

Standards of Conduct Policy Training

Introduction

In the course of their work, many BC Hydro employees have access to detailed non-public information concerning British Columbia Transmission Corporation's (BCTC) activities.

All employees are required to be aware of this policy and their obligations under it. The Standards of Conduct (SOC) apply to all employees, contractors and consultants, including ABSU.

Affected and Support Employees, who carry out work for BCTC, and employees involved in energy marketing or transmission transaction groups are required to take specific training in the SOC policy and their responsibilities.

These training materials have been developed to help employees understand the SOC policy and will take approximately 20 minutes to complete.

Please ensure that once you have completed the training, you complete the confirmation sheet, which is the last page of this package, and send it to the Compliance Office to update your training record.

Code of Conduct

Although the Code of Conduct and the Standards of Conduct sound like slightly different names for the same thing, they are different policies:

- The Code of Conduct concerns ethical behaviour and conflict of interest.
- The SOC policy concerns the confidentiality of non-public BCTC transmission information. The SOC policy is the successor to the T&D Grid Operations SOC.

However, the SOC policy and the Code of Conduct do tie together. Therefore, if you have not completed the Code of Conduct training, you should do so after completing the SOC training. See the Corporate Policies and Procedures on the BC Hydro Intranet for more information.

In accordance with BC Hydro's Code of Conduct and Conduct Expectations Policy, all BC Hydro employees are expected to conduct their work affairs with honesty and integrity and any action taken by employees contrary to this principle will be considered a serious violation of the employment relationship. Employees engaging in work related dishonest acts will be subject to corrective discipline up to and including termination. All employees have a responsibility to protect BC Hydro assets and to report dishonest acts in a timely manner, should they become aware of them.

Where appropriate and in keeping with the Code of Conduct and the Employee Dishonest Acts Procedure, BC Hydro will seek full restitution of a dishonest act and assist the police in the preparation of materials for the prosecution if criminal and/or civil charges are pursued.

SOC Policy

Overview

The Standards of Conduct (SOC) Policy is directly related to the relationship between BC Hydro and BCTC and governs how non-public transmission information belonging to BCTC is to be treated. The SOC policy was approved by the BCUC on January 27, 2005.

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Many BC Hydro employees, in the normal and necessary course of their work to support BCTC, have access to detailed non-public information concerning BCTC's activities. This information, if made available to BC Hydro's marketing affiliates such as Powerex or to a third party transmission user, could give these people an unfair advantage. This information must be carefully restricted to avoid sanctions against BC Hydro, against Powerex and/or against the individual employees concerned.

To accommodate BCTC's need to control the flow of transmission information, BC Hydro needs to ensure that those employees receiving non-public information concerning BCTC's activities do not pass on that information to those involved in the wholesale power marketing business. BC Hydro has established a "no conduit" rule to ensure its required access to BCTC information is not abused.

For more information, see the SOC Policy on the SOC web pages of the BC Hydro website.

Your first point of contact for specific questions regarding the SOC policy is your manager. If you wish to report a suspected violation, or have questions regarding the SOC policy, call the confidential toll-free line: 1-866-364-9376.

Background

BCTC is a publicly owned entity separate from BC Hydro. BCTC was created as a result of the direction from the BC Government in the *Energy Plan* (defined under Policy Action #15). BC Hydro continues to own the transmission assets, which are managed by BCTC. BC Hydro provides services to BCTC in the areas of engineering, properties, government stakeholder engagement, aboriginal issues and maintenance of transmission assets. All power producers have equal access to the transmission system so that they can supply electricity not only to BC Hydro but also to large consumers (choice of suppliers).

The SOC Policy Applies to All BC Hydro Employees

The SOC applies to all employees, not just those providing services under the contracts between BC Hydro and BCTC. All BC Hydro employees are required to be aware of the SOC policy and their obligations under it. In addition, all Affected and Support Employees and employees involved in electricity marketing or transmission activities are required to take specific training on the SOC and their responsibilities. Completing the training certifies that the employee understands that they are not to reveal transmission-related information to anyone except as permitted by the SOC.

