

FY09 Compliance Commitments

Store & Business Partner VOC

Objective: Receive monthly VOC at the SSC business customer VOC score greater than 7 & 90% supportive responses from Business Partner VOC

	Business Partner VOC		Store VOC	
	YTD Actual	YTD Goal	YTD Actual	YTD Goal
Compliance	85	90	-	-
Records	96	90	-	-
SOP	92	90	-	-
Dept Total	91²	90	7.69¹	7.0

Comments:

- Received a Store VOC Score of 10 for January 2010

¹YTD results calculated by averaging scores from Jan09-Aug09 and Dec09

²YTD results calculated by averaging the scores from all three teams within Corporate Compliance

Enhance the Brand

Objective: Increase Compliance awareness & customer service

- Responded to **3,772/3,777** inquiries within 24 hours (2,215 store associate/ 26 Field Support/ 1,505 internal associate/ 31 external)
- HDTV slides shown at Stores & SSC highlighting:
 - Conflicts of Interest
 - Awareness Line Contact Information
 - Records Management – Retention of Records
 - Gifts and Entertainment Policy
- Presented at 20 New Associate Orientations
- Completed Compliance Certifications for 1,270 Associates
- Held CCEW at the SSC to promote compliance awareness; distributed apron pins and whistleblower hotline information to over 3,000 SSC associates; results reported to the Audit Committee

myApron Enhancements

Objective: Consolidate & simplify Corporate Compliance material housed on THD's intranet

Behind Schedule	In Progress	Complete	Task Name	% Complete	Start	Finish
			myApron enhancements to Corporate Compliance page	73%	Mon 2/23/09	Fri 4/30/10
			Phase 1 - Discovery	100%	Mon 2/23/09	Fri 3/27/09
			Phase 2 - Webpage Requirements	100%	Fri 5/15/09	Fri 8/28/09
			Phase 3 - Webpage Design	100%	Mon 6/29/09	Mon 11/9/09
			Phase 4 - Webpage Development	43%	Wed 10/14/09	Fri 4/2/10
			Socialize Teams' new webpage concept with myApron Team	100%	Wed 10/14/09	Wed 12/2/09
			myApron Team tests "multiple LDAP" vs. "User language preference" RE. required la	0%	Mon 12/7/09	Fri 2/12/10
			New Department homepage	0%	Mon 2/15/10	Fri 3/5/10
			Translation of new Department homepage international content	0%	Mon 2/15/10	Fri 2/26/10
			myApron Team creates new landing page	0%	Mon 2/15/10	Fri 3/5/10
			New Compliance webpage(s)	43%	Mon 12/28/09	Fri 4/2/10
			Translation of Compliance international content	85%	Mon 12/28/09	Mon 1/25/10
			myApron Team modifies existing or creates new landing pages	0%	Mon 3/8/10	Fri 3/19/10
			Post existing content to new landing page(s)	0%	Mon 3/22/10	Fri 4/2/10
			New Records webpages	53%	Thu 12/3/09	Fri 2/26/10
			Identify Records Management content	100%	Thu 12/3/09	Fri 12/11/09
			Translation of international Records content as applicable	100%	Wed 12/16/09	Wed 12/30/09
			myApron Team creates new Records landing pages	0%	Mon 2/15/10	Fri 2/26/10
			Post new Records Management content to Documentum	0%	Mon 2/15/10	Fri 2/19/10
			Relocate SOP webpages to My Store tab	80%	Thu 12/3/09	Fri 3/12/10
			Translation of applicable international SOP content as determined by SOP team	100%	Thu 12/3/09	Thu 12/31/09
			myApron Team transitions tab location	0%	Mon 3/8/10	Fri 3/12/10
			Phase 5 - Webpage Testing	0%	Mon 3/1/10	Fri 4/16/10
			Phase 6 - Webpage Deployment	0%	Mon 3/8/10	Fri 4/30/10

Comments: Enhancement project delayed to Q1/10 pending new intranet tool

Monitor the Budget

Objective: Ensure department spend is below or inline with FY09 budget

YTD
Budget to Actual Variance -12%

KPI Reporting Summary

Objective: Define & report Compliance KPIs

Status	Current		Previous	
	#	%	#	%
Green	7	68	7	68
Yellow	1	11	1	11
Red	1	11	1	11

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Records Retention Simplification

Objective: Simplify the Store Records retention policy & reduce time commitment spent on non-customer facing activity

Completed Projects in 2009

- Rolled out new Records SOP to all stores in U.S.
- Purged ~35k boxes of records from Canadian Stores
- Purged ~19k boxes of records from the DCs
- Purged ~19k boxes of records from EXPO stores
- Rolled out secure shred bins at the SSC & field offices

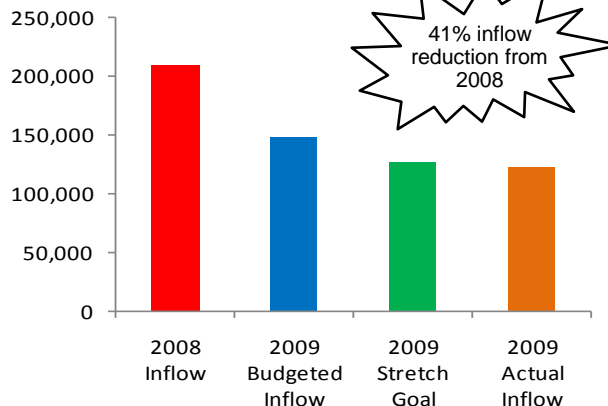
Projects to Carry-Forward to 2010

- New SOP for Canadian Stores
- New SOP for Distribution Centers
- Retention Schedule simplification at the SSC

Records Inflow Reduction

Objective: Reduce records inflow by 40%

Cubic Feet Inflow (Thousands)



Comments:

- Average monthly inflow before the new Records SOP – 16k; After – 2k

Monitor Storage Spend

Objective: Reduce non-storage fees and leverage Company-wide spend

Track savings here

Comments:

- 2009 non-storage fees under budget by ~25%

Supplier Alertline

Objective: Enhance Alertline awareness & standardize investigation methodology

Total Calls Resulting in an Investigation FY09	Invalid Reports FY09	Information Referrals FY09
XX	XX	XX

Comments:

- YTD Average time to close a valid case: XX days; median time: XX days

SOP Usability

Objective: Increase store associate usability of SOPs

Action Category	Due Date	Status
Search related changes:	10/30/2009	Complete
Update memo changes:	10/30/2009	Complete
SOP home page changes:	10/2/2009	Complete
SOP portal changes:	10/30/2009	Complete
SOP document related changes:	Ongoing	Ongoing

Comments

- All enhancements identified in the usability assessments are complete
- Changes to individual SOPs will be completed as they are reviewed with the business

