

<b>Standards of Conduct (Transmission)</b>  <b>Policy 4 – Compliance Review</b>	<b>Revision: B</b>  <b>Effective Date:</b> <b>10/09/18</b>	<b>Author: General Counsel (Central Region)</b>  <u>Sarah B. Knowlton</u> <small>Sarah B. Knowlton (Oct 5, 2018)</small>
<b>Approval Signature(s) and date:</b> <u>Mary Ellen Paravalos</u> <small>Mary Ellen Paravalos (Oct 23, 2018)</small> <b>Chief Compliance and Risk Officer</b>		

**Revision History**

Revision	Date	Changes	Approved By
A	08/16/17	Created New Documentation	L. Beirsto
B	10/09/18	Annual Review; Changed Chief Compliance Officer to Chief Compliance and Risk Officer and approver from J. Tindale to M. Paravalos	M. Paravalos

**PRINCIPLE:**

This policy addresses how the APUC Transmission Providers will ensure compliance with Standards of Conduct requirements governing disclosures of non-public transmission information, including access to transmission areas and databases as well as electronic communications.

**PRACTICE:**

- I. Annually, the APUC Transmission Providers shall assess the performance of compliance with Standards of Conduct requirements by utilizing some or all of these methods:
  - a. review a sample from the magnetic card reader system reports for areas which have restricted access to protect Transmission Function information;
  - b. review a sample from the visitor access logs for improper access to the restricted areas;
  - c. review a sample from the shared electronic systems including the transmission function operating system, energy accounting systems, and any other shared electronic systems to review security access is properly updated and maintained; or
  - d. random selection of and review of content of telephonic and electronic communications between Transmission Function Employees and Marketing Function Employees.
  
- II. Documentation of the assessments shall be retained for a period of five years.

APUC will maintain a record of calls and/or reports made to the Chief Compliance and Risk Officer under the APUC SOC Procedures.