

INTERNAL INVESTIGATIONS POLICY TEMPLATE

It is the policy of (*Organization Name*) to review and, if necessary, investigate all allegations of suspected or known violations of company policy.

Such allegations of misconduct will be reviewed in a timely manner and, if necessary, investigated at the direction of the Chief Ethics & Compliance Officer to determine the relevant facts and circumstances of the alleged violation or misconduct and, if necessary conduct a thorough and timely investigation. Investigation reports will be submitted to appropriate Management personnel, who are responsible for determining the appropriate corrective and disciplinary actions.

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

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

Every reasonable effort will be made to maintain the confidentiality of the source of the report. Additionally, reports can be made on an anonymous basis.

A Helpline exists to provide for anonymous reporting of known or suspected violations of the organization's policy and procedures. (*List Help Line number and Web address of any On-Line reporting tools*)

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

There will be no reprisals or retaliation taken against any employee who reports, **in good faith**, a suspected or known violation. Any employee who engages in retaliatory behavior towards a real or suspected reporter will be subject to disciplinary action up to and including immediate termination.

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

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

Concerns about accounting, internal accounting controls, auditing matters or other concerns can also be reported by mailing the concerns to the Board of Directors or the Audit Committee at the address listed below.

The Chief Ethics and Compliance Officer is responsible for the interpretation and administration of this policy.