

<b>TITLE:</b> Performance Evaluations	<b>POLICY DESCRIPTION:</b> Annual Performance Evaluation Including Code of Conduct
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<b>EFFECTIVE DATE:</b> September 1, 2005	<b>REFERENCE NUMBER:</b> HPG.012

<p><b>SCOPE:</b> All HPG Colleagues in all HPG departments.</p>
<p><b>PURPOSE:</b> As a standard of performance common to all HPG Colleagues identified within the scope of this policy, an element of the annual performance evaluation shall include knowledge of an adherence to the Code of Conduct for HPG.</p>
<p><b>POLICY:</b> In order to inculcate HPG’s mission and values to its colleagues, and to emphasize the high level of importance placed on these standards by HPG, all HPG Colleagues will be assessed annually against a performance standard relative to their promotion of and adherence to the Code of Conduct.</p>
<p><b>PROCEDURE:</b> Performance standards relative to the promotion of and adherence to the Code of Conduct will be included in all performance appraisals at least annually. Each HPG manager and/or supervisor is responsible for incorporating this standard in their performance appraisal process.</p> <ol style="list-style-type: none"> <li>1. All HPG Colleagues will be held accountable for behaviors displayed relative to the values articulated in the Code of Conduct: “We act with absolute honesty, integrity and fairness in the way we conduct our business and the way we live our lives.”</li> <li>2. All HPG Colleagues will be held accountable for attending training regarding the Code of Conduct program at least annually.</li> <li>3. In addition to the above, managers and supervisors will be held accountable for setting an example, to be in every respect a model and ensuring that those on their team have sufficient information to comply with laws, regulations, and policies, as well as the resources to resolve ethical dilemmas.</li> <li>4. The assessment of all HPG Colleagues against these standards of performance will be documented on the evaluation form and made a part of each employee’s personnel file.</li> </ol> <p>Examples of questions to include on annual performance appraisal forms include:</p> <p><u>For non-managerial HPG Colleagues</u></p> <ol style="list-style-type: none"> <li>1. Does the employee demonstrate an understanding of and adherence to the Code of Conduct?</li> <li>2. Does the employee’s conduct reflect HPG’s values and a commitment to the Code of Conduct?</li> </ol> <p><u>For Managerial HPG Colleagues</u></p> <ol style="list-style-type: none"> <li>1. Does the manager’s conduct reinforce HPG’s values and promote the Code of Conduct?</li> <li>2. Does the manager meet his or her leadership obligations under HPG’s Ethics and Compliance Program?</li> </ol>