

	D&B	Guralp	ICBL	Polycom	Cognizant	Quad/Graphics
<b>Date</b>	<b>4/23/18</b>	<b>8/20/18</b>	<b>8/23/18</b>	<b>12/20/18</b>	<b>2/13/19</b>	<b>9/19/19</b>
<b>Voluntary Self-Disclosure</b>	<ul style="list-style-type: none"> <li>identification of misconduct</li> <li>prompt, voluntary self-disclosure</li> </ul>	<ul style="list-style-type: none"> <li>voluntary self-disclosure</li> </ul>	<ul style="list-style-type: none"> <li>timely, voluntary self-disclosure</li> </ul>	<ul style="list-style-type: none"> <li>identification of misconduct</li> <li>prompt, voluntary self-disclosure</li> </ul>	<ul style="list-style-type: none"> <li>voluntary self-disclosure within 2 weeks of board learning of criminal conduct</li> </ul>	<ul style="list-style-type: none"> <li>prompt, voluntary self-disclosure</li> </ul>
<b>Full Cooperation</b>	<ul style="list-style-type: none"> <li>thorough investigation</li> <li>identifying all individuals involved in or responsible for the misconduct</li> <li>providing DOJ with all facts relating to the misconduct</li> <li>making current and former employees available for interviews</li> <li>translating foreign-language documents to English</li> </ul>	<ul style="list-style-type: none"> <li>“substantial cooperation”</li> <li>voluntary production of relevant documents and information</li> <li>cooperation in DOJ’s prosecution of recipient of improper payments</li> </ul>	<ul style="list-style-type: none"> <li>thorough and comprehensive investigation</li> <li>provision of all known relevant facts about misconduct</li> <li>agreement to continue to cooperate in DOJ’s ongoing investigations / prosecutions</li> </ul>	<ul style="list-style-type: none"> <li>thorough investigation</li> <li>providing DOJ all facts relating to misconduct</li> <li>making employees available for interviews</li> <li>assisting in DOJ’s efforts to interview a former employee</li> <li>translating foreign-language documents into English</li> <li>identifying unrelated misconduct to DOJ for investigation and potential prosecution</li> <li>agreeing to continue cooperating in DOJ’s ongoing investigations / prosecutions</li> </ul>	<ul style="list-style-type: none"> <li>thorough and comprehensive investigation</li> <li>provision of all known relevant facts about misconduct</li> <li>agreement to continue to cooperate in DOJ’s ongoing investigations / prosecutions</li> <li>facilitation of DOJ’s investigation of culpable individuals</li> </ul>	<ul style="list-style-type: none"> <li>thorough and comprehensive investigation</li> <li>provision of all known relevant facts about misconduct</li> <li>agreement to cooperate in DOJ’s ongoing investigation and related prosecutions</li> </ul>
<b>Timely and Appropriate Remediation</b>	<ul style="list-style-type: none"> <li>enhancement of compliance program and internal accounting controls</li> <li>termination of 11 individuals involved in misconduct (including an officer and other senior employees)</li> <li>discipline of other employees via reduced bonuses, reduced salaries, lowered performance reviews, and formal reprimands</li> <li>disgorgement in an amount determined by SEC</li> </ul>	<ul style="list-style-type: none"> <li>“significant remedial efforts”</li> <li>commitment to accept responsibility for misconduct in parallel proceeding before UK’s Serious Fraud Office</li> </ul>	<ul style="list-style-type: none"> <li>enhancement of compliance program and internal accounting controls</li> <li>termination of all executives and employees involved in misconduct</li> <li>\$93,940.19 disgorgement</li> </ul>	<ul style="list-style-type: none"> <li>enhancement of compliance program and internal accounting controls</li> <li>termination of 8 individuals involved in misconduct</li> <li>discipline of 18 other employees</li> <li>termination of company’s relationship with channel partner</li> <li>\$30,978,000 disgorgement</li> </ul>	<ul style="list-style-type: none"> <li>termination / discipline of employees / contractors involved in misconduct</li> <li>payment of \$6 million CMP to SEC</li> <li>disgorgement of \$19,370,561</li> </ul>	<ul style="list-style-type: none"> <li>enhancements to compliance program</li> <li>termination of individuals involved in misconduct</li> <li>termination of company’s relationship with third parties involved in misconduct in Latin America</li> <li>discontinuation of company’s relationships with employees and third parties in China involved in misconduct</li> <li>agreement to disgorge full amount of ill-gotten gains to SEC</li> </ul>