- Affected Employees - those who could perform work for BCTC
[shown in yellow boxes on the organization chart]
- Support Employees - those who support affected employees on work for BCTC
[shown in pale yellow boxes on the organization chart]
- Groups involved in electricity marketing or transmission activities:
 - [shown in dark and pale green boxes on the organization chart. Pale green for groups that have employees who are involved in electricity marketing and/or transmission transactions inside British Columbia, or which are co-located with groups involved in electricity marketing and/or transmission transactions. Dark green for groups that have employees who are involved in electricity marketing and/or transmission transactions outside of British Columbia.]

These groups are graphically shown on the BC Hydro Organization Chart and descriptions of their functions are contained in the Functional Report. See the SOC Policy web pages of the BC Hydro website for up-to-date copies of these documents.

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The SOC Policy does apply to contractors. Contractors are bound by the Confidentiality Agreement that they sign with BC Hydro to treat all information as confidential and not disclose such information without BC Hydro's written consent unless otherwise permitted in the Confidentiality Agreement. Likewise, employees of service providers such as ABSU are bound by the confidentiality clauses in the agreements between BC Hydro and the service provider. However, it is in the best interest of employees of service providers working in Affected and Support groups and groups involved in electricity marketing to complete the SOC training to ensure that they are fully aware of the confidentiality issues and their obligations.

Basic Message

The basic message of the SOC policy can be stated in 6 points.

- (1) BC Hydro has signed contracts with BCTC to keep non-public BCTC transmission information confidential. *[Ref: SOC Compliance Agreement, November 19, 2004]*
- (2) BCTC non-public information is to be shared only with those BC Hydro employees that require it to perform services under the BC Hydro-BCTC contracts. *[No-Conduit Rule] [Ref: SOC Policy, clause 3.2]*
- (3) If you don't know the BCTC information to be public, keep it confidential. *[Ref: Common Sense]*
- (4) In case of an emergency situation, you can communicate anything to anybody. Within 24 hours of the emergency, you must inform the Compliance Office of any non-public BCTC information disclosed and who received it. *[Ref: SOC Policy, clause 2(c)]*

An emergency situation is a condition or situation that:

- (a) in your judgment is imminently likely to endanger or damage life, property or the environment; or
 - (b) is imminently likely to cause a material adverse effect on the security of, or to cause damage to Plant or Interconnection Facilities.
- (5) If you believe another employee is improperly sharing BCTC information, you have an obligation to report.
- "A Director or employee will not be in compliance with the Code of Conduct if they performed activities, assisted others in activities, knew of and did not report activities by others, or authorized others to perform activities that materially contradict the terms and philosophy of the Code."
[Ref: BC Hydro Conduct Expectations Policy]
- (6) The Standards of Conduct apply to all BC Hydro employees.
[Ref: SOC Policy, clause 1(g) and 3.1]

Non-Public BCTC Information

The non-public nature of information might be momentary or it might be long-term. If BCTC information is not known to be public, it should be treated as non-public and kept confidential.

Types of Non-Public BCTC Information

There are 46 specific types of non-public BCTC information. However, these 46 types can be categorized under the following 7 headings:

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- Capacity and Interconnections – for example, anticipated transformer upgrades
- Design and Expansion Projects – for example, engineering designed projects either in development or underway
- Outages and Reinstatements – for example, planned or unplanned outages that impact system availability or capacity
- Schedules – for example, planned outages
- Transmission System Performance - for example, transformer derating
- Maintenance – for example, planned maintenance that might impact system availability or capacity
- Other (examples are: one-line diagrams with "planned" data, substation specifications, System Operating Orders, contingency plans)

The Transmission-Related Information Matrix details all 46 of these types of non-public BCTC information and the general groups of BC Hydro employees that are anticipated to receive such information. This matrix is available on the SOC Policy web pages of the BC Hydro website.

Generation Operating Information

BC Hydro can:

- Freely receive information from BCTC required to manage its Generating facilities
- Share this information within BC Hydro and Powerex.

Section 3.1 (d) of the SOC policy states that BC Hydro is allowed to receive generation dispatch information from BCTC for its facilities:

- (d) BC Hydro Employees and those of its Marketing Affiliates may have access to and use generation operating information necessary to perform generation dispatch and manage generating resources. This access does not include specific information about individual third party transmission transactions or potential transmission arrangements.

And is allowed to provide this information to anyone (business decision). This information would not be subject to the restrictions that would be applied to non-public BCTC information, but may be confidential BC Hydro information and should be treated accordingly.

