COPY

5>A E82C8<B

*74 +=8E4AB8CH B ?>;82H 5>A 033A4BB8=6 A4?>ACB >5 B4GD0; <8B2>=3D2C >22DAA8=6 >DCB834 C74 B2>?4 >5 *8C;4 !. 8B B4C 5>AC7 8= +% B)4GD0; $8B2>=3D2C '>;82H B44 (4;0C43 !=5>A<0C8>=

*74 +=8E4AB8CH B ?>;82H 5>A 033A4BB8=6 A4?>ACB >5 38B2A8<8=0C8>= 10B43 >= B4G B4GD0; >A84=COC8>= 64=34A 834=C8CH 0=3 ?A46=0=2H ?0A4=C8=6 BCOCDB 8B B4C 5>AC7 8= +% B 8B2A8<8=0C8>= 0=3 0AOBB<4=C '>;82H B44 (4;0C43 !=5>A<0C8>=

SCOPE OF POLIC

*78B ?>;82H 0??;84B C>

- L '4B834=C
- L ,824 '4B834=CB
- L 40=B 8A42C>AB 4?0AC<4=C 403B
- L A40 $0=064AB)D?4AE8B>AB
- L 02D;CH
- L)CO55
- L)CD34=CB
- L &C74AB *78A3 '0AC84B

COPY

CONTACTS

S4"*%#3	C/.3!#3	T%,%0(/.%	O ; #%/D%0!13 - %.3 E- - !), W%" A$$1%22
P/,)#8 C,!1)9#!3)/.	+% *8C;4 !. >>A38=0C>A		+% 4> C8C;48G +% 43D @D0; &??>ACD=8CH *8C;4 !. - 41B8C4
P/,)#8 C,!1)9#!3)/. R%,!3%$ 3/ S34$%.32/ R%0/13).' S34$%.3 C/.#%1.2	+% ><<D=8CH)C0=30A3B 0A4 %4CF>A:		+% 2><<D=8CHBCO=30A3B +% 43D ><<D=8CH)C0=30A3B 0A4 %4CF>A: - 41B8C4
C/.9$%.3)!, A$5)2/1	><<D=8CH ,8>;4=24 !=C4AE4=C8>= 4=C4A ,! ,! 0C +%	$08= &O24 2A8B8B ;8=4 0<?DB 3E8B>A	7CC? 2E82>=;8=4 >A6

COPY

	2>< <D=820C4 0 F8;;8=6=4BB C> ?0AC828?0C4 8= 0 B4GD0; 02C >A 2>=C02C

COPY

A#3)5)38	+=8E4AB8CH >5 %>AC7 0:>C0 4G4A28B4B BD1BC0=C80; 2>=CA>; >E4A 1>C7 C74 A4B?>=34=C 0=3 C74 2>=C4GC 8= F7827 C74 B4GD0; <8B2>=3D2C >22DAB 0=3 0;B> 8=2;D34B 0=H 1D8;38=6 >F=43 >A 2>=CA>;;43 1H 0 BCD34=C >A60=8I0C8>= C70C 8B >O280;;H A42>6=8I43 1H C74 +=8E4AB8CH >5 %>AC7 0:>C0
E - 0,/8%%	=H ?4AB>= 4<?;>H43 5>A F064B >A B0;0AH 1H C74 +=8E4AB8CH 8= 48C74A 5D;; C8<4 >A ?0AC C8<4 20?028CH 8= 0=H ;>20C8>= >A 9>1 G0<?;4B 8=2;D34 >O24AB 502D;CH BCO55 <4382O; A4B834=CB 6A03D0C4 0BB8BC0=CB 0=3 BCD34=C 4<?;>H44B 3D0C4 B>= 4<0 , (qƒ0€

COPY

	L BB>28OC4 BB8BC0=C ,824 'A4B834=CB 0=3 B8<8;0A ;4E4; 03<8=8BCAOC>AB L C7;4C82 8A42C>A L ,824 'A4B834=CB 0=3 B8<8;0A ;4E4; 03<8=8BCAOC>AB L 'A4B834=C
R!0%	*74 ?4=4CAOC8>= => <0CC4A 7>F B;867C >5 C74 E068=0 >A 0=DB F8C7 0=H 1>3H ?0AC >A >1942C >A >A0; ?4=4CAOC8>= 1H 0 B4G >A60= >5 0=>C74A ?4AB>= F8C7>DC C74 2>=B4=C >5 C74 E82C8< *78B 34M=8C8>= 8=2;D34B 0=H 64=34A >5 E82C8< >A ?4A?4CAOC>A
R%20/.$%.3	=8=38E83D0; F7> 70B 144= A4?>AC43 C> 14 C74 ?4A?4CAOC>A >5 2>=3D2C C70C 2>D;3 2>=BC8CDC4 B4GD0; <8B2>=3D2C
!22 - %. ţ CßŷP.Ŕ%3!,)!3)/.	3E4AB4 02C8>= C0:4= 0608=BC 0= 8=38E83D0; 5>A 4=6068=6 8= ?A>C42C43 02C8E8CH %> ?4AB>= <0H 8=C8<830C4 C7A40C4= 2>4A24 >A 38B2A8<8=0C4 0608=BC 0=H 8=38E83D0; 5>A C74 ?DA?>B4 >5 8=C4A54A8=6 F8C7 0=H A867C >A ?A8E8;464 B42DA43 1H *8C;4!. >A +% ?>;82H
S%74!, A22!4,3	*8C;4!. 34M=4B B4GD0; 0BB0D;C 0B A0?4 5>=3;8=6 8=24BC 0=3 BCOCDC>AH A0?4
S%74!, H!1!22 - %.3	B 34M=43 1H *8C;4!. 2>=3D2C >= C74 10B8B >5 B4G C70C B0C8BM4B >=4 >A <>A4 >5 C74 5>;;>F8=6 =4<?;>H44 2>=38C8>=8=6 C74 ?A>E8B8>= >5 0= 083 14=4MC >A B4AE824 >= 0= 8=38E83D0; B ?0AC828?0C8>= 8= D=F4;2><4 B4GD0; 2>=3D2C +=F4;2><4 2>=3D2C 34C4A<8=43 1H 0 A40B>=01;4 ?4AB>= C> 14 B> B4E4A4 ?4AE0B8E4 0=3 >1942C8E4;H >554=B8E4 C70C 8C 45542C8E4;H 34=84B 0 ?4AB>= 4@D0; 0224BB C> C748A 43D20C8>= ?A>6A0< >A 02C8E8CH C78B 8=2;D34B 1DC 8B =>C ;8<8C43 C> D=F4;2><4 2>=3D2C >5 0 B4GD0; =0CDA4 0=3 <0H 2>=B8BC >5 D=F4;2><4 2>=3D2C 10B43 >= B4G >A B4G BC4A4>CH?8=6 >A ũ ţ F8C7 0=ODD 00ţ4 C74 3@

