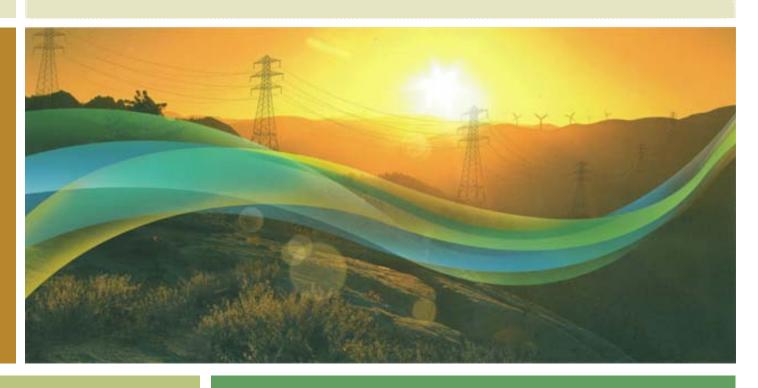
Acceptance of Review of Code of Conduct Certification Process



Michael Epstein, Controller



Board of Governors ADR/Audit Committee –General Session January 28-29, 2008

The Code of Conduct Certification Process

- Bylaws incorporate the Code of Conduct
- Bylaws require an annual certification of compliance by:
 - Employees
 - Substantially full time contractors
 - defined as those that work 30+ hours per week for more than 6 months during year
 - Board of Governors
- Tariff requires an annual audit
- PricewaterhouseCoopers reported on compliance with annual certification process as described in bylaws.



What Does it Mean to Comply

Certifications

- Employees and contractors certify they have received, and agree to comply with Code of Conduct, Information Security Policy,
 Workplace Violence Prevention Policy and Fitness for Duty Policy
- Governor's certify they have received and agree to comply with the Code of Conduct

Audit Scope

- Obtained listing of each constituent group
- Compared listing of all members of each class to signed certifications as of November 25, 2007
- For employees compared listing to payroll register
- No exceptions were noted