BCTC Facilities Information

Section 3.1 (a) & (b) of the SOC policy states that there is a prohibition on BC Hydro receiving non-public BCTC facilities Transmission Information:

- (a) BC Hydro will ensure that its Employees and those of its Marketing Affiliates will not have access to any non-public Transmission-Related Information.

The exception to this case is during an emergency situation affecting system reliability where Generation Resource Management may receive information from BCTC to resolve a real-time problem. When such communications occur, the Compliance Office must be notified immediately. Details of such communications will be posted on our Internet website within 24 hours.

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The same notification procedure must be followed should any non-public transmission information be inadvertently disclosed to employees within BC Hydro or its marketing affiliates.

- (b) Affected Employees may only have access to and use non-public Transmission-Related Information to perform a role or responsibility BC Hydro has assumed under the Key Agreements.

For example, Properties staff having access to non-public information concerning BCTC facilities can share that information with specific engineering groups only if the information is required by those groups to perform work for BCTC under a Service Level Agreement (SLA).

BCTC operating impacts on the Generating Station can be freely discussed under SOC 3.1(d). However, if the operator knows the specific BCTC equipment (facilities) that are causing the operating impact, that information cannot be shared unless it has been made public by BCTC (posting on OASIS/Internet).

No-Conduit Rule

The “no-conduit” rule means that except where otherwise permitted by the SOC, employees in receipt of non-public BCTC information as part of their job must not share that information with employees in groups involved in electricity marketing or transmission activities such as Powerex, or Generation Resource Management. Non-public BCTC information may only be shared with employees who require such information to perform services under the contracts between BC Hydro and BCTC or with BCTC itself.

The transfer of employees from Affected/Support groups to electricity marketing groups must not be used as a means to circumvent the no-conduit rule. Employees transferring from Affected or Support groups to groups involved in electricity marketing must not use or share the knowledge of non-public BCTC information they acquired in their previous position in their new position. BC Hydro, through the Compliance Office, is required to maintain and publish a log of such transfers on the external SOC website within 7 days of any transfers of employees from Affected or Support groups to groups involved in electricity marketing.

Related Policies

In addition to the Code of Conduct, there are a number of BC Hydro policies and procedures that directly apply to the SOC policy. The most significant of which is the Handling of Confidential Information Corporate Procedure and the Freedom of Information and Protection of Privacy Corporate Procedure.

Handling of Confidential Information

The Handling of Confidential Information Corporate Procedure states that confidential information should only be used for the purpose for which it was intended. Employees will safeguard confidential information from unauthorized access by parties both outside and inside BC Hydro.

Confidential information should be exchanged within BC Hydro and its subsidiaries on a need-to-know basis only. Employees should not automatically treat the absence of a ‘confidential’ label as proof that information is not confidential. Employees should think carefully how they handle all information – labelled and unlabelled.

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If you have received information from BCTC and you are unsure if the information is non-public (confidential) or not, you must assume that it is non-public and only share that information with those who require it to perform services under the contracts between BC Hydro and BCTC.

Third party information, such as information on an Independent Power Producer (IPP), must not be shared with anyone without that third party's permission.

Non-public BCTC transmission information is not to be disseminated in briefing notes to the Government and/or to Regulatory bodies such as the BCUC. This would violate the SOC. If the Government or a Regulatory body were to request information from BC Hydro, the correct action would be to refer these groups to BCTC for a response.

Non-public BCTC transmission information required for submissions under the normal course of business, such as information required to conform to environmental laws or to obtain environmental approvals, can be provided to the appropriate agency without violating the SOC policy.

If you have received non-public BCTC information that you think or know you should not have, you must:

- return it to the sender indicating that the information was sent to you in error,
- destroy all copies of the information,
- not use the information, and
- notify the Compliance Office.

The Compliance Office is required to report any non-public BCTC information that has been shared improperly.

You should familiarize yourself with the Handling of Confidential Information and the Freedom of Information and Protection of Privacy Corporate Procedures.