COPY

S3!343/18 R!0%	)4GD0; 8=C4A2>DAB4 F8C7 0 ?4AB>= F7> 8B D=34A C74 BC0CDC>AH 064 >5 2>=B4=C
S34$%.3	;; ?4AB>=B C0:8=6 2>DAB4B 0C 0=3 >A A4248E8=6 8=BCAD2C8>= C7A>D67 C74 +=8E4AB8CH F74C74A 2A438C 7>DAB 0A4 40A=43 5D;; C8<4 >A ?0AC C8<4 ?DABD8=6 D=34A6A03D0C4 6A03D0C4 =>= 346A44 >A ?A>54BB8>=0; BCD384B *74 C4A< BCD34=C 8=2;D34B 0;; ?4AB>=B F7> F8C73A0F 05C4A 0;;4643;H E8>;0C8=6 C74 *Code* F7> 0A4 =>C 4=A>;;43 5>A 0 ?0AC82D;0A C4A< 1DC 70E4 0 2>=C8=D8=6 A4;0C8>=B78? F8C7 C74 +=8E4AB8CH F7> 70E4 144= =>C8M43 >5 C748A 0224?C0=24 5>A 03<8BB8>= >A F7> 0A4 ;8E8=6 8= +=8E4AB8CH A4B834=24 5028;8C84B 34B86=0C43 5>A BCD34=CB A460A3;4BB >5 C748A 2DAA4=C 4=A>;;<4=C BC0CDB *[illegible]BCD34=C 8=2;D34B 1>C7 0 BCD34=C 02C8=6 0B 0= 8=38E83D0; 0=3 C> BCD34=CB 02C8=6 8= 0 6A>D? 0=3 >A 0 BCD34=C >A60=8I0C8>= D=;4BB >C74AF8B4 =>C43
S34$%.3 E - 0,/8%%	BCD34=C F7>B4 4<?;>H<4=C BC0CDB 8B 34?4=34=C D?>= 148=6 0 BCD34=C
S400/13)5 [illegible]	S3!343

COPY

F7> <0H 0BB8BC C74 *8C;4 !. 2>>A38=0C>A 8= C74 38B270A64 >5 C74B4 A4B?>=B818;8C84B *74 *8C;4 !. 2>>A38=0C>A 0=3 34?DCH *8C;4 !. 2>>A38=0C>AB A4248E4 0??A>?A8OC4 CAO8=8=6 C> 38B270A64 C748A A4B?>=B818;8C84B

*74 *8C;4 !. 2>>A38=0C>A <0H 34B86=0C4 0 34?DCH *8C;4 !. 2>>A38=0C>A >A >C74A 0??A>?A8OC4;H CAO8=43 8=38E83D0; C> 20AAH >DC 0=H >5 C74 C0B:B >A 5D=2C8>=B 34B2A8143 8= C78B 3>2D<4=C - 74= C78B ?A>243DA4 A454AB C> *8C;4 !. 2>>A38=0C>A 8C 8B ?A4BD<43 C> <40= *8C;4 !. 2>>A38=0C>A >A 34B86=44

;8BC >5 34?DCH *8C;4 !. 2>>A38=0C>AB 20= 14 5>D=3 >= C74 @D0; &??>ACD=8CH *8C;4 !. F41B8C4 B44 (4;0C43 !=5>A<0C8>=

!=@D8A84B A460A38=6 +% B 4@D0; >??>ACD=8CH 0=3 =>=38B2A8<8=0C8>= ?>;8284B 8=2;D38=6 *8C;4 !. *8C;4 ,! *8C;4 ,!! 0=3)42C8>= >5 C74 (4701 8;8C0C8>= 2C <0H 14 033A4BB43 C>

BB8BC0=C ,824 'A4B834=C @D0; &??>ACD=8CH *8C;4 !.
*8C;4 !. >>A38=0C>A
+=8E4AB8CH >5 %>AC7 0:>C0
*F0<;4H 0;;
4=C4==80; A8E4)C>?
A0=3 >A:B %
'7>=4
<08; +% 4> C8C;48G +% 43D
@D0; &??>ACD=8CH *8C;4 !. - 41B8C4

2><?;08=C >A 2>=24A= A460A38=6 38B2A8<8=0C8>= >A 70A0BB<4=C <0H 0;B> 14 033A4BB43 C>

BB8BC0=C)42A4C0AH 5>A 8E8; (867CB
&O24 5>A 8E8; (867CB
+) 4?0AC<4=C >5 3D20C8>=
$0AH;0=3 E4=D4) -
- 0B78=6C>=
'7>=4
<08; & (43 6>E

!= 022>A30=24 F8C7 *8C;4 !. +% =>C8M4B 0??;820=CB 5>A 03<8BB8>= 0=3 4<?;>H<4=C BCD34=CB 0=3 4<?;>H44B >5 C74 =0<4 >A C8C;4 >O24 033A4BB 4<08; 033A4BB 0=3 C4;4?7>=4 =D<14A >5 C74 *8C;4 !. 2>>A38=0C>A *78B 8=5>A<0C8>= 8B ?A><8=4=C;H 38B?;0H43 >= +% B F41B8C4 0=3 8= 4027 70=31>>: >A 20C0;>6 <034 0E08;01;4 C> C74 5>A46>8=6 8=38E83D0;B

