

CORPORATE ETHICS AND COMPLIANCE PROGRAM DEVELOPMENT CHECKLIST

- Approval by the Board of Directors to Establish a Code of Conduct, and Appointment of an Officer to Serve as Corporate Compliance Officer
- Appointment of Corporate Compliance and Ethics Manager
- Establishment of Ethics & Compliance Committee Made Up of Select Department Heads.
- Development of Code of Business Conduct and Ethics
- Compliance Guideline Development
- Establish Confidential Ethics Hotline
- Establish Investigative Methods & Procedures for Reported Violations of Ethics and Compliance Program.
- Develop Training Programs – Online and Hardcopy – Covering Minimum Of:
 - Ethics Basics & Values
 - Respect in the Workplace
 - Whistleblower Protections
 - False Claims Act
 - Antitrust
 - Doing Business with the Government
 - Conflicts of Interest
- Develop Awareness Materials
 - Poster
 - Hotline Wallet Cards
 - Ethics Newsletter
 - Ethics Campaign (Respect/Values)
 - Orientation Video
- Establish Audit Function with Reporting Structure to Board of Directors