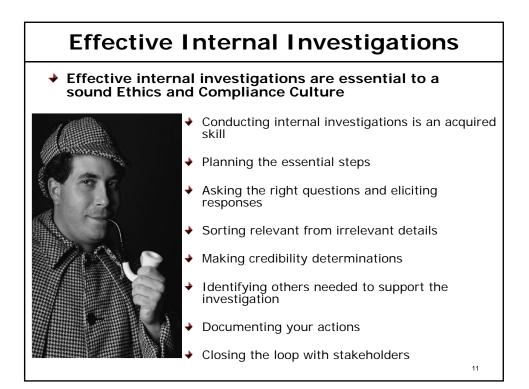
Management personnel are responsible for notifying Ethics & Compliance, Legal, or Human Resources upon receipt of a report of alleged misconduct.

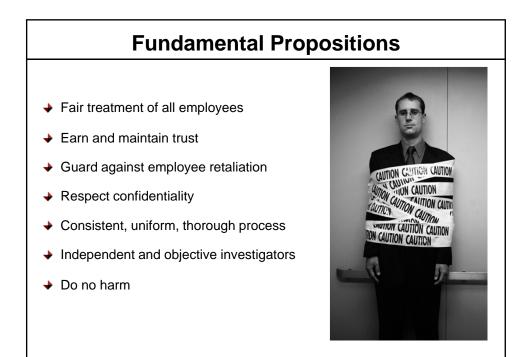
PROVISIONS FOR INTAKE

- There will be no reprisals or retaliation against any employee for reporting, **in good faith**, a suspected or known violation.
- We will strive to maintain the confidentiality of the source. Additionally, reports can be made on an anonymous basis, where local law permits.
- Concerns about accounting, internal accounting controls, auditing matters or other concerns can also be reported by mailing the concern to the Board of Directors or the Audit Committee at the address listed below.

Investigation Scenario #1 – Allegation of Inspection Fraud

An anonymous reporter stated that a coworker, Greg Doe, regularly falsifies inspection reports. The reporter said the employee leaves the work area for long periods of time and can't possibly be meeting the standard of part inspections documented in the department's test and acceptance procedure. The reporter is really concerned because the parts being tested go into highly sensitive medical test equipment. The reporter noted that potentially defective parts incorporated into the medical test equipment could provide a false reading, which could result in costly and unnecessary medical procedures or even worse fail to accurately identify a patient's medical condition.





Investigation Scenario #2 – Allegation of Unfair Treatment

An anonymous reporter stated Jessica Smith, who works in Contracts, is receiving preferential treatment from her supervisor Dan Jones. Mr. Jones allows Ms. Smith to arrive late for work and never disciplines her while others in the department are disciplined for arriving only 2 minutes late. One employee was even written up for arriving late one day after a major traffic accident. Many employees had trouble getting to work that day. "It is unfair and someone needs to look into this and stop it" demanded the reporter. The reporter also stated that Ms. Smith received a merit pay increase that was twice the percentage received by others in the department because Ms. Smith is having an affair with Mr. Jones. Ms. Smith is lazy and does not work at the same level as others in the department. Others feel required to pick up her slack. The reporter is "sick and tired of the way things are being done in this department" and threatened to call the State Department of Employment Discrimination if this unfair treatment is not stopped.

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 Beport Intake – The Five W's*

 Who

 • was involved?

 • was present?

 • may have knowledge?

 • may have had a similar experience?

 • did you talk to about the incident?

 What

 • happened exactly?

 • was said by those involved or witnesses?

 • actions did people take?

 • was the reaction of witnesses?

Report Intake – The Five W's (continued)

What (cont')

- did you do?
- do you want to see happen?
- else should the investigator know?

When

- did the incident occur(day and time)?
- did you talk to others about it?