R%20/.$).' 3/ R%0/132 /& T)3,% IX S%74!, M)2#/.$4#3

-74C74A >A =>C 0 5>A<0; 2><?;08=C 8B M;43 +% F8;; A4B?>=3 ?A><?C;H 0=3 F8C7>DC 34;814AOC4 8=3854A4=24 F74= C74 *8C;4 !. 2>>A38=0C>A >A 0 34?DCH *8C;4 !. 2>>A38=0C>A A4248E4B 0 A4?>AC >A >C74AF8B4 70B =>C824 >5 B4GD0; <8B2>=3D2C ?A>7818C43 1H C78B ?>;82H

P1%24 - 03)/. /& N/3 R%20/.2)",%

*74 A4B?>=34=C 8B ?A4BD<43 C> 14 =>C A4B?>=B81;4 5>A C74 0;;4643 2>=3D2C D=C8; 0 34C4A<8=0C8>=

COPY

<43820; 0=3 2;8=82 20A4 <4=C0; 740;C7 ?A>E834AB 2>D=B4;>AB 4<?;>H44B >5 3><4BC82 E8>;4=24 >A B4GD0; 0BB0D;C ?A>6A0<B 0=3 >A308=43 2;4A6H 0;; >5 F7>< <0H 4=6064 8= 2>=M34=C80; 2><<D=820C8>=B D=34A %>AC7 0:>C0 ;0F +% 70B 34B86=0C43 8=38E83D0;B F7> 70E4 ?A8E8;4643 2><<D=820C8>=B 0B 2>=M34=C80; 4<?;>H44B - 74= 8=5>A<0C8>= 8B B70A43 1H 0= 8=38E83D0; F8C7 0 2>=M34=C80; 4<?;>H44 >A 0 2><<D=8CH ?A>54BB8>=0; F8C7 C74 B0<4 ;460; ?A>C42C8>=B C74 2>=M34=C80; 4<?;>H44 0=3 >A 2><<D=8CH ?A>54BB8>=0; 20==>C A4E40; C74 8=5>A<0C8>= C> 0=H C78A3 ?0ACH 4G24?C F74= 0= 0??;8201;4 ;0F ?A>54BB8>=0; BC0=30A3 >A 0 2>DAC >A34A A4@D8A4B >A ?4A<8CB 38B2;>BDA4 >5 BD27 8=5>A<0C8>=

COPY

33C$36€3# Í ..

0=3 4<?;>H44B F7> A4B834 8= >C74A ;>20C8>=B

S400/13)5% M%!241%2

)D??>AC8E4 <40BDA4B <0H 14 >554A43 C> C74 2><?;08=0=C 0=3 C74 A4B?>=34=C A460A3;4BB >5 F74C74A 0 2><?;08=0=C M;4B 0 5>A<0; 2><?;08=C D=34A C78B ?>;82H !5 0 5>A<0; 2><?;08=C 8B M;43 BD??>AC8E4 <40BDA4B F8;; 2>=C8=D4 C> 14 0E08;01;4 C> C74 2><?;08=0=C 0=3 A4B?>=34=C 05C4A C74 2>=2;DB8>= >5 C74 6A84E0=24 ?A>24BB 0B 0??A>?A80C4 F74C74A C74A4 F0B 0 M=38=6 >5 A4B?>=B818;8CH >A =>= A4B?>=B818;8CH *74 *8C;4 !. 2>>A38=0C>A >A 34?DCH *8C;4 !. 2>>A38=0C>A 8B A4B?>=B81;4 5>A 2>>A38=0C8=6 C74 45542C8E4 8<?;4<4=C0C8>= >5 BD??>AC8E4 <40BDA4B

)D??>AC8E4 <40BDA4B <0H 8=2;D34 2>D=B4;8=6 4GC4=B8>=B >5 3403;8=4B >A >C74A 2>DAB4 A4;0C43 039DBC<4=CB <>38M20C8>=B >5 F>A: >A 2;0BB B2743D;4B 20<?DB 4B2>AC B4AE824B <DCD0; A4BCA82C8>=B >= 2>=C02C 14CF44= C74 ?0AC84B 270=64B 8= F>A: >A 7>DB8=6 ;>20C8>=B ;40E4B >5 01B4=24 8=2A40B43 B42DA8CH 0=3 <>=8C>A8=6 >5 24ACO8= 0A40B >5 20<?DB 0=3 >C74A B8<8;0A <40BDA4B)D??>AC8E4 <40BDA4B C> C74 2><?;08=0=C >A A4B?>=34=C F8;; A4<08= 2>=M34=C80; C> C74 4GC4=C C70C <08=C08=8=6 BD27 2>=M34=C8O;8CH F>D;3 =>C 8<?08A C74 0118;8CH >5 C74 +=8E4AB8CH C> ?A>E834 BD??>AC8E4 <40BDA4B)D??>AC8E4 <40BDA4B <0H =>C A4BCA82C 0=H ?0ACH B A867CB D=34A C74 +=8C43)C0C4B >=BC8CDC8>= *74 +=8E4AB8CH F8;; =>C ?A>E834 BD??>AC8E4 <40BDA4B C70C 0A4 2;40A;H D=A40B>=01;4 8= ;867C >5 C74 :=>F= 28A2D<BC0=24B

!=38E83D0;B 0A4 4=2>DA0643 C> A4?>AC C> C74 *8C;4 !. 2>>A38=0C>A 0=H 2>=24A=B 01>DC C74 5O8;DA4 >5 0=>C74A C> 0183 4 1H 0=H A4BCA82C8>=B 8<?>B43 C7A>D67 BD??>AC8E4 <40BDA4 B BD27 0B <DCD0; => 2>=C02C >A34AB != C74 4E4=C >5 0= 8<<4380C4 740;C7 >A B054CH 2>=24A= 8=38E83D0;B B7>D;3 2>=C02C 8<<4380C4;H 8B28?;8=0AH 02C8>= <0H 14 C0:4= 5>A 5O8;8=6 C> 0183 4 1H 24ACO8= BD??>AC8E4 <40BDA4 B

