

## Code of Conduct Assessment Checklist

Use the following questions to help assess the effectiveness of your Code of Conduct (Code)

### Is Your Code Up-To-Date?

- Addresses ever-changing organizational, risk and compliance issues (e.g., social media, cybersecurity, privacy, sanctions)
- Aligns with corporate culture
- Updates are scheduled and done regularly

### Is Your Code Easy to Understand?

- Clearly lays out high-level principles and its everyday expectations
- Sets the tone for an ethical workplace
- Easy to search and navigate
- Uses user-friendly tone (“We”)

### Is Your Code Engaging?

- Is an interactive document
- Uses measures such as call-outs, scenarios, and FAQs to aid in understanding
- Has eye-catching format
- Contains links to relevant documents and resources

### Is your Code experiencing any of the indicators that may reveal it is not working?

- Key risk areas/topics are missing or outdated
- Too wordy
- Overly legalistic
- Not well-organized
- Visually not compelling
- Documented instances of awareness issues involving its content, existence, or location
- Inconsistencies with policies
- Audit issues and findings
- Complaints via customers and hotline
- Pattern of questions seeking clarity on topics/guidance

### Is your Code development/maintenance process factoring the considerations noted below?

- What do we stand for?
- What is most important to us?
- What values do we want to promote?
- What is required by our industry regulators?
- How do we want to be perceived?
- Who are the stakeholders and what is important to them?
  - Customers
  - Employees
  - Suppliers / Third-Parties
  - Business Partners
  - Communities we operate in
  - Shareholders
  - Investors

