

September 27, 2006

To: Dabney Ware
From: Harold Goldstein

Re: Armstrong v. Ford and Visteon

Revised Proposal for Mid-Point Review

Objective

This proposal focuses on presenting a plan for conducting a Mid-point review on how the new human resource initiatives have impacted Visteon Corporation. The initiatives instituted by Visteon Corporation focused on the goal of promoting and fostering equal opportunity in compensation, promotion, evaluations, and career advancement for all employees in all levels and areas of the business, regardless of race, color, gender, religion, age, national origin or disability, and to promote and foster an environment of inclusion, respect, and freedom from retaliation. The purpose of the Mid-point review is to gauge progress with regard to this goal.

Target Outcomes

This project focuses on determining the progress that Visteon Corporation has made in instituting human resource-based initiatives that promote and foster equal opportunity and advance diversity goals. According to the agreement, the human resource-based initiatives that require evaluation are focused on the following areas:

- Internal staffing practices, including promotions
- Reporting and monitoring of compliance
- Performance reviews
- Compensation
- Hiring and recruiting
- Terminations

Two individuals have been assigned the role of evaluating this progress – the Labor Economist and the Industrial/Organizational Psychologist. This proposal focuses solely on how the Industrial/Organizational Psychologist could gauge the progress of Visteon Corporation in meeting their goals.

Description

This proposal involves the following activities:

- Interview personnel in charge of implementing new HR-based initiatives (or persons who have knowledge of the practices implemented) in order to gain an understanding of the interventions put into place at Visteon.

- ❑ Review the compliance reports to gain an understanding of what was measured by the organization regarding the initiatives and evaluate progress made as indicated in the reports.
- ❑ Conduct focus groups and individual interviews with various Subject Matter Experts (i.e., HR manager and personnel, senior management group, mid-level managers, and representative employees) to collect information on (1) the new HR-related initiatives and (2) perceptions of the extent to which the organizational culture supports diversity and creates an atmosphere of inclusiveness.
- ❑ Perform job assessments and review relevant documents and data that pertain to the HR-based initiatives in order to evaluate progress toward the stated goals (e.g., examine information regarding job postings to determine the clarity of the job descriptions; track the demographics of the staffing interview panels to ensure a diverse group was used; inspect the performance appraisals to check if they meet the standards of the field in terms of fairness and accuracy).
- ❑ Draft a final summary report on findings from these activities. The final report will be submitted to Visteon Human Resources, Glass Division, Human Resources Manager, the General Counsel's office and to counsel for the parties.

These activities should provide clear information regarding the progress of Visteon Corporation. However, if the proposed activities do not yield the data required (e.g., relevant documents do not exist or key personnel do not possess the information needed), other approaches could be used (e.g., an employee survey on attitudes and experiences with regard to the HR initiatives).

Estimated Time to Conduct Project*

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| ❑ Initial interviews | 1-2 days |
| ❑ Review of compliance reports | 1 day |
| ❑ Preparation for and conducting of focus groups, interviews, and job assessments | 4-5 days |
| ❑ Review of relevant documents and data | 3-4 days |
| ❑ Analysis of data and extraction of key findings | 2-3 days |
| ❑ Draft of final summary report | 1-2 days |

*All costs are estimated based on the agreed upon hourly rate of \$250 per hour (i.e., \$2000 per 8 hour day). All the figures above are estimates of how long it will take to complete each stage. The actual time required to complete this work may be more or less than this estimated. The estimates above do not include additional request for time that the company or members of the case may request (e.g., depositions, providing an oral report to the company). Also, the costs above do not include conducting a more formal survey of employees to capture data, which is an option that could be done for this project. All additional costs incurred such as travel, lodging, printing, and postage will be billed at cost.

7/30/06