A - .%238

!= >A34A C> 4=2>DA064 2><?;08=0=CB 0=3 F8C=4BB4B C> <0:4 A4?>ACB >5 ?A>7818C43 2>=3D2C 0=3 5>A 0;; ?0AC84B 0=3 F8C=4BB4B C> 5D;;H ?0AC828?0C4 8= C74 8=E4BC860C8>= C74 +=8E4AB8CH F8;; =>C ?DABD4 38B28?;8=0AH 02C8>= 0608=BC BCD34=CB >A 4<?;>H44B 5>A 38B2;>BDA4 >5 ?4AB>=0; 2>=BD<?C8>= >5 0;2>7>; >A >C74A 3AD6B D=34A064 >A 8;;460; >A >C74A <8=>A >554=B4B F74A4 C74 38B2;>BDA4 8B <034 8= 2>==42C8>= F8C7 0 6>>3 5O8C7 A4?>AC >A 8=E4BC860C8>= >5 ?A>7818C43 2>=3D2C 0=3 C74 ?4AB>=0; 2>=BD<?C8>= 383 =>C ?;024 C74 740;C7 >A B054CH >5 0=H >C74A ?4AB>= 0C A8B: *74 +=8E4AB8CH <0H 8=8C80C4 0= 0BB4BB<4=C >A 43D20C8>=0; 38B2DBB8>= >A ?DABD4 >C74A =>= 38B28?;8=0AH >?C8>=B A460A38=6 0;2>7>; >A >C74A 3AD6 DB4

E - 0,/8%% R%O/13).' O",)' !3)/.2

)?428M2 4<?;>H44 A4?>AC8=6 >1;860C8>=B 0A4 ;8BC43 14;>F)70A8=6 38B2;>BDA4B A4?>ACB >A >C74A :=>F= 8=5>A<0C8>= 01>DC 0;;4643 B4GD0; <8B2>=3D2C F8C7 C74 *8C;4 !. 2>>A38=0C>A 0;;>FB C74 +=8E4AB8CH C> <44C 8CB BCOC4 0=3 5434A0; >1;860C8>=B 0=3 C> 0??A>?A80C4;H 033A4BB 0=H B4GD0; <8B2>=3D2C)70A8=6 BD27 8=5>A<0C8>= F8C7 C74 *8C;4 !. 2>>A38=0C>A 0;B> ?A>E834B C74 +=8E4AB8CH F8C7 C74 14BC >??>ACD=8CH C> >554A 0??A>?A80C4 BD??>AC8E4 <40BDA4B C> 0BB8BC 0 2><?;08=0=C 0BB4BB 0=H 740;C7 >A B054CH A8B4??>AB43 B@Ó @4=C >5 0>1;86

COPY

A40B>=01;H :=>F= C70C C74 8=38E83D0; <0H 38B2;>B4 8=5>A<0C8>= 01>DC B4GD0; <8B2>=3D2C

<?;>H44B 0A4 =>C A4@D8A43 C

COPY

- L =H C427=>;>6H C> 14 DB43 0C 0 740A8=6
- L !BBD4B >5 A4;4E0=24 5>A @D4BC8>=B 0=3 4E834=24 8=2;D38=6 F74= @D4BC8>=B 01>DC C74 2>< ?;O8=0=C B B4GD0; ?A438B?>B8C8>= >A ?A8>A B4GD0; 1470E8>A 0A4 =>C A4;4E0=C

!=E4BC860C>AB <DBC 0;B> 14 CAO8=43 >= 8BBD4B >5 A4;4E0=24 C> 2A40C4 0= 8=E4BC860C8E4 A4?>AC C70C 508A;H BD< <0A8I4B A4;4E0=C 4E834=24

3E8B>AB 0BB86=43 1H C74 +=8E4AB8CH F8;; A4248E4 CAO8=8=6 A460A38=6 C748A A>;4 8= C74 ?A>24BB 3E8B>AB 0A4 =>C 4G?42C43 >A A4@D8A43 C> 70E4 0=H B?428M2 ;4E4; >5 CAO8=8=6 >A 4G?4A84=24

;; CAO8=8=6 <0C4A80;B DB43 C> CAO8= C74 5>A46>8=6 8=38E83D0;B F8;; 14 <034 0E08;01;4 C> C74 ?D1;82 1H ?>BC8=6 >= C74 @D0; &??>ACD=8CH *8C;4 !. F41B8C4

!=38E83D0;B F7> 70E4 =>C 2><?;4C43 CAO8=8=6 0B A4@D8A43 1H C78B ?>;82H B70;; =>C 8=E4BC860C4 039D3820C4 >A >C74AF8B4 14 8=E>;E43 8= C74 6A84E0=24 ?A>243DA4B 0BB>280C43 F8C7 C78B ?>;82H

N/.-R%3!,)!3)/. &/1 F),).' /1 P!13)#)0!3).').! S%74!, M)2#/.$4#3 C/ - 0,!).3

%48C74A C74 +=8E4AB8CH =>A 0=H 4<?;>H44 BCD34=C >A 0O;80C4 <0H 8=C8<830C4 C7A40C4= 2>4A24 >A 38B2A8<8=0C4 0608=BC 0=H 8=38E83D0; 5>A C74 ?DA?>B4 >5 8=C4A54A8=6 F8C7 0=H A867C >A ?A8E8;464 B42DA43 1H *8C;4 !. >A 1420DB4 C74 8=38E83D0; 70B <034 0 A4?>AC >A 2><?;08=C C4BC8M43 0BB8BC43 >A ?0AC828?0C43 >A A45DB43 C> ?0AC828?0C4 8= 0=H <0==4A 8= 0= 8=E4BC860C8>= ?A>24438=6 >A 740A8=6 D=34A C74 *8C;4 !.)4GD0; $8B2>=3D2C '>;82H !=C8<830C8>= C7A40CB 2>4A28>= >A 38B2A8<8=0C8>= 8=2;D38=6 270A64B 0608=BC 0= 8=38E83D0; 5>A 2>34 >5 2>=3D2C E8>;0C8>=B C70C 3> =>C 8=E>;E4 B4G <8B2>=3D2C 1DC 0A8B4 >DC >5 C74 B0<4 502CB >A 28A2D<BC0=24B 0B 0 A4?>AC >A 2><?;08=C >5 B4GD0; <8B2>=3D2C >A 0 A4?>AC >A 5>A<0; 2><?;08=C >5 B4GD0; <8B2>=3D2C 5>A C74 ?DA?>B4 >5 8=C4A54A8=6 F8C7 0=H A867C >A ?A8E8;464 B42DA43 1H C74 *8C;4 !.)4GD0; $8B2>=3D2C '>;82H 2>=BC8CDC4B A4C0;80C8>=

