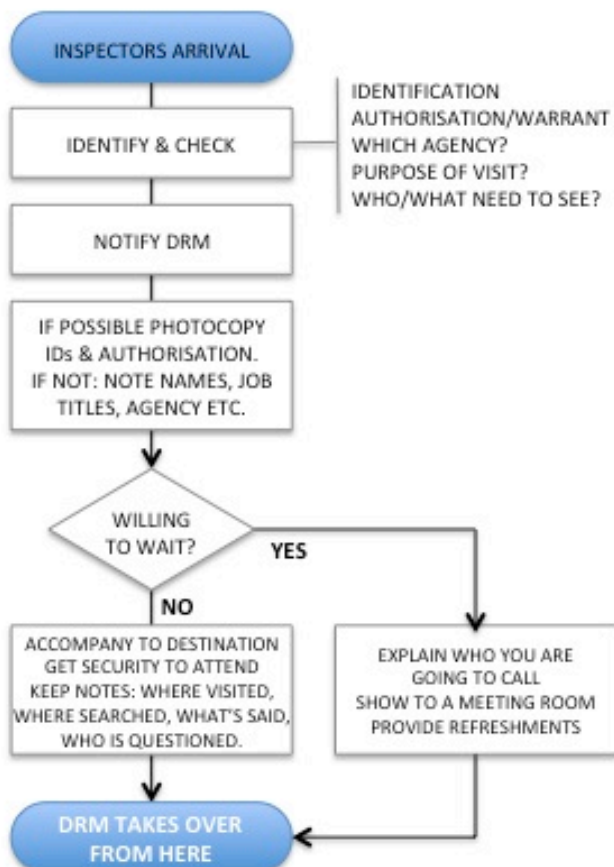


WHAT IS A DAWN RAID?

Various government authorities or agencies can carry out an inspection, with or without notice, to search for documents and ask questions. Such investigations, although mostly conducted during business hours are commonly known as 'Dawn Raids'. While rare, any such visit may cause major disruption for your business and may signal the start of protracted proceedings, potentially leading to fines, damages actions and, in some jurisdictions, personal sanctions for individuals and disqualification for directors.

PLANNING

- You should appoint and train a Dawn Raid Manager (DRM) who will be responsible for overseeing any such visit.
- Ensure that the DRM has a nominated alternate.
- Provide instructions to reception and security staff about who to call in the event of such a visit.
- Discuss your arrangements with your legal representatives and consider the appointment of an external lawyer. There are many law firms who offer specialist support in this area.



ROLES & RESPONSIBILITIES

- Reporting to senior management, the DRM should assist the inspectors and as far as is possible, oversee the visit.
- Reception staff, or first contact should follow the procedure shown alongside.
- Your 'legal representative' should oversee the legal implications that arise during any such visit.
- HR should manage the logistics and any resultant trauma arising from the visit.

GOLDEN RULES

- Verify the inspectors' authority.
- Understand their powers and scope.
- Keep a record/note of everything.
- Setup a control room with a photocopier.
- Do not leave inspectors unattended.
- Try to prevent inspectors from looking at legally privileged documents.
- Try to prevent inspectors asking questions outside their authority.
- Defer disagreement for later resolution and refer as soon as possible to your legal representative.