



GUIDELINES FOR ESTABLISHING ETHICAL DIVIDERS

The following general guidelines should be considered when establishing or assessing the adequacy of an entity's ethical barriers or other measures that an organization has put in place to screen Restricted Parties.

These guidelines should be adapted to each individual situation:

- a) The Firm must ensure that the Restricted Party does not have any involvement in the Firm's preparation of responses to any element of the Competitive Selection Process (for example, the Project's RFQ or RFP, any interview process or other meetings.)
- b) The Firm must ensure that the Restricted Party does not discuss the Project or any information relating to the Project with anyone else forming part of or employed or engaged by the Firm and that the Restricted Party is not put in a position where such discussions can occur or be overheard.
- c) No other member of the Firm can discuss the Project with the Restricted Party.
- d) The Firm must segregate all files, including computer files, relating to the Project and, the Restricted Party's files must be physically and electronically segregated (as applicable) in a secure manner from the Firm's regular filing and document management systems, and be accessible only by the Restricted Party.
- e) No member of the Firm may disclose to, or discuss with, the Restricted Party any documents relating to the Firm's intended response in the Competitive Selection Process, including the RFQ and RFP.
- f) The measures taken by the Firm to screen the Restricted Party must be stated in a written policy explained to all employees, and contractors as applicable, who are involved in the preparation of the responses supported by a warning that violation of the policy may result in sanctions, up to and including dismissal or termination.
- g) Affidavits, or declarations, or other acceptable evidence of compliance, may be required by the Relationship Review Committee from (i) the Restricted Party and (ii) other appropriate organization members (including all those directly involved in the Competitive Selection Process on behalf of the organization, including those preparing responses to the Project's RFQ or RFP) setting out that they have adhered to and will continue to adhere to all elements of the screen.
- h) The Restricted Party's office or workstation must be at a separate location or otherwise adequately and securely segregated from the offices or workstations of those working on responses to the Project's Competitive Selection Process (including the RFQ and RFP).
- i) The Restricted Party must use support staff different from those working on responses to the Project's RFQ or RFP and the support staff must be cautioned and subject to the same restrictions as the Restricted Party.