=H 2><?;08=C >5 A4C0;80C8>= B70;; 14 8=E4BC860C43 0B ?A>E8343 8= C74 'A>243DA4B 5>A *8C;4 !.)4GD0; $8B2>=3D2C (4B?>=B4 B44 (4;0C43 !=5>A<0C8>=

*74 4G4A28B4 >5 A867CB ?A>C42C43 D=34A C74 8ABC <4=3<4=C 3>4B =>C 2>=BC8CDC4 A4C0;80C8>= ?A>7818C43 D=34A C78B '>;82H 70A68=6 0= 8=38E83D0; F8C7 0 ?>;82H E8>;0C8>= 5>A <0:8=6 0 <0C4A80;;H 50;B4 BC0C4<4=C 8= 103 508C7 8= C74 2>DAB4 >5 0 6A84E0=24 ?A>24438=6 D=34A C78B '>;82H 3>4B =>C 2>=BC8CDC4 A4C0;80C8>= ?A>7818C43 1H C78B '>;82H >F4E4A 0 34C4A<8=0C8>= A460A38=6 A4B?>=B818;8CH 0;>=4 8B =>C BDO284=C C> 2>=2;D34 C70C 0=H ?0ACH <034 0 <0C4A80;;H 50;B4 BC0C4<4=C 8= 103 508C7

P1/ ()")3)/. ! ' !).23 F!,2% S3!3% - %.32

+% ?A>7818CB :=>F8=6;H <0:8=6 50;B4 BC0C4<4=CB >A :=>F8=6;H BD1<8CC8=6 50;B4 8=5>A<0C8>= 3DA8=6 C74 *8C;4 !.)4GD0; $8B2>=3D2C 6A84E0=24 ?A>24BB >8=6 B> F8;; BD1942C C74 ?0ACH <0:8=6 C74 :=>F8=6;H 50;B4 BC0C4<4=C C> 38B28?;8=0AH 02C8>=

R%#/1$ K%%0).'

*74 +=8E4AB8CH B70;; A4C08= 5>A 0 ?4A8>3 >5 B4E4= H40AB A42>A3B >5

&55 20<?DB 20B4B 0A4 DBD0;;H 8=E4BC860C43 1H C74 A0=3 >A:B '>;824 >A >C74A ;0F 4=5>A24<4=C 064=2H - 74= 0= 8=E4BC860C8>= >A ;460; ?A>24438=6 >22DAB >55 20<?DB B4AE824B 0A4 BC8;; 0EO8;01;4 C7A>D67 C74 +=8E4AB8CH

2><?;O8=0=C <0H 27>>B4 C> M;4 0 ?>;824 A4?>AC 8<<4380C4;H >A 0C 0 ;0C4A 30C4 *74A4 <0H 14 2>=B4@D4=24B C> F08C8=6 C> M;4 0 ?>;824 A4?>AC 0A;H A4?>ACB <0H 8<?A>E4 C74 ?A4?0AOC8>= >5 0 E801;4 ?A>B42DC8>= 8;8=6 0 ?>;824 A4?>AC 8<<4380C4;H 5>;;>F8=6 C74 8=2834=C 3>4B =>C 5>A24 C74 2><?;O8=0=C C> M;4 270A64B 0=3 ?A>B42DC4 C74 A4B?>=34=C >F4E4A 8C 3>4B 083 8= C74 ?A4B4AEOC8>= >5 E0;D01;4 4E834=24 85 C74 2><?;O8=0=C 342834B C> ?DABD4 270A64B 0C 0 ;0C4A 30C4

*74)COC4 B CC>A=4H <0:4B 0;; 3428B8>=B A460A38=6 C74 ?A>B42DC8>= >5 0;;4643 2A8<4B A4?>AC43 C> ;0F 4=5>A24<4=C

F),).' ! F/1 - !, C/ - 0,!).3

*> A4@D4BC C70C +% 8=E4BC860C4 0 A4?>AC >5 B4GD0; <8B2>=3D2C >A C> 4=6064 8= 8=5>A<0; A4B>;DC8>= ?A>24BB4B C74 2><?;O8=0=C <DBC M;4 0 5>A<0; 2><?;O8=C F8C7 C74 *8C;4!. 2>>A38=0C>A >A 0 34?DCH *8C;4!. 2>>A38=0C>A *74 5>A<0; 2><?;O8=C <DBC 14 0 FA8CC4= >A 3868C0; 3>2D<4=C C70C 834=C8M4B C74 2><?;O8=0=C 0=3 A4B?>=34=C ?A>E834B 0 <4C7>3 C> 2>=C02C C74 2><?;O8=0=C 0=3 2>=C08=B C74 2><?;O8=0=C B ?7HB820; >A 3868C0; B86=0CDA4 >A >C74AF8B4 8=3820C4B C70C C74 2><?;O8=0=C 8B C74 ?4AB>= M;8=6 C74 2><?;O8=C *78B 2><?;O8=C <0H 14 M;43 F8C7 C74 *8C;4!. 2>>A38=0C>A 8= ?4AB>= 1H <08; >A 1H 4;42CA>=82 <40=B DB8=6 0=H >5 C74 2>=C02C 8=5>A<0C8>= 14;>F

L != ?4AB>= @D0; &??>ACD=8CH *8C;4!. &O24 *F0<;4H 0;; A0=3 >A:B %

L H <08; 4=C4==80; A8E4)C>? A0=3 >A:B %

L H 4<08; +% & *8C;4!. +% 43D

L &= ;8=4 1H BD1<8CC8=6 C74 3868C0; 5>A<0; 2><?;O8=C 5>A< BD??;843 1H C74 *8C;4!. 2>>A38=0C>A

C C74 C8<4 >5 M;8=6 0 5>A<0; 2><?;O8=C 0 2><?;O8=0=C <DBC 14 ?0AC828?0C8=6 8= >A 0CC4<?C8=6 C> ?0AC828?0C4 8= C74 43D20C8>= ?A>6A0< >A 02C8E8CH >5 +%