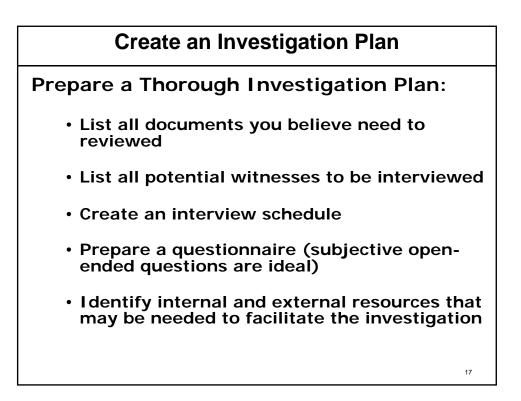
Where

• did the incident occur?

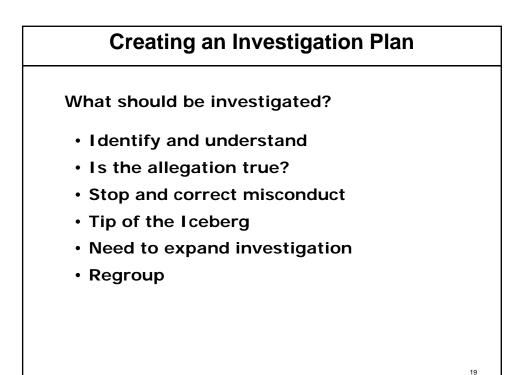
Why

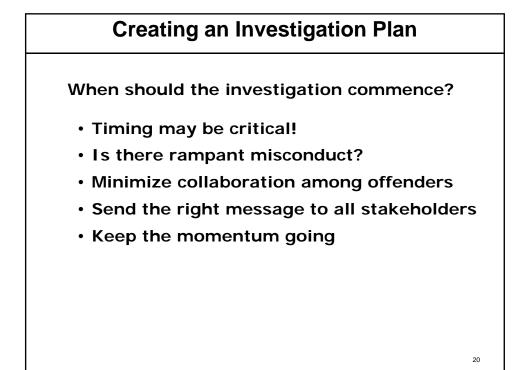
• are you reporting?

Intake Report – Sample Template	
Matter #	Date:
Received by:	Time:
Business Name /Location:	
Reporter's Name (or Nickname):	
	he Allegation or Concern raised by the reporter. (Specifically obtain information as to what occurred, ge of the situation, when did it occur and how often, was the situation or concern reported to anyone
Does the situation reported present any h	ealth or safety risks to persons or risk of damage to property?
What outcome does the reporter expect in	I response to the report made?
Is there a number the reporter can be read	ched at if additional information is required?
(If reporter does not wish to provide a nur	mber, ask the reporter to call back in one week and reference the following Matter #
Matter Assigned to:	
Date Assigned:	
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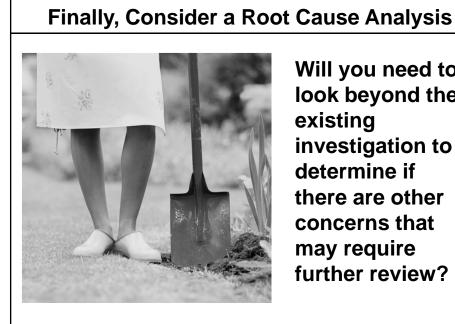




Investigation Scenario #3– Allegation of Supplier Corruption

A reporter who stated she was a purchasing department employee believes that one of the company's suppliers, NeverFail, may be providing kickbacks to her supervisor, Bill Themm. She said her supervisor just returned from a business trip to the supplier's site and shared with her the details of an extravagant dinner meeting that included expensive wine, caviar, lobsters and Kobe beef. "He even took his wife on the business trip and they were treated to a 1st Rate Broadway Show that I can't even get tickets to go see", she stated. She also noted that Mr. Themm has received mail from NeverFail that has "Personal and Confidential" markings on the envelope.

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Will you need to look beyond the existing investigation to determine if there are other concerns that may require further review?