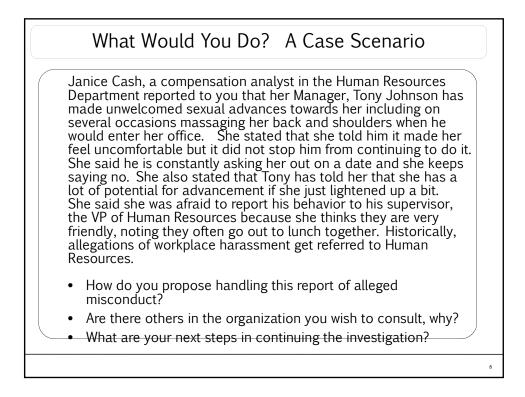




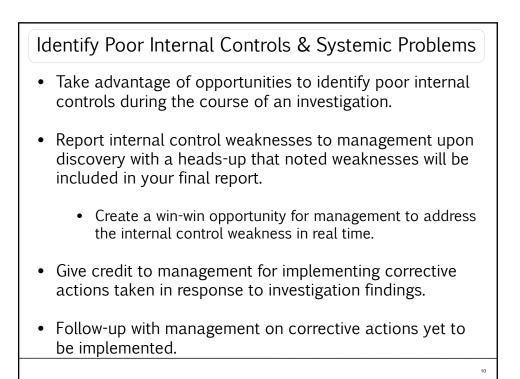
- It's not about placing blame or finger pointing.
- It's about finding the truth and fixing problems to advance the organization's objective to do the right things.
- Partner with all levels of management to prevent further misconduct.
 - Keep management in the loop.

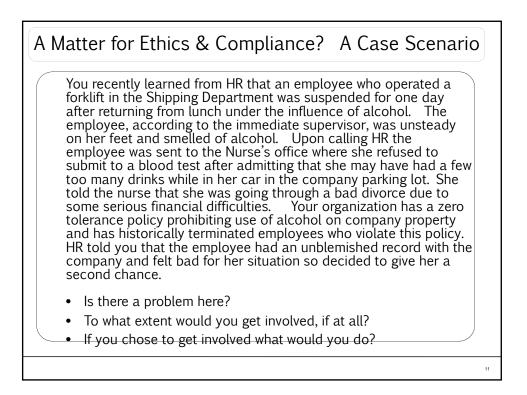


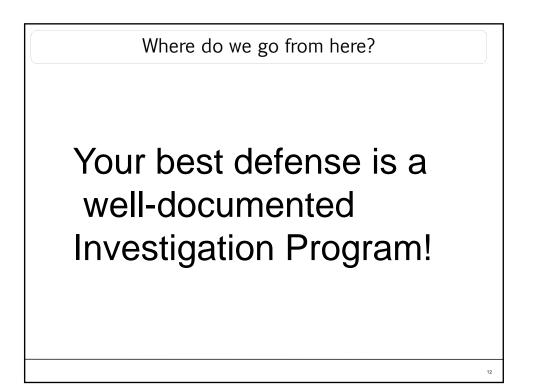


You received a report from a Manager in the Engineering Department stating that he believes several Manufacturing Department operators working on the third shift are failing to properly test and inspect sensitive electronic parts that go into highly sophisticated medical testing equipment. He stated the operators are achieving a 100% success rate on all the tests they perform as compared to an 85% success rate by operators on the first and second shifts. He stated that he addressed his concerns to the General Manager, who responded by stating "what's wrong with the operators on the first second shift who can't get 100%?" The Engineering Manager said he was concerned because potentially defective testing equipment could produce false positive tests that could result in unnecessary medical treatments or worse failure to properly identify a serious medical condition.

- · How would you handle this report of alleged misconduct?
- Are there others in the organization you wish to consult, why?
- What are your next steps in continuing the investigation?

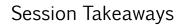






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- Finding, fixing and preventing future misconduct is the key to the success of an Internal Investigations Program.
- Build trust with your Management peers and employees on a continuous basis.
 - Be fair, impartial, and objective in all you do and say.
 - Give others the benefit of doubt.
- Identify opportunities to strengthen internal controls and address legal and compliance risks

