

PERSONNEL REPORTS OF COMPLIANCE ISSUES

If any independent contractor perceives what he or she believes to be an illegal or unethical act involving another independent contractor or anyone acting on behalf of the organization, the independent contractor should report the activity. The independent contractor may make the report to his or her immediate supervisor; however, if the independent contractor is not comfortable doing so, or if the independent contractor believes that the immediate supervisor's response to the report is unsatisfactory, the independent contractor may report the suspected wrongdoing to a more senior supervisor or to the corporate compliance officer. The organization will make every effort to keep these reports confidential if requested to do so by the independent contractor, although complete confidentiality cannot be guaranteed if the organization deems it necessary to investigate or take other action regarding the report.

No independent contractor will be punished because the independent contractor reported what he or she reasonably believes to be an act of wrongdoing. An independent contractor whose report of misconduct contains an admission of personal wrongdoing, however, cannot be guaranteed protection against disciplinary action. In determining whether, and to what extent, to discipline an independent contractor who reports wrongdoing for which the independent contractor is partly or fully responsible, the organization will consider the fact that the independent contractor volunteered the information as one factor favorable to the independent contractor. An independent contractor may be subject to discipline if the organization determines that the independent contractor knowingly fabricated the report of wrongdoing, in whole or in part.

Signature

Independent Contractor (Printed Name)

Date

REPORT OF SUSPECTED VIOLATION(S)

Name: _____ (unless you wish to remain anonymous)
Home Address: _____
Home Telephone: _____ Work Telephone: _____
Position: _____
Supervisor: _____

1) Description of possible violation: _____

(continue on separate sheet if necessary)

2) When did this occur? _____

3) Person(s) involved: _____

4) How did you come to learn of the incident/practice described above? _____

5) Do you have any evidence to prove the above allegations? If so, please describe: _____

6) Would you be willing to discuss the above allegations with a member of the compliance committee, management or an attorney for the company? _____

7) Have you discussed the above allegations with anyone else? If so, who? _____

8) Do you have any further information to provide or any suggestions for verifying the allegations described above? _____

9) Are you aware of any other individuals who may be able to provide further information regarding the above allegations? _____

NOTE: We will take every measure to ensure the confidentiality of the above information. However, there may be unforeseen circumstances where disclosure to this information may become necessary.