

Section Name: CORPORATE POLICIES – LAW
Section No: 7
Policy No: 7.8

Date: 09/07
Supersedes: 10/93 (5.15)

Subject RESPONSE TO GOVERNMENT INVESTIGATIONS

The Company shall cooperate with appropriate authorities in connection with any government investigation. A government investigation is defined as any inquiry by a local, state, federal or law enforcement agency related to activities of the Company or its subsidiaries regarding possible violations of any laws or regulations. This policy does not apply to routine occupational safety and health inspection procedures as outlined in the Environmental, Health and Safety Policy Manual.

Submission of false or misleading information in connection with a government investigation is both a violation of Corporate policy and unlawful. Therefore, review and coordination of any response on behalf of the Company is essential.

PROCEDURE

1. Government investigators may attempt to contact employees directly by phone, at work or at home, or by subpoena. Unit managers shall immediately inform the Law Department in the event any employee is contacted by a government investigator.

In order to ensure coordination, and to furnish accurate and complete information, as well as to safeguard the rights of the Company and its employees, no Company information, whether oral or written, and no records or files, should be furnished except after prior review, advice and approval of the Law Department.

2. However, if a search warrant is issued in connection with a government investigation, the employee should cooperate with the government investigator, promptly notify the Law Department of the investigation and provide a copy or an inventory of any information or documents produced.

Updates:

Law Department

References:

Environmental, Health and Safety Policy Manual

Corporate Policy:

7.7, Subpoenas, Summons and Other Legal Process

7.13, Protection of Confidential and Proprietary Information

Related Topics

Section Name	Policy No	Subject
CORPORATE POLICIES – LAW	7.7	Subpoenas, Summons and Other Legal Process