*74 *8C;4!. 2>>A38=0C>A 70B 38B2A4C8>= C> B86= 0 5>A<0; 2><?;O8=C F74= C74 2><?;O8=0=C 3>4B =>C 3> B> *74 *8C;4!. 2>>A38=0C>A <0H C0:4 28A2D<BC0=24B 8=C> 022>D=C BD27 0B F74C74A C74A4 0A4 0;;460C8>=B >5 0 ?0CC4A= >5 <8B2>=3D2C C7A40CB E8>;4=24 DB4 >5 F40?>=B >A B8<8;0A 502C>AB - 74= C74 *8C;4!. 2>>A38=0C>A B86=B C74 5>A<0; 2><?;O8=C C74 *8C;4!. 2>>A38=0C>A 8B =>C 0 2><?;O8=0=C >A >C74AF8B4 0 ?0ACH C> C74 2><?;O8=C

I& C/ - 0,!).!.3 D%#,).%2 3/ F),% F/1 - !, C/ - 0,!).3

- 74= C74 2><?;O8=0=C 342;8=4B C> M;4 0 5>A<0; 2><?;O8=C +% F8;; B44: C> 7>=>A C74 ?A454A4=24B >5 C74 2><?;O8=0=C F74=4E4A ?>BB81;4 >F4E4A C74 *8C;4!. 2>>A38=0C>A <0H 34C4A<8=4 C70C C74 C>CO;8CH >5 C74 :=>F= 28A2D<BC0=24B 8=3820C4 C74A4 8B 0 A8B: C> C74 B054CH >5 C74 20<?DB 2><<D=8CH 85 0 6A84E0=24 ?A>24BB 8B =>C 8=8C80C43 != C70C 20B4 C74 *8C;4!. 2>>A38=0C>A <0H B86= 0 5>A<0; 2><?;O8=C != BD27 28A2D<BC0=24B C74 *8C;4!. 2>>A38=0C>A 8B =>C C74 2><?;O8=0=C

!= BD27 20B4B C74 *8C;4!. 2>>A38=0C>A F8;; 03E8B4 C74 2><?;O8=0=C C70C +% 8=C4=3B C> ?A>2443 F8C7 0

COPY

6A84E0=24 ?A>24BB 1DC C70C C74 2>< ?;08=0=C 8B =>C A4@D8A43 C> ?0AC828?0C4 8= C74 6A84E0=24 ?A>24BB >A 8= 0=H >C74A 02C8>=B D=34AC0 : 4= 1H +% !5 C74 2>< ?;08=0=C 342;8=4B C> ?0AC828?0C4 8= C74 6A84E0=24 ?A>24BB C74 +=8E4AB8CH B 0188;8CH C> < 40=8=65D;;H 8=E4BC860C4 0=3 A4B?>=3 < 0H 14 ;8 < 8C43 *74 *8C;4 ! . 2>>A38=0C>A F8;; < 0 : 4 A40B>=01;4 455>ACB C> ?A>C42C C74 ?A8E02H >5 C74 2>< ?;08=0=C >F4E4A 02C8>=B C70C < 0H 14 A4@D8A43 0B ?0AC >5 C74 6A84E0=24 ?A>24BB F8;; 8=E>;E4 B?40 : 8=6 F8C7 C74 A4B?>=34=C 0=3 >C74AB F7> < 0H 70E4 A4;4E0=C 8=5>A < 0C8>= 8= F7827 20B4 C74 2>< ?;08=0=C B 834=C8CH < 0H 14 38B2;>B43

R%20/ . $) . ' 3/ R%0/132 ! . $ F/1 - !, C/ - 0,!) . 32

*74 B?428M2 ?A>243DA4B 5>A A4B?>=38=6 C> A4?>ACB 0=3 5>A < 0; 2>< ?;08=CB >5 *8C;4 ! . B4GD0; < 8B2>=3D2C 0A4 2>=C08=43 8= C74 ' A>243DA4B 5>A *8C;4 ! .) 4GD0; $ 8B2>=3D2C (4B?>=B4

) D??>AC8E4 < 40BDA4B F8;; 14 >554A43 C> C74 2>< ?;08=0=C 0=3 A4B?>=34=C 145>A4 >A 05C4A C74 M;8=6 >5 0 5>A < 0; 2>< ?;08=C >A F74A4 => 5>A < 0; 2>< ?;08=C 70B 144= M;43 85 C74 ?0AC84B 834=C8C84B 0A4 : =>F= C> C74 +=8E4AB8CH

DA8=6 C74 6A84E0=24 ?A>24BB C74 +=8E4AB8CH F8;; CA40C C74 2>< ?;08=0=C 0=3 A4B?>=34=C 4@D8C01;H *74 +=8E4AB8CH F8;; ?A4BD < 4 C70C C74 A4B?>=34=C 8B =>C A4B?>=B81;4 5>A C74 0;;4643 2>=3D2C D=C8; 0 34C4A < 8=0C8>= A460A38=6 A4B?>=B818;8CH 8B < 034 0C C74 4=3 >5 C74 6A84E0=24 ?A>24BB

*74 +=8E4AB8CH F8;; >1942C8E4;H 4E0;D0C4 0;; A4;4E0=C 4E834=24 8=2;D38=6 1>C7 4G2D;?0C>AH 0=3 8=2D;?0C>AH 4E834=24 0=3 4=BDA4 C70C 2A4381 8;8CH 34C4A < 8=0C8>=B F8;; =>C 14 10B43 >= 0 ?4AB>=B BC0CDB 0B 0 2>< ?;08=0=C A4B?>=34=C >A F8C=4BB

*74 ?0AC84B 70E4 4@D8C01;4 >??>ACD=8C84B C> 0??40; C74 34C4A < 8=0C8>= A460A38=6 A4B?>=B818;8CH 05C4A 0 740A8=6 >A 0=H < 0=30C>AH >A ?4A < 8BB8E4 38B < 8BB0; >5 0 5>A < 0; 2>< ?;08=C