Reporting Suspected Violations

If you suspect that the SOC have been violated, you are obligated to report it to the Compliance Office. The Compliance Office will investigate and, if it determines that a violation has occurred, it reports the violation via BC Hydro's external website. BC Hydro, through the Compliance Office, is required to maintain and publish any confirmed violation and the resulting actions on the external SOC website within 24 hours of the confirmation by the Compliance Office.

- You can report a suspected violation through: 1-866-364-9376 which has a confidential voice mailbox; or
- By contacting the Compliance Advisor.

If you are a manager or supervisor and an employee reports a suspected violation of the SOC to you, you must refer the matter immediately to the Compliance Office for investigation.

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Examples

Introduction

The scenarios provided are not based upon real people or actual events. However, they do represent realistic circumstances that could occur during the course of day-to-day business dealings. The discussion that follows each scenario will assist you in understanding what constitutes non-public BCTC information. Please remember that this discussion is general in nature and may not be appropriate in actual circumstances or if any of the facts are different.

Please note the questions in this section permit you to test your understanding of what constitutes non-public BCTC information as it relates to the SOC policy.

Example 1 - Outages and Reinstatements Scenario

"I'm a Field Operations employee and noticed a problem with a piece of transmission equipment that will require the equipment to be taken out of service. I know from experience that the transmission equipment will be out of service for at least two weeks, and will result in the specific line being operated at a reduced capacity. Can I talk freely about this with anyone?"

Yes No

Answer

No, you cannot speak freely about this with anyone. This is an example of non-public transmission information.

- The information of which piece of equipment and which circuit is affected is non-public transmission information and is not to be shared with anyone other than people who need to know to perform work for BCTC.
- Information regarding system availability is posted on the BCTC external website that is accessible by generation and power trading companies. The information concerning this outage may or may not be posted and posting might occur within an hour or within days – this is unknown. If you are not aware of such a posting, the information concerning this outage should be considered non-public information.

Example 2 - Project Reports

"I'm a Project Manager in an engineering group. I have projects for both BC Hydro and for BCTC. Every month, I provide a full status report to all of my clients listing the status of these projects. Can I continue to provide the report to my clients?"

Yes No

Answer

No. This is an example of non-public transmission information.

- The information on the BCTC projects is non-public transmission information and is not to be shared with anyone other than people who need to know to perform work for BCTC.
- Your BC Hydro clients do not need to know details of the BCTC projects. Therefore, you will need to create two separate reports: one for BCTC clients, and another for BC Hydro clients. Similarly, your BCTC clients do not need to know the details of the BC Hydro projects.

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Example 3 - Design and Expansion Projects Scenario

"I'm an MMBU employee. I'm preparing a load of equipment to ship to a specific location for a BCTC project to repair part of the transmission system. Can I tell anyone about the type of equipment being shipped or where the equipment is going?"

Yes No

Answer

No. This is also an example of non-public transmission information.

- The type of equipment loaded on the truck would indicate to a knowledgeable employee the type of repair being undertaken and therefore the length of time a circuit would be out of service and therefore capacity reduced.
- The information of where the equipment is being delivered and/or the related project is non-public transmission information and is not to be shared with anyone other than people who need to know in order to perform work for BCTC.

Example 4 - Engineer in Training Scenario

"I'm an Engineer in Training and as part of my training program, I provide a monthly report on the projects I have been working on. One of the projects is for future maintenance on the transformers on the 2L38 line, which will result in this line being taken out of service from May to June. Can I provide details about the project?"

Yes No

Answer

No. This is also an example of non-public transmission information.

- Your report can include information on the project such as the future benefit. However, it must not include details as to which piece of equipment or which circuit is affected. These details are non-public transmission information and are not to be shared with anyone other than people who need to know to perform work for BCTC.
- Information regarding system availability is posted on the BCTC external website that is accessible by generation and power trading companies. The information concerning this future outage may or may not be posted - this is unknown. If you are not aware of such a posting, the information concerning this outage should be considered non-public information.

Example 5 - BCTC Projects Scenario Part 1

"I'm a Field Operations employee and am working on a BCTC project. Can I talk about it with other BC Hydro workers at a local restaurant after work?"

Yes No

Answer

No. Specific detailed information that identifies the BCTC project is non-public transmission information.

- All specific information that identifies the BCTC project is non-public transmission information and is not to be shared with anyone other than people who need to know to perform work for BCTC. Details such as the specific location or piece of equipment that would identify the BCTC circuit or facility that would be capacity restricted are key confidential items.

