

**SCHEDULE 4**

EC004397469

## TIPS ON REVIEW/REVISION OF COMPLIANCE PROGRAMS

### *Applicable Laws*

Review the list of laws applicable to your companies.

Is it still accurate?

Have you acquired any new entities that have different businesses or have you engaged in new businesses?

### *Standards*

Do the written standards and procedures distributed by your company adequately cover the laws that are important to your business (see your list)?

Are they distributed to the appropriate personnel?

Do personnel know which standards and procedures apply to them? to the employees they supervise? Do they know the location of the standards and procedures applicable to them?

Are there clear standards of conduct that apply directly to the day-to-day responsibilities of personnel (i.e., are the standards useful)?

Are examples used?

Do personnel know who to call if they have questions concerning the standards?

Are the standards and procedures reviewed on a periodic basis for updating? Are they distributed on a appropriate time schedule? Are reminders given when appropriate?

### *Training*

Does the training that you give your employees adequately address the laws that are important to your business?

Is training given to the appropriate personnel?

Is the training that personnel receive adequate to train them to comply with laws important to your business?

### *Monitoring and Auditing*

Do you have effective monitoring and auditing of compliance with your standards and procedures?

Do you have effective enforcement of compliance with your standards and procedures?

***Reporting Suspected Misconduct***

Do the personnel of your company know that they may report suspected misconduct to their supervisors, a confidential post office box or the Office of the Chairman cc:Mail or PhoneMail Box?

Has there been consistent discipline of persons who violated your standards or procedures?

If management personnel have been found to have violated criminal laws, have they been relieved of their management positions?

***Compliance Committee***

Does your company's compliance committee meet on a regular basis to evaluate the items discussed above? If not, you may wish to consider having a compliance officer instead. Compliance tasks can be delegated, but under the federal sentencing guidelines, a person (or persons) within "high-level personnel" of your company (i.e., a director, an executive officer, or an individual who has substantial control over the organization or who has a substantial role in policy-making) must retain overall responsibility for your company's compliance program.

***Compliance Reports***

In preparing your compliance reports:

Have you looked at the compliance reports for the other groups to see if something is missing from your report?

Have you given detail regarding what seminars are held, who the categories of attendees are and when they are held?

Have you considered having one person keep a calendar/log all year of compliance activities so that next year's report will be easy to prepare?

F:\MB0606\ENR100\COMPLYTIPS.WPD