

Corporate Compliance Review Questionnaire

Employee: _____ Dept.: _____

Date of Interview: _____ Interviewer: _____

A. General Compliance Program Awareness

1. How would you describe the XXX compliance program?
2. What are the 5 components of the XXX compliance program?
3. What policies and procedures are there in the program?
4. Where can they be found?

B. Specific Compliance Program Knowledge

1. Who is the XXX compliance officer?
2. What are the general guidelines for accepting or giving gifts?
3. What is the inquiry/reporting process? How many ways can something be reported?
4. Can you report a potential violation without fear of retribution? Is there a fear from retribution policy included in the program?
5. Do you trust the policy? Do you believe that something can be reported truly anonymously? If not, why not?
6. Would you report a potentially unethical or illegal situation, and if so, to whom? If not, why not?
7. Do you feel that the same rules apply to all employees? Why or why not?
8. Have you ever referred to the Code of Business Conduct to answer a question? If not, when would you refer to it?
9. Have you ever reported a violation, and if so, were you satisfied with the action taken? Who did you make the report to? Was the Code of Conduct issue resolved?
10. What is the purpose of the annual Conflict of Interest form?

11. If your personal situation changes from the last Conflict of Interest form that you submitted, what should be done?
12. Government Contracts Compliance (as applicable)
 - a. Do you work with government contracts?
 - b. Are you aware of government purchasing regulations? Do you know what they are?
 - c. Do you know where to find this information? Do you know how you can get additional assistance?
 - d. What training has been provided to help ensure compliance with the government regulations?
13. How is the Code of Business Conduct to be addressed in nongovernment contracts?
14. What responsibilities do all employees have regarding protecting nonpublic information and dealing with publicly traded securities?
15. Are there ethics policies for participating in external professional, service, charitable, or academic organizations?
16. What would an example of a third-party endorsement be? Who can approve someone giving a third-party endorsement?
17. Under what circumstances can you accept an honorarium?
18. Does XXX allow the acceptance of funds from XXX companies?
19. Have you ever had knowledge of an improper activity but chose not to report it? Why didn't you?
20. Have you ever been asked to do anything that you believe violates the Code of Business Conduct or company policies?
21. If someone in your workgroup were suspected of unethical conduct, would you be comfortable assisting in investigating the matter? Why or why not?
22. Do XXX senior management encourage raising ethical concerns? Does your immediate management? If so, how?
23. Do you believe that XXX management respects and follows policies and ethical standards? What about XXX staff personnel? Why or why not?
24. Have you ever seen unethical behavior rewarded? Please describe in general terms.
25. How do you rate XXX's ethical standards compared to other companies?
 - a. Higher than most.

- b. Above average.
- c. Average.
- d. Below Average.
- e. Lower than most.
- f. Don't know.

C. Compliance Program Training and Communication

1. What do you think of the compliance program training program?
2. What was covered in the training program? When did you take it?
3. Do you feel the training was effective and relevant?
4. What do you think of the online annual refresher? What suggestions do you have for topics to be covered? At what intervals should the refresher be given?
5. Do you recall seeing any compliance articles in employee newsletters or in emails? Did you attend any of the Compliance Week events? [**←Author: Is this what the company called it or are you referring the publication?**]
If yes, did you read any or all of them? Were they useful and informative?
6. Has your department done anything to promote compliance awareness?
If so, what have they done? Has anything been particularly helpful?
If not, do you think they should? What kind of activities should be performed?

D. Compliance Program Improvement

1. What is your overall perception of the XXX compliance program?
 - a. Comprehensive and effective.
 - b. Good for reference, but not enough detail.
 - c. Does not seem to address my issues (please explain).
 - d. Good policies, but I have my doubts about enforcement.
 - e. It does not pertain to me.
2. What suggestions do you have to improve the effectiveness of the compliance program?