

REFERENCE GUIDE

Annual Code of Conduct Acknowledgment Language

What does your code of conduct acknowledgement process look like? If your annual attestation language is long, confusing or overly complicated, you run the risk of alienating your employees—and missing an opportunity to position your program.

Below is sample language we recommend for code of conduct attestations. It's short, sweet and to the point, while reinforcing key program messages. From there, depending on your organization's ethics and compliance risk profile, we've also provided add-on text to choose from that emphasize different aspects of a strong E&C program.

Feel free to use this language in your organization or customize it to fit your needs.

Sample: Core / Basic Code of Conduct Attestation Language

As stated in our code of conduct, adherence to the law and the highest ethical standards of integrity is the foundation of everything we do. Meeting this standard and complying with all applicable laws and regulations does not just happen; it requires a commitment from each of us.

I acknowledge that I have read and understand our code of conduct and I agree to abide by its provisions.

ADD-ON OPTION 1: Reinforcing Personal Ownership

- I have read and understand the provisions of the ACME Corporation code of conduct.
- I will abide by the standards of conduct contained in the code and in company policies.
- I will complete all required training courses on ethics and compliance topics including training on the code.
- I will speak up, using the resources listed in the code, if I am in doubt as to the proper course of conduct or if I become aware of possible violations of our standards or the law.

ADD-ON OPTION 2: Reinforcing Expectations for Contributing to Your Speak-Up Culture

- If I become aware of any situation involving a conflict or a perceived conflict of interest as described in the code or the company's conflicts of interest policy, I will report my concerns using one of the resources listed in the code.
- I will cooperate in internal and external audits and investigations by fully and truthfully providing information and by preserving all materials that might be relevant.
- I understand that a violation of the law, our code or company policies may result in disciplinary action in accordance with local laws and internal procedure.

ADD-ON OPTION 3: Reinforcing Employee Reporting Options & No-Retaliation Commitment

To speak up, seek guidance or report a possible violation of the law, our code or company policy, please reach out to any of the following resources:

- Speak to your manager
- Contact Legal, Compliance or HR
- Call the ACME Corporation Ethics & Compliance Helpline or visit our web reporting portal www.compliance.acmecorp.com

Our organization will not tolerate retaliation against anyone who raises concerns about a violation of the law, our code or company policy in good faith.



ABOUT NAVEX GLOBAL

NAVEX Global's comprehensive suite of ethics and compliance software, content and services helps organizations protect their people, reputation and bottom line. Trusted by 95 of the FORTUNE 100 and more than 12,500 clients, our solutions are informed by the largest ethics and compliance community in the world.