

APPENDIX III

SAMPLE INVESTIGATION GUIDELINES

The following guidelines apply to our internal investigation of potential violations of law or XYZ Company Compliance policies:

1. When there is a basis to believe that there may have been a violation of law or an XYZ Company Compliance policy, we will exercise due diligence to collect and evaluate relevant facts about the issue and to determine whether or not a violation has occurred.
2. We will conduct investigations in accordance with all applicable laws.
3. We will treat all persons involved in an investigation with respect and fairness.
4. We will determine the extent of an investigation in large part by the seriousness of the issue and the nature and quality of information provided about a potential violation.
5. We will look into issues objectively and impartially and make no presumption at the outset of an investigation whether or not there has been a violation, or whether a person is guilty or innocent of allegations made against him or her. To this end, we will not assign an investigation to persons who have an interest in the outcome of the matter.
6. While investigating a potential compliance violation, we will work to understand all sides of the issue, including, where possible and appropriate, speaking with people whose conduct is at issue. We will consider all relevant facts, whether incriminating or exonerating.
7. We will handle investigations as discretely and confidentially as possible under the circumstances and expect everyone involved in or assisting the investigation to do the same.
8. We will expect full cooperation from our employees and from any others involved, including suppliers, vendors, contractors, and their respective employees. We will not tolerate any attempts to obstruct an investigation.
9. We will strive to complete investigations in a timely, cost-effective manner, while limiting any disruption to on-going business activities.

10. We will not tolerate retaliation against a person who, in good-faith, reports a known or suspected violation of law or XYZ Company policy or who participates in any part of an investigation.
11. Based on all of the collected facts, the appropriate management team will decide what action should result from the investigation. We will treat fact-finding and management decision-making based on the investigation results as distinct parts of the process.
12. We will document the steps taken during the investigation and the results.