EXHIBIT 5
Management Antifraud Programs and Controls

Objective	Guidance
Creating a culture of honesty and high ethics	• Set the tone at the top for ethical behavior • Create a positive workplace environment • Hire and promote appropriate employees • Provide training about the entity's values and its code of conduct • Obtain periodic confirmation by employees of their responsibilities • Discipline violators
Evaluating antifraud processes and controls	• Identify and measure fraud risks • Mitigate fraud risks • Implement and monitor appropriate internal controls
Developing an appropriate oversight process	• Involve audit committee or board of directors • Involve management • Involve internal auditors • Have an open and candid dialogue with the independent auditors

Source: *SAS 99, adapted from the exhibit "Management Antifraud Programs and Controls: Guidance to Help Prevent and Deter Fraud"*