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- In addition, you should not discuss the project details in a non-work setting with others working on that same project. Even though the parties participating in this discussion might be involved in the project, others overhearing the discussion (and unknown to the group involved in the discussion) may obtain an unfair market advantage with knowledge of the information being discussed.
- This example would be the same if it occurred at work. Information concerning BCTC is shared on a need to know basis.

Example 6 - BCTC Projects Scenario Part 2

"As a follow-up question, can we talk at work about the specific type of problem we were working on and the actions we took to solve the problem?"

Yes No

Answer

Yes. You can freely discuss the type of problem and actions to solve it as long as the discussion does not identify BCTC or a transmission circuit such that the timing of a reduction in capacity would be identified. However, the points listed in the response to the first part of the question above still apply.

- The concern is to not discuss information that could be used to obtain an unfair market advantage.
- Details such as the specific location or piece of equipment that would identify the BCTC circuit or facility that would be capacity restricted are key confidential items.
- This example would be the same if it occurred at work. Information concerning BCTC is shared on a need to know basis.

Example 7 – Errant Email Scenario

"I've just received an email meant for someone else containing information about maintenance work being done on a transmission line. I've let the person who sent it know that I received it in error. However, my co-worker is working on a project that I think having this information would be of use to her. Can I share this information with her?"

Yes No

Answer

No. The information you have received may or may not be public. Since you do not know if the information is public or not, you must assume that it is non-public and keep it confidential. You must not share it with anyone who does not require the information to perform services under the agreements between BC Hydro and BCTC. If your co-worker requires the information and is entitled to have access to it, she will have the information through her normal channels.

Letting the person who sent it know that you received it in error is correct, but only the first step. You must destroy all copies of the information (hard copy and soft copy), not use the information in any way, and must inform the Compliance Office that you've received this information.

Example 8 – Suspected Violation Scenario

"I've just overheard two co-workers discussing how they are going to take some of the copper wire that we have stored on site to the scrap metal dealer to make some extra money. Should I report this to the Compliance Office?"

Yes No

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Answer

No. This is not a matter for the Compliance Office.

While your suspicions may be correct that these coworkers are violating policy, it is not a violation of the SOC; it is a violation of the Code of Conduct and must be reported immediately to the Code of Conduct Advisor as well as the Regional Security Services and Labour Relations.

The theft of BC Hydro property does not involve non-public BCTC information and therefore does not involve the Compliance Office. However, it is a serious violation of the Code of Conduct and will be investigated. If these two workers were to have instead discussed providing non-public BCTC information to a third party, then it would be a violation of the SOC and must be reported to the Compliance Office.

Example 9 - Environmental Information Scenario

“As part of the repair work on a transmission line, can I still provide the usual data to the local Environmental Assessment Office?”

Yes No

Answer

Yes. Under the contracts between BC Hydro and BCTC, we continue to operate following all applicable environmental legislation. As the service provider performing the field work, BC Hydro will advise the environmental agencies as required.

Example 10 - Proposed New Transmission Line Scenario

“I’m a Properties employee. I’m investigating Right of Way access for a new transmission line that BCTC has proposed but, as yet, the details of this new line haven’t been announced publicly either through the Regulatory process or through the media. I’m working on this with BC Hydro employees in an engineering group, Environment & Sustainability, Aboriginal Relations & Negotiations, and Legal Services. Who can I talk to about this project?”

Anyone Any other BC Hydro employee
 Anyone in my department Only those who are directly involved in the project

Answer

Only those who are directly involved in the project (including those in other BC Hydro groups).

- The information regarding the new transmission line is non-public BCTC information, therefore falls under the terms of the SOC policy.
- You should not share information about this project with others, even those within your department, unless they are directly involved.
- Details such as the capacity, route or planned in service date could give an outsider or anyone involved in BC Hydro's electricity marketing or transmission activities such as Powerex or Generation Resource Management an unfair advantage.

Example 11 - IPP Interconnection Scenario

“As part of the IPP Interconnection process, can I discuss other potential (non-public) IPP projects?”

Yes No

Answer

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No. Non-public information regarding an IPP is confidential and is only to be used as required within BC Hydro. Refer to the Corporate Policy on the Handling of Confidential Information.

