

Preventing Global Corruption

NEW HIRE COMPLIANCE CHECKLIST

What Do I Do for New Hires?

• It is critical that distributors of Owens & Minor Halyard products train their entire workforce on compliance expectations. Use this checklist to ensure that all new hires understand all compliance requirements.

How Do I Train New Hires?

- Explain your corporate mission and values stress your commitment to ethical business practices.
- Set up-front expectations all employees should work with a sense of integrity and not violate any laws, codes or policies.
- Review your country's requirements regarding other compliance topics (i.e. Privacy, Fraud, Social Compliance, etc.)
- Provide new hires with the following documents:
 - A copy of your Code of Conduct
 - o A copy of the Owens & Minor Vendor Code of Conduct
 - o A copy of any internal compliance policies or resources you have
- Direct your employees to the Owens & Minor Toolkit
 - Ask that they complete the Anticorruption Training module
 - o Demonstrate the resources provided in the Toolkit
 - Using the O&M Toolkit, show your employees how they can ask questions and report concerns – encourage transparency and reinforce that retaliation is prohibited
- Once your new employee has had time to review the materials in the toolkit and take the Preventing Global Corruption eLearning, ask if they have any questions. It is a best practice to document your new hire training program and to have new hires attest, in writing, to abide by your Code of Conduct and ethical business practices.