Code of Ethics

A Custom Portfolio of NAVEXEngage Ethics & Compliance Training Courses
AVAILABLE ONLINE AT
https://www.navexglobal.com/products/online-ethics-compliance-training/learning-courses/custom-training-plan/8ba17902
<table>
<thead>
<tr>
<th>CONTENTS</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>INTRODUCTION</td>
<td>2</td>
</tr>
<tr>
<td>Anti-Bribery &amp; Corruption (Basics)</td>
<td>5</td>
</tr>
<tr>
<td>Bribery &amp; Corruption: Prevention Is Everyone’s Responsibility</td>
<td>8</td>
</tr>
<tr>
<td>Code of Conduct: Why Our Values Matter</td>
<td>9</td>
</tr>
<tr>
<td>Confidential Information and Intellectual Property</td>
<td>10</td>
</tr>
<tr>
<td>Conflicts of Interest</td>
<td>12</td>
</tr>
<tr>
<td>Conflicts of Interest: Identifying and Handling a Conflict</td>
<td>14</td>
</tr>
<tr>
<td>Data Privacy: Managing Fourth-Party Risk</td>
<td>15</td>
</tr>
<tr>
<td>Ethical Leadership: Managing with Integrity</td>
<td>16</td>
</tr>
<tr>
<td>Ethics and Code of Conduct</td>
<td>18</td>
</tr>
<tr>
<td>Financial Integrity: Working with Honesty and Transparency</td>
<td>21</td>
</tr>
<tr>
<td>Global Data Privacy</td>
<td>23</td>
</tr>
<tr>
<td>Social Media: Sharing Responsibly</td>
<td>25</td>
</tr>
<tr>
<td>Workplace Harassment: It’s About Respect</td>
<td>26</td>
</tr>
</tbody>
</table>
An effective and engaging ethics and compliance training program is a critical component in building and maintaining a culture of ethics, integrity and respect. Training that is relevant and stimulating creates a strong organizational culture while ensuring individual alignment to applicable regulatory and behavioral expectations.

Our approach to employee education is built upon decades of experience in the compliance eLearning space and reflects our commitment to effective training with exceptional return on investment. We pride ourselves on the quality of our training solution and its ability to resonate with learners and meet the unique training needs of your organization.

The 2018 NAVEX Global Training Benchmark Report showed more survey respondents see ethics and compliance training programs as the key element in preventing misconduct and ethical violations more than any other element of an ethics and compliance program. Training and awareness are also seen as essential vehicles through which behavioral and cultural expectations are expressed, addressed and enacted in an organization.

NAVEX Global’s eLearning solution, NAVEXEngage, delivers market-leading ethics and compliance training with highly interactive and regularly refreshed content designed to engage learners and drive understanding and behavioral changes. Our risk-based approach ensures you can deliver training on critical topics to key audiences with both short-form micro learning and full-length courseware, on any device, virtually anywhere and anytime. Your learners expect focused, engaging and topical training that informs yet does not overburden.

NAVEXEngage courseware empowers you to address your most critical ethics and compliance risks. From harassment to cyber security and your code of conduct, we focus on the topics that matter to you. Our courseware is updated on a regular cadence to ensure that customers are training employees on current obligations and risks. For example, our Workplace Harassment course has been updated every 24 months for more than 15 years, enabling many customers to plan their harassment training around our update schedule.

Your Custom Catalog

This catalog, created to address your unique ethics and compliance concerns, is designed to optimize your training program. Whether you select full-length or micro learning content, our training approach is purposely flexible to allow you to train on multiple topics for multiple learners over several years via a custom training plan. Use this catalog, your training calendar and the various course lengths we offer to elevate your training program and ensure your objectives are met.

Talk with us about how to construct the most effective approach to ethics and compliance training, build an optimized calendar and curriculum, and to pursue a risk-based and multi-topic training program for your learners. https://www.navexglobal.com, info@navexglobal.com, 866 297 0224 / +44 (0) 20 8939 1650.

Training Within Your Ethics & Compliance Program

NAVEX Global offers a platform of ethics and compliance solutions, including incident management, policy and procedure management, ethics and compliance training,
third-party risk management and code of conduct services. These program elements are interlinked through their ability to not only capture ethics and compliance trends, but also to empower organizations to take proactive action to drive change.

Our training solution is changing how organizations approach ethics and compliance training. Developed by experts in the field, vetted by Baker McKenzie, and endorsed by the Society for Human Resources Management (SHRM) and the Association of Corporate Counsel (ACC), NAVEXEngage is the trusted training solution you need for your ethics and compliance program.

NAVEXEngage Is Designed to Be Accessible to Your Learners

Subscription Services

NAVEXEngage courses are designed to fit your ethics and compliance program and training needs. With decades of experience with real customers and their unique needs, we have developed a simple and effective set up approach that allow you to make a course uniquely your own. These include:

- Your logo on every screen within the training
- Integrating your policies in the training, allowing for quick and easy learner access
- Custom certificates of completion
- Integrating your personnel resources and contact information
- Course configuration to match your needs where courses have multiple modules (Workplace Harassment and Ethics & Code of Conduct)
- Mode selection (video, audio, text)

Additional customization available at implementation for a fee.

In Multiple Languages

NAVEXEngage courseware is designed to meet your global language needs. The courses in our library specific to US Domestic law are available in U.S. English, Canadian French, and Latin American Spanish. The remainder of our course library is available at no additional cost in fourteen standard languages. The translation of our courses into additional non-standard languages are available for a nominal fee.

Learning Management Systems

All NAVEX Global full-length courses are designed to be deployed and managed on a learning management system (LMS), an online software tool that allows you manage all of your organization’s users and the courses they view. It also allows you to run reports, and track learner progress and completion. An LMS is an essential tool for documenting and proving compliance and establishing legal defenses. Customers may use our LMS or an alternative SCORM, AICC, or xAPI compatible LMS.

NAVEX Global Partnerships

NAVEX Global is proud to partner with industry-leading organizations that help protect businesses, grow positive corporate cultures and provide key learning opportunities for our customer base. Included below are the organizations with whom we partner and produce our award-winning, legally-vetted content and with whom we have exclusive relationships for our training solutions.

Baker McKenzie is the first truly global law firm. Since their founding in 1949, they have been advising leading multinational and domestic companies on the issues of an integrated global
market. As a community of citizens of 60 nations, Baker McKenzie has a deep understanding and appreciation for the language and culture of business all over the world. This provides a distinctive ability to help clients anticipate and address the nuances of local markets as they pursue their global and regional business objectives with confidence. Baker McKenzie is a trusted partner of NAVEX Global and helps to ensure that our solutions are legally sound.

The Society for Human Resource Management (SHRM) is the world’s largest association devoted to human resource management. Representing more than 250,000 members in over 140 countries, the Society serves the needs of HR professionals and advances the interests of the HR profession. Founded in 1948, SHRM has more than 575 affiliated chapters within the United States and subsidiary offices in China and India. NAVEX Global is the exclusive online ethics and compliance training partner of SHRM.

The Association of Corporate Counsel (