



ELEMENTS OF AN EFFECTIVE ETHICS PROGRAM

CODE OF CONDUCT

WHAT IS A CODE OF CONDUCT?

A code of conduct is the foundation of an effective ethics program. A code summarizes a company's expectations for employees and others who act on its behalf. It should be simple and concise.

WHY CREATE A CODE OF CONDUCT?

- ✓ Comply with regulations, such as FAR Clause 52.203-13
- ✓ Establish the framework for your ethics program
- ✓ Communicate how you do business to internal and external stakeholders

OTHER RESOURCES

DII Model Supplier Code and Small Business Toolkit:

www.dii.org/featured-tools

Lockheed Martin Supplier Code:

www.lockheedmartin.com/content/dam/lockheed-martin/eo/documents/ethics/supplier-code.pdf

Ethics & Compliance Initiative (ECI):

ethics.org/resources/free-toolkit



START WITH A TEMPLATE

Download the DII Model Supplier Code, the Lockheed Martin Supplier Code, or ask one or more of your key customers to use their code of conduct as your guide.



CUSTOMIZE TEMPLATE

Edit the template so your code of conduct addresses all of your company's ethics and compliance risks. Adjust the format to fit your internal style and set a schedule for updates.



DISTRIBUTE INTERNALLY

Give a hard copy of your code to every employee, require all new hires to certify they read it, and upload it to your internal and/or external website(s) for easy access.



FLOW TO SUPPLIERS

Include your code of conduct or supplier code in contracts with suppliers and other business partners. Also flow down the substance of FAR Clause 52.203-13 if required.