S3 ! . $! 1$ /& E5)$% . #% 3/ D%3%1 -) . % R%20/ . 2) "),)38

*74 +=8E4AB8CH 0??;84B C74 ?A4?>=34A0=24 >5 C74 4E834=24 BC0=30A3 F74= 34C4A < 8=8=6 F74C74A C78B ?>;82H 70B 144= E8>;0C43 ' A4?>=34A0=24 >5 C74 4E834=24 < 40=B C70C 8C 8B < >A4 ;8 : 4;H C70= =>C C70C 0 ?>;82H E8>;0C8>= >22DAA43

D)2#)0,) . !18 S ! . #3)/ . 2 ! . $ R% - %$)%2

=H 38B28?;8=0AH B0=2C8>=B >A A4 < 4384B 142>< 4 45542C8E4 F74= C74 34C4A < 8=0C8>= A460A38=6 A4B?>=B818;8CH 8B M=0; 4CO8;B A460A38=6 B0=2C8>=B 0=3 A4 < 4384B 0A4 5>D=3 8= C74 ' A>243DA4B 5>A *8C;4 ! .) 4GD0; $ 8B2>=3D2C (4B?>=B4 B44 (4;0C43 !=5>A < 0C8>=

N/ . -P4 .)3)5% R%20/ . 2%

*74 +=8E4AB8CH < 0H A4B?>=3 C> 2>=3D2C C70C 3>4B =>C < 44C C74 34M=8C8>= >5 0 ?>;82H E8>;0C8>= 1H C0 : 8=6 =>= ?D=8C8E4 02C8>= 34B86=43 C> ?A>< >C4 0 F4;2>< 8=6 8=2;DB8E4 0=3 B054 4=E8A>= < 4=C

T) - % F1 ! - % &/1 C/ - 0,%3)/ . /& G1)%5 ! . #% P1/#%22

+% F8;; 20AAH >DC C74 6A84E0=24 ?A>24BB 8= 0 A40B>=01;4 0=3 C8 < 4;H < 0==4A *74 ;4=6C7 >5 C8 < 4

COPY

COPY

0A0BB<4=C '>;82H 0=3 C74 *8C;4!.)4GD0; $8B2>=3D2C '>;82H 5>A>=4 8=2834=C !5 5>D=3 A4B?>=B81;4 C74 A4B?>=34=C F8;; =>C A4248E4 3D?;8220C4 38B28?;8=0AH 02C8>=B 5>A 2>=3D2C C70C E8>;0C4B 1>C7 ?>;8284B

RESPONSIBILITIES

A$5)2/12: P!138-C(/2%.	L '>E834 BD??>AC 6D830=24 0=3 03E824 C> C74 ?0ACH 3DA8=6 6A84E0=24 ?A>24438=6B L 22><?0=H C74 ?0ACH C> <44C8=6B >A ?A>24438=6B 0B A4@D4BC43 1H C74 ?0ACH L B: 0;; @D4BC8>=B >5 C74 >??>B8=6 ?0ACH 0=3 0;; F8C=4BB4B >= 1470;5 >5 C74 ?0ACH 0C C74 ;8E4 740A8=6 L '4B4=C C74 ?0ACH B >?4=8=6 0=3 >A 2;>B8=6 BC0C4<4=CB 85 A4@D4BC43 1H ?0ACH
A$5)2/12 UND-A00/).3%$	L CC4=3 ?A4 740A8=6 2>=54A4=24 L B: 0;; @D4BC8>=B 0B 834=C8M43 1H C74 ?0ACH >5 C74 >??>B8=6 ?0ACH 0=3 0;; F8C=4BB4B >= 1470;5 >5 C74 ?0ACH 0C C74 ;8E4 740A8=6 L (403 C74 ?0ACH B >?4=8=6 0=3 >A 2;>B8=6 BC0C4<4=CB 85 A4@D4BC43 0=3 ?A>E8343 1H C74 ?0ACH L ><?;4C4 A4@D8A43 CA08=8=6
C/--4.)38 S3!.$!1$2 & C!1% N%36/1+	L BB8BC BCD34=CB 8= D=34ABC0=38=6 C748A A867CB A4B?>=B818;8C84B 0=3 >?C8>=B 5>A A4?>AC8=6 0=3 BD??>AC L (4248E4 A4?>ACB >5 B4GD0; <8B2>=3D2C 8=E>;E8=6 BCD34=CB L '>E834 BD??>AC C> BCD34=CB L BB8BC 8= C74 6A84E0=24 ?A>243DA4 5>A BCD34=CB
D%#)2)/.-M!+%12	L &E4AB44 C74 ;8E4 740A8=6 74;3 0B ?0AC >5 C74 6A84E0=24 ?A>24BB 4=BDA8=6 C70C 0= 4@D8C01;4 ?A>24BB 8B 5>;;>F43 L (4E84F C74 8=E4BC860C8E4 A4?>AC 0=3 2>=B834A 4E834=24 ?A4B4=C43 0C C74 740A8=6 L !BBD4 0 508A 0=3 8<?0AC80; FA8CC4= 34C4A<8=0C8>=A460A38=6 A4B?>=B818;8CH 5>A C74 0;;4643 E8>;0C8>=C70C 8B 10B43 D?>= C74 4E834=24 ?A4B4=C43 L (4248E4 0=3 A4B>;E4 0=H 0??40; 8= 0 508A 0=3 8<?0AC80; <0==4A L ><?;4C4 A4@D8A43 CA08=8=6

