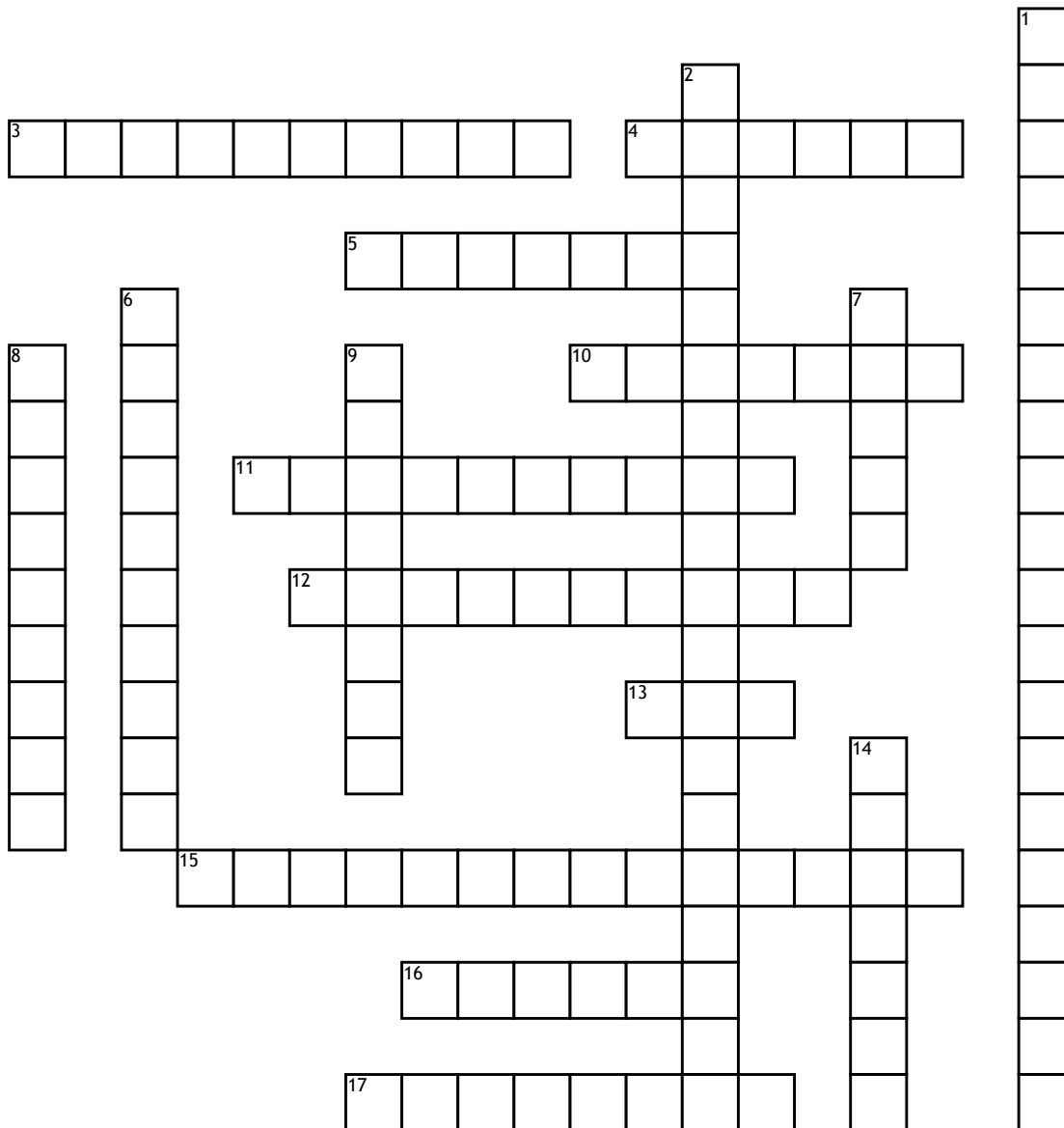


Compliance Crossword Puzzle



Across

3. An inappropriate gift exceeds \$_____ USD in value.
4. The Travel & Expense Policy governs transactions inputted into this system.
5. The Ethics & Compliance team encourages this type of culture.
10. The offer, solicitation, or acceptance of any improper payments, gratuities, gifts, or favors to obtain or retain business.
11. The Federal _____ Guidelines outline the seven elements of an effective compliance program.
12. Conduct that inappropriately interferes with our work, diminishes an employee's dignity or creates an intimidating, hostile or offensive work environment.

13. Tone at the _____.

15. Maintaining a diverse, respectful, fair, and productive work environment is our _____ to each other.

16. Per Realogy's Code of Conduct, every Realogy employee has a responsibility to promptly _____ any known violation or dishonest, unethical, or illegal conduct.

17. _____ Oxley Act was instituted in 2002, as a result of a series of high-profile financial scandals.

Down

1. Intangible asset created for, or licensed to, our company by employees, vendors, independent contractors or other third parties.

2. Their purpose is to provide effective input and oversight for the E&C program within Realogy.

6. Realogy's new hotline and disclosure platform is managed by this third-party vendor.

7. A deliberate false representation of company information or records.

8. Focus on this, because you can control it.

9. Frequency of employees renewing their commitment to the Code of Ethics by completing the Code of Ethics training and annual certification.

14. An anonymous way to report an ethics or compliance concern.