

Transparency Criteria: Codes of Conduct



Here is the set of 29 criteria that companies can use to make their codes of conduct more transparent:

1. A search for “code of ethics or code of conduct company name” in any search engine will lead to the most recent document in the top three results.
2. The most recent version is found in the Ethics or Corporate Governance section of the corporate website.
3. The document is available in print PDF format.
4. The document is available in an interactive format, sending the reader to additional content such as a video or intranet for more information.
5. If the document is translated, the translated documents are available on the same landing page as the English version on the corporate website.
6. A list of the different code(s) or policy(ies) are available on the same landing page as the primary code.
7. Document name is either Code of Ethics or Code of (Business) Conduct.
8. The document is dated and produced or updated within the last two years.



9. The document includes a one-page table of contents with two levels of hierarchy.
10. The document includes an introductory letter from the CEO and/or the CCO.
11. The letter mentions (i) the importance of ethics, compliance and integrity, (ii) following the code, and (iii) reporting a concern.
12. The document includes a section about the purpose of the code and who it applies to.
13. The document explains the process for requesting waivers.
14. The company values are presented at the beginning of the document.
15. The Code addresses anti-corruption and ethical business practices.
16. The Code summarizes its anti-harassment policy.
17. The Code covers employee behavior expectations, including at a minimum, anti-discrimination, conflicts of interest, financial reporting, insider trading and use of company assets.
18. The Code addresses confidentiality and information security.
19. The document includes a chapter/paragraph on code violations.
20. The section on reporting violations includes at least three ways (such as hotline, in-person or email) to report a concern, and includes the ability to report anonymously.
21. The document says the company has a policy that prohibits retaliation against people who report concerns.
22. The company presents the governance structure of the ethics and compliance program.



23. The document refers to other related policy(ies).
24. The document includes direct link(s) to other related policy(ies).
25. The document uses personal pronouns (we, you) rather than titles (the Company, every employee).
26. There are at least three graphics or infographics within the document.
27. The document includes at least three practical case studies/examples (Q&A).
28. The document includes a decision-making tree graphic.
29. The document includes a graphic depicting the reporting procedure.