COPY

E - 0,/8%%2 (%7#%03 - /23 234$%.3 % - 0,/8%%2)	L) 70A4 8=5>A<0C8>= 01>DC 8=28 34=CB >5 ?>C4=C80; B4GD0; <8B2>=3D2C F8C7 C74 *8C;4 !. 2>>A38=0C>A 0B B>>= 0B ?>BB81;4
I.&/1 - !, R%2/,43)/. F!#),)3!3/12	L 028;8C0C4 8=5>A<0; A4B>;DC8>= ?A>24BB4B F8C7>DC 2>=N82C >5 8=C4A4BC >A 1810B L A05C 0 A4B>;DC8>= 06A44<4=C C70C 022DA0C4;H A4N42CB C74 ?0AC84B 06A443 D?>= A4B>;DC8>= L ><?;4C4 A4@D8A43 CA08=8=6
I.5%23)' !3/12	L >=3D2C 0= D=1810B43 502C 60C74A8=6 ?A>24BB L)4=3 0;; =>C >C74AF8B4 8<?4A<8BB81;4 4E834=24 >1C08=43 0B ?0AC >5 C74 8=E4BC860C8>= C> C74 ?0AC84B 0=3 C748A 03E8B>A 85 0=H L A40C4 0= 8=E4BC860C8E4 A4?>AC C70C 5082A;H BD<<0A8I4B A4;4E0=C 4E834=24 0=3 B4=3 8C C> C74 ?0AC84B 0=3 C748A 03E8B>AB 85 0=H L ><?;4C4 A4@D8A43 CA08=8=6
S34$%.32, E - 0,/8%%2 !.$ O3(%1 C! - 042 C/ - - 4.)38 M% - "%12	L 'A02C824 1HBC0=34A 8=C4AE4=C8>= L +B4 F>A3B 0=3 02C8>=B C> B7>F >DA 2><<8C<4=C C><0 8=CO8=8=6 0 B054 20<?DB 2;8<0C4
T)3,% IX C//1$).!3/1 !.$ D%0438 T)3,% IX C//1$).!3/12	L >>A38=0C4 C74 +=8E4AB8CH B 2><?;80=24 F8C7 *8C;4 !. 8=2;D38=6 C74 +=8E4AB8CH B 6A84E0=24 ?A>243DA4B 5>A A4B>;E8=6 A4?>ACB >5 B4GD0; <8B2>=3D2C L &E4AB44 0;; B4GD0; <8B2>=3D2C 2><?;08=CB 834=C85H8=6 0=3 033A4BB8=6 0=H ?0CC4A=B >A BHBC4<82 ?A>1;4<B C70C 0A8B4 3DA8=6 C74 A4E84F >5 BD27 2><?;08=CB L BB8BC BCD34=CB 0=3 4<?;>H44B 8= D=34ABC0=38=6 C748A A867CB A4B?>=B818;8C84B 0=3 >?C8>=B 5>A A4?>AC8=6 0=3 BD??>AC L 8B2DBB BD??>AC8E4 <40BDA4B F8C7 2><?;08=0=C 0=3 A4B?>=34=CB L !<?;4<4=C BD??>AC8E4 <40BDA4B 0B 0??A>?A80C4 L (4248E4 A4?>ACB >5 B4GD0; <8B2>=3D2C L !=E4BC860C4 >A >E4AB44 8=E4BC860C8>= >5 2><?;08=CB >5 B4GD0; <8B2>=3D2C L 'A>E834 >E4AB867C 5>A 8=E4BC860C8>=B 0=3 A4B>;DC8>= >5 0;; B4GD0; <8B2>=3D2C 2><?;08=CB

COPY

	L 028;8C0C4 8=5>A<0; A4B>;DC8>= ?A>24BB4B L $>=8C>A +% B 43D20C8>= ?A>6A0< >A 02C8E8CH 5>A 10AA84AB C> A4?>AC8=6 8=5>A<0C8>= 01>DC 2>=3D2C C70C A40B>=01;H <0H 2>=BC8CDC4 B4GD0; <8B2>=3D2C 0=3 C0:4 BC4?B A40B>=01;H 20;2D;0C43 C> 033A4BB BD27 10AA84AB L ><?;4C4 A4@D8A43 CA08=8=6
U.)5%12)38 P/,)#% D%0!13 - %.3	L (4E84F 0=3 <>385H 85 =424BB0AH ?7HB820; BDAA>D=38=6B C> 4=70=24 B42DA8CH 0=3 B054CH >= 20<?DB L 'A>E834 8=?DC 0=3 ?4AB>==4; 5>A 43D20C8>= ?A>6A0<B L '4A5>A< 2A8<8=0; 8=E4BC860C8>=B

RELATED INFORMATION

L +) JJ K *8C;4!. >5 C74 3D20C8>= <4=3<4=CB >5 *8C;4!.

L ('OAC %>=38B2A8<8=0C8>= >= C74 0B8B >5)4G 8= 3D20C8>=

L ('OAC K !=BC8CDC8>=0;)42DA8CH '>;8284B 0=3 A8<4)C0C8BC82B 0:0 "40==4 ;4AH 8B2;>BDA4 >5 0<?DB)42DA8CH '>;82H 0=3 0<?DB A8<4)C0C8BC82B 2C ;4AH 2C

L +) JJ K ,8>;4=24 608=BC -><4= (40DC7>A8IOC8>= 2C >5 , -

L +) 7 K *8C;4 ,!! >5 C74 8E8; (867CB 2C >5 *8C;4 ,!!

L % J K *8C;4!. A42>A3B 4G4<?C

L % J K 0<?DB A44)?4427 '>;82H

L %>AC7 0:>C0 +=8E

COPY

- +%)CO55 0=31>>:
- +% *8C;4 ! . >>A38=0C>AB 4?DCH >>A38=0C>AB

FORMS

- =>=H<>DB A8<4 (4?>AC >A<
- (4?>AC)4GD0; $8B2>=3D2C >A<

APPENDICES

- ??4=38G D830=24 >= >=B4=C 0=3 !=20?028C0C8>=)44 CC027<4=CB

CC027<4=CB

??4=38G D830=24 >= >=B4=C 0=3 !=20?028C0C8>=

??A>E0;)86=0CDA4B

Step Description	Approver	Date
'>;82H &O24	"4==854A (>64AB 8A42C>A >5 +=8E4AB8CH '>;82H	
'>;82H &F=4A	>==0)<8C7 BB8BC0=C , ' 5>A @D0; &??>ACD=8CH *8C;4 ! .	

(454A4=24B

;4AH 2C % % +) ($0=D0;) '>;82H *8C;4 ! . *8C;4 , !! +% '>;82H +% 'A>243DA4 , -

COPY