**Scope**: This procedure applies to all U.S. facilities and offices of PCB and its subsidiaries.

**Purpose**:

To assure that the proper recording and handling of unscheduled visits of government enforcement officials to PCB. This is important to us at PCB because we must comply with all applicable laws and ensure that the proper personnel are involved in any such visits.

This policy applies to all visits of government enforcement officials.

**Procedure**:

1. **Visits to PCB by Government Enforcement Officials**
	1. **Ensuring a Successful Visit –** The following steps are to be followed in the event of a visit to PCB or an affiliated company by any government enforcement officials (e.g., Office of Export Enforcement, Immigration, Customs Enforcement, Department of Labor, OSHA):
		1. At all times, be courteous to and cooperative with the government agent(s).
		2. Sign-in the visitor in a manner consistent with company policy (see LC1003 User Guide: Visitor Notification Policy).
		3. At the outset, ask for identification from the agent(s) if it is not offered (they generally provide identification and credentials upon their arrival).
		4. Make a copy of the credentials for our internal company records.
		5. Bring the visiting agent(s) to the main reception area of the facility.
		6. **Do not begin substantive discussions until the Onsite Host (described below) is present and the appropriate subject matter person referenced below is present or is joined by telephone.**
	2. **Escalating to a Host**
		1. Contact the following person (“Onsite Host”) in the following order of preference:
			1. Depew -
2. General Counsel – Sensors
3. Export Manager
4. Associate General Counsel – Sensors
5. PCB President
	* + 1. Halifax, NC Facility –
6. N.C. General Manager
7. N.C. Human Resources Generalist
	* + 1. Provo, UT Facility
8. Director LD Operations (General Manager)
9. LD Quality Assurance Manager
	* + 1. Accumetrics –
10. General Manager
11. Engineering Manager
	* + 1. The Modal Shop –
12. President
13. Human Resources Lead
	* + 1. Farmington Hills, Michigan Facility
14. Operations Manager
15. LT Quality Assurance Manager
	* 1. The Onsite Host will act as host of the visit. Before beginning substantive discussions, the Onsite Host should contact the following individual(s), as applicable (if not already a part of the meeting). It should be explained that PCB’s policy requires the involvement of the appropriate subject matter people:
			1. Export Manager (if the Government enforcement official’s visit relates to an import or export matter) **and** the General Counsel – Sensors.
			2. VP – Human Resources **and** General Counsel – Sensors – if the matter relates to a labor and employment matter.
			3. General Counsel – Sensors – if the matter relates to any other matter. If the General Counsel – Sensors is not available, the Associate General Counsel – Sensors should be contacted.
		2. Once the appropriate people are present (in person or by telephone or video conference):
			1. Confirm the verification of the credentials of the agent(s) (badge, identification card), and make sure that a business card has been obtained from the agent(s).
			2. Inquire about the purpose of the meeting. If it is indicated that PCB or an affiliate is under investigation, PCB Legal will advise and consult with the President of PCB and with MTS Office of Risk & Compliance as soon as possible. It is in the discretion of PCB Legal whether this notification occur during the meeting or can be made after the meeting.
			3. Take detailed notes of the meeting, including topics, dates, names of companies or individuals mentioned, and questions asked and answers provided.
		3. **Providing Documents to Government Officials - i**t is generally PCB’s preference not to provide documents upon demand at the time of the visit, unless this is required by subpoena.
			1. **Documents Requested Without a Subpoena**: Politely advise the agent that PCB will promptly review this matter with our Senior Leadership and respond as soon as possible. The Onsite Host should confirm the address to which requested documents should be sent. Documentation requested by officials from OSHA or the Department of Labor may be provided to the representative if approved by the Vice President of HR and Legal Counsel.
* Requested documents that are not required by subpoena should be collected promptly and reviewed, as applicable, by management, Legal Counsel and the Office of Risk and Compliance prior to forwarding to the government agent.
* Prior to providing a copy of the required documents, a **complete electronic copy of all documents to be provided** shall be made. Such electronic copy shall be retained on file in both the facility HR department (see CS002) and the Legal department. Only in this way can we be sure of having accurate records of what has been provided to the government.
	+ - 1. **Documents requested immediately with Subpoena:** If a subpoena is served and documents (originals or copies) are required to be surrendered to the agent(s) on the spot:
* Make a complete copy of all documents to be provided as set forth immediately above in A.2.4.1 prior to giving them to the agent(s). If the subpoena demands original records, a complete electronic copy shall be made and retained on file in both the facility HR department (see CS002) and the Legal department. Only in this way can we be sure of having accurate records of what has been provided to the government.
* If the subpoena provides that copies may be provided to the government rather than originals, after making required copies, all originals shall be returned to their original file location.
* Ask the agent(s) to provide a receipt for the documents that are provided and forward this receipt to the Export Manager, Vice President of HR (If applicable) and/or Legal department for filing and retention requirements of CS002.
	1. After the visit is concluded, the PCB host shall provide an oral summary to the PCB President and General Counsel – Sensors, and Vice President of HR (if applicable) (if not present at the meeting), followed promptly by a written meeting summary, including the notes taken during the meeting. The Office of Risk and Compliance and, as applicable, MTS Corporate HR and the MTS Office of General Counsel, must also be contacted as soon as possible. Records pertaining to the visit (meeting summary, meeting notes, copies of documents provided to the government, etc.) are to be maintained with the General Counsel per requirements of CS002. A copy should also be given to HR if applicable.
	2. Again, remember at all times to be pleasant to and cooperative with the visiting

 Government agent(s).

**Referenced Documents:**

 **LC1003, CS002**