

### Items for Consideration When Evaluating Contest Submissions\*

1. Provide a history or general background of the company.
2. Describe the corporate ownership structure.
3. Provide a copy of the company's organization chart.
4. Describe how the violation(s) occurred.
5. Has information regarding the violation(s) been discussed with the employees?
6. Has the company issued any policy statements to employees since the violation(s) occurred?
7. Has the company had any other environment notices of violation, incidents, or pending issues associated with the company since the relevant time period of the misconduct through the present?
8. Does the company have any current or potential federal government contracts, grants, loans, or other covered transactions in which the company is currently engaged or intends to pursue?
9. What is the current number of employees, including part-time, full-time, or seasonal, for the company?
10. Does the company have any employees that are limited English proficient (who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English)?
11. How many employees have jobs or job responsibilities that impact or are related to environmental compliance or operations that have an environmental impact?
12. Please identify the company management personnel with environmental compliance responsibilities and describe in detail those responsibilities.
13. Please identify the company employees that have job responsibilities with environmental impact and describe in detail those responsibilities.
14. Please describe and provide a copy of any corporate environmental compliance program/corporate oversight program. How long has this program, if any, been in place?
15. Does the company have a hotline program in place? If so, describe how the hotline operates.
16. Is there a central management point of contact for environmental compliance?
17. Describe and provide documentation of any environmental training program before and after the violation(s).
18. Describe and provide documentation of any ethics training program before and after the violation(s).
19. What is the status and content of any Plea Agreement concerning the violations(s)?
20. What are the potential fines and/or restitution involved?
21. How has the violation changed the company?
22. Does the company use subcontractors? If so, what environmental work is conducted by subcontractors?
23. Does the company use any independent auditors or consultants to assist in environmental compliance? If so, please identify such auditors or consultants, provide copies of reports, and describe how they are used.

\* This list is not exhaustive and we may consider all, none, or additional items as we deem necessary and appropriate in accordance with the facts of the specific matter in question.