

Workplace Investigations Appendix O: Business Ethics Bulletin

As part of our commitment to an ethical workplace and to ensure that the company meets its legal obligations, the company requires colleagues and associates to report possible violations of the Code of Business Conduct. The company responds to these reports. From time to time, the lessons learned from an investigation are relevant to the operations of other business groups. We would like to inform you about the results of a recent investigation which may be of interest to you.

Incident

After a routine audit, a client alleged that they were fraudulently overbilled for services. Compliance investigated the matter and determined that the company on-site supervisor (the “Supervisor”) at the client’s location falsified timecards and then kept the over-payment. The Supervisor refused to cooperate with the investigation and was terminated. Law-enforcement managers were also contacted.

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