Example 12 - Transmission Line Capacity Constraint Scenario

"I work in Generation Resource Management. I've just found out from BCTC that there is a capacity constraint on a line that will affect the available transmitted power from one of our facilities. I know that I will need to inform a number of other people of this constraint. Can I share this information with others within BC Hydro who require it to do their job?"

Yes No

Answer

Yes. You can discuss the information provided by BCTC regarding transmission line capacity constraints affecting a specific generating facility with anyone at BC Hydro who requires this information to do their job. BCTC will provide facts of the constraint (i.e. time, capacity) but not the reason for the constraint (unless public information).

- Information from BCTC on specific BC Hydro Generation facility constraints is information required for BC Hydro to manage its generating resources and is covered under Section 3.1 (d) of the SOC Policy.
- The information about generation facility constraints is not BCTC information per se, but is confidential BC Hydro information, and is to be treated as such.

Example 13 - Job Transfer Scenario

"I work in Transmission Engineering which is an "Affected" group under the SOC definitions. I've just been offered a position within Powerex, which is one of the groups involved in electricity marketing or transmission activities under the SOC definitions. Under the SOC policy, can I accept this position?"

Yes No

Answer

Yes. The SOC policy does not prohibit employees from transferring between Affected or Support groups and groups involved in electricity marketing or transmission activities. However, you are required to keep any non-public BCTC information that you acquired in your Engineering position confidential and not share it in your new Powerex position.

In addition, there is a reporting requirement.

- The Compliance Office must be informed prior to an employee transferring from a "Yellow" group to "Green" group. BC Hydro, through the Compliance Office, is required to maintain and publish a log of such transfers on the external SOC website within 7 days of the transfer.
- The transfer of employees from "Yellow" groups to "Green" groups must not be used as a means to circumvent the non-conduit prohibition in the SOC policy. The different groups at BC Hydro are displayed on the Organizational Chart available on the SOC policy website.

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For Further Information

SOC Contacts

Your first point of contact for specific questions about the SOC, or any of BC Hydro's corporate policies and procedures, is your Manager. If you are uncomfortable with approaching your Manager, or if you would like to obtain confidential advice, you are encouraged to contact the Compliance Office at any time. You do not need your Manager's permission to contact the Compliance Office nor may your Manager prohibit you from contacting the Compliance Office.

The Compliance Advisor is the main contact in the Compliance Office for questions about the SOC, including SOC Policy and Procedures, and violations

Contact	Details
Compliance Advisor	Heather Reis 604 623-3726 Heather.Reis@bchydro.com
Chief Regulatory Officer (responsible for Compliance Office)	Joanna Sofield Chief Regulatory Officer 604-623-4422 Joanna.sofield@bchydro.com
Chief Compliance Officer	Charles Reid Chief Compliance Officer 604 623-4400 charles.reid@bchydro.com
24-hour Confidential Voice Mailbox	If you wish to report a violation, or have questions regarding the Standards of Conduct, call the toll-free line: 1-866-364-9376.

Confirmation

You have now completed the training on the Standards of Conduct policy. The SOC Compliance Program requires that BC Hydro track which employees have completed this training. Please complete the attached Confirmation page and send it to the Compliance Office to update your training record.

Standards of Conduct Training Confirmation

*The Standards of Conduct Compliance Program requires that BC Hydro track which employees have completed training. If you have **not** accessed the training through the iLearn System, please print and complete this page and send it to the Compliance Office to update your training record.*

I have completed the training on the Standards of Conduct with respect to non-public transmission-related information of the British Columbia Transmission Corporation.

Name (please print): _____

Date Training Completed: _____

Signature: _____

Position: _____

Employee Number: _____

Line of Business: _____

Division: _____ Cost Centre: _____

Please complete and return to:

Compliance Office
British Columbia Hydro and Power Authority
16th Floor, 333 Dunsmuir Street, Vancouver, B.C. V6B 5R3
Telephone: (604) 623-3726 (internal #73726 – OCS address DUNS-16)
FAX: (604) 623-4407 (7-4407)

If you are in Engineering, forward a copy of this confirmation to
Sandi Leland - Edmonds A03

For OCCO Use Only:

Received by the Compliance Office on _____

Entered into iLearn