ISSUE MANAGEMENT PROTOCOL

An issue management protocol is essential to effectively responding to any crisis situation. It is designed to implement a clear decision-making infrastructure that allows the CLIENT to manage any potentially high-profile and sensitive matter.

This protocol ensures a streamlined process by having the appropriate public affairs tools in place to act quickly, effectively, and cohesively with key audiences including:

- Media
- Congressional Committees and Staff
- Law Enforcement and Federal Investigators
- Senior Management of Company
- Employees
- Other External Stakeholders (i.e. Business Partners, Investors, Customers, etc.)

IMMEDIATE STEPS

1) **Create a Response Staff & Structure:**

- **Issue Management Team:** An issue management team (IMT), defined by responsibility area, needs to be identified and specifically tasked with managing information flow and decision-making. It will include:

  i. **Leadership:**
     - ➢ CLIENT EXECUTIVES OR DESIGNEE
     - ➢ CLIENT GENERAL COUNSEL OR DESIGNEE
     - ➢ CLIENT GOVERNMENT RELATIONS/ COMMUNICATIONS OR DESIGNEE

  ii. **Legal Counsel:**
     - ➢ EXTERNAL LAW FIRM
       - ▪ JOHN SMITH
       - ▪ JOAN SMITH

  iii. **Public Affairs and Communications:**
     - ➢ PUBLIC AFFAIRS/CRISIS MANAGEMENT TEAM

- **Coordination and Information Gathering:** To facilitate information sharing, decision-making and news tracking, the IMT should immediately hold a coordination meeting to assess situation, share facts and assign relevant tasks. Following this initial meeting, IMT should hold daily check-in meetings as the situation develops to review any public or non-public developments.

- **Media and Web Monitoring:** The IMT will designate a member to monitor news media and social media to ensure awareness of coverage and analysis as it happens.

2) **Gain Control of all Relevant Client Information and all Outside Contacts**
    - Law firm works with client General Counsel to send out "hold" memorandum to employees
    - Law firm coordinates with General Counsel the development of an "internal" investigation by law firm to determine the scope of client risk before Congress
    - Law firm and IMT develop a protocol for answering inquiries from Congress and the media – any employee contacted by press or Congressional staff immediately contacts General Counsel who in turn convenes the IMT to develop prompt and appropriate response.

3) **Scenario Planning:** The IMT will identify and prepare response for all possible outcomes and scenarios, including but not limited to:

- Congressional inquires or subpoenas
- Congressional hearings
- Regulatory and/or criminal inquiries or subpoenas
- Civil litigation

4) **Development of Message and Related Materials:** The IMT will develop and approve:

- Holding statements
- Press Release (if necessary)

- Key message points
- Fact sheets and tough/pro-active Q&As
- Employee or other business communications

5) **Stakeholder Engagement:** As the situation develops, CLIENT will need to engage with and respond to a variety of stakeholders including, but not limited to, the below:

   - Senior Management Team at Company
   - Employees
   - Business Partners
   - Customers

6) **Media Lists and Spokesperson Preparation:** As events unfold, the media may cover this matter. The IMT will develop a process that identifies the appropriate point of contact to coordinate all incoming inquiries which will include:

   - Developing media list of potential reporters
   - Draft and approve appropriate messaging for each spokesperson
   - Message training on key points and tough Q&As
   - Media and hearing trainings
   - Identify deadlines and schedule