

The Complete Compliance and Ethics Manual 2024

Appendix 3–Q: Model Internal Investigations Policy

Function	Effective Date	Pages	Revision Date
Global Compliance	[Effective Date]	4	[Revision Date]

Scope

This policy applies to [COMPANY NAME] and its subsidiaries (collectively, “[COMPANY NAME]” or the “Company”) and the directors, officers, and employees of such entities as well as those acting for or on behalf of such entities (collectively, “Covered Persons”).

Purpose

The Company takes all reports of misconduct and potential policy or code of conduct violations seriously and seeks to address them as early as possible so as to prevent damage and mitigate risk.

Policy

The Company has established a compliance helpline for raising potential compliance issues. It is available in multiple languages, 24 hours a day, 7 days a week, and it is hosted and managed by an independent third-party vendor. More information about the helpline can be found in the Company’s Helpline Policy, which can be found here: [INSERT LINK TO HELPLINE POLICY]. The Company does not tolerate retaliation against individuals for raising potential concerns, issues, or policy and/or legal violations in good faith. For more information about protection from retaliation, please see the Company’s Retaliation Prevention Policy, which can be found here: [INSERT LINK TO RETALIATION PREVENTION POLICY].

The Company will promptly investigate all misconduct or wrongdoing brought to its attention through any reporting method or channel using unbiased investigators with appropriate subject matter expertise. The Company will take appropriate steps to address any policy violations. Anyone, regardless of position or title, found to have engaged in conduct that violates the code of conduct or any Company policy may be subject to disciplinary action up to and including termination of employment where merited and permitted by local law. In addition, the Company reserves the right to pursue criminal and/or civil action(s) for wrongdoing where appropriate.

In the event of a potential issue involving the conduct of a member of senior management (director, vice president, or senior vice president), or involving the Human Resources Department, the Legal Department, and/or the Compliance Department, an outside independent third-party investigator will be appointed to investigate to avoid any actual or perceived conflict of interest.

While the Company cannot guarantee confidentiality in every circumstance, it will make every effort to protect

the identity of employees raising a potential issue in good faith. Information will only be shared on a need-to-know basis with individuals responsible for investigating and/or otherwise resolving the potential concern.

If the Company determines there is reasonable basis to believe that a federal, state, or local law or regulation has been violated, it will make a determination as to whether to report or disclose such matter to a government regulator or public authority.

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