Code of Conduct Benchmarking Framework

ACCESSIBILITY

CRITERIA	BASELINE QUESTIONS	BEST PRACTICES
Age of Code	When was Code last refreshed or rewritten? Has the company acquired new business lines, expanded geographical footprint, changed business models, or engaged with new third parties since previous refreshment? When were companion training modules last refreshed?	Review every year and refresh at least every 2-3 years—more often if company acquires new business lines, changes business models, or expands into new markets. Companion training should be refreshed when Code is refreshed or when roles/business processes change.
Length	What is the total word count of the Code?	Average length 8,000 words total. This does not apply to linked policies, just Code itself.
Readability	Does Code of Conduct incorporate legalese or is it concise and conversational? What is the grade level of written text? Is content text heavy or is it visually appealing?	Code language should be simple, direct and strong, written to an 8th grade reading level. Make use of section breaks, headers, lists, tables, graphics, and white space. Flesch-Kincaid score is a common metric to gauge readability. Visit www.plainlanguage.gov for guidance on writing for optimizing readability.
User Friendliness	Is Code centrally located on the company intranet where employees can easily find it? Is Code content searchable so employees can find specific topics when they need refreshment, clarification, or guidance on a certain topic or issue? Can Code be saved offline?	Design Code to be used as a reference document employees can find easily and refer to when they have a question about company rules or ethics and compliance policies and procedures. Digital and/or PDF versions of Code should be searchable and include an interactive table of contents.
Dissemination	Is Code shared with all employees, including when appropriate third-party employees? How and where is it disseminated?	Publish Code on a centralized location on company website or "intranet" environment. PDF versions should be downloadable for future reference.
Responsive Design	Can Code of Conduct (and companion training) be accessed and read on personal devices such as tablets and smart phones, or only on pcs and laptops? Is the user experience consistent across all types of devices?	Ensure Code of Conduct materials are accessible in a variety of digital environments. Code microsites should embed responsive design capabilities to facilitate consistent usability, navigation, and information access across devices.
Globalization	Is Code of Conduct available in language used by the target audiences (including languages used by third-party employees)?	All target audiences should have access to Code in the native languages of the countries in which they work.

AUTHENTICITY

CRITERIA	BASELINE QUESTIONS	BEST PRACTICES
Tone at the Top	Does the Code include a written or video message from CEO in the introduction? If so, how long is the message? When was it last updated? Is it generic or authentic?	Code should be introduced by the CEO. The CEO message should be brief, authentic and explain why and how ethics and compliance are important to company's success.
Values Alignment	Do policies and procedures within Code align to corporate culture? Does Code help employees "walk the talk" of the company's public-facing values and ethics statements? Is Code published on a public-facing website?	There should be strong interconnection between Code and corporate culture. Procedures and policies should represent day-to-day working life of the company. Code should link ethics and values to standards of conduct employees can buy into.
Branding	Is Code a generic document or is it a media-rich PDF with similar graphic design/voice/tone as company's other public facing publications?	Code of Conduct should visually connect with corporate branding, having similar appearance and voice as other public-facing company documents such as the Annual Report, Sustainability/ESG report, and corporate website.
Relevancy	Is the Code (and companion training) generic or has it been customized to fit company's industry as well as the roles, job flows, and experiences of employees' day-to-day jobs?	Policies and procedures of Code should be integrated into the company's day-to-day work activities. Code and companion training should be linked to company values and based on relatable, relevant examples and scenarios.

PROOF OF EFFECTIVENESS

CRITERIA	BASELINE QUESTIONS	BEST PRACTICES
Attestations	Is Code attestation concise? Does it reinforce personal ownership, expectations for speaking up, and/or employee reporting options and commitment to nonretaliation?	Code attestations should be brief and to the point while reinforcing key program messages.
Waivers	What is the Code waiver approval process?	Waivers should be approved by CCO or higher.
Analytics	What metrics track engagement with, and effectiveness of, Code? Does companion training embed analytics? What data is tracked? Do employees have means to ask questions that arise from training? Does company test awareness and comfort with reporting hotlines?	Code should be interactive and track access to policies and procedures to understand which topics are attracting attention from employees. Companion training analytics should measure effectiveness of training modules in addition to completion rates.

CRITERIA	TOPIC INCLUDED IN CODE? Y/N	DATE OF LAST REFRESH	LINKS TO SUPPORTING POLICIES? Y/N	LEARNING AIDS IN PLACE? Y/N	RELEVANT INFO & SCENARIOS? Y/N	EXTEND TO THIRD PARTIES? Y/N
ETHICAL DECISION SUPPORT						
Speaking Up/Non-Retaliation						
Complaint/Investigation Process						
Hotline Contact						
RISK MITIGATION						
Alcohol and Drug Free Workplace						
Anti-Bribery/Anti-Corruption						
Community Involvement						
Competition/Anti-Trust						
Confidential Information						
Conflicts of Interest						
Cooperating with Investigators/Auditors						
Cybersecurity/Use of Technology						
Data Privacy/Data Protection						
Diversity & Inclusion						
Employee Handbook						
Environmental Protection						
Expectations of Suppliers/ Supplier Due Diligence						
Gifts & Entertainment						
Government Interactions						
Health & Safety						
Human Rights: Slavery, Child Labor						
Information Security						
Insider Trading						
Intellectual Property						
Money Laundering						
Political Contributions & Activities						
Quality Control						
Records Management						

Respect & Equal Opportunity, Discrimination & Harassment					
Responsible Sales & Marketing (Fair Dealing)					
Social Media					
Speaking to the Public/Media					
T&E Expenses, Corporate Credit Cards					
Trade Sanctions Import-Export Controls Anti-Boycott					
Third-Party Compliance					
Use of Company Resources Protection of Assets					
Work from Home Policies & Protocols					
Workplace Violence					
OTHER					
OTHER					
OTHER					
OTHER					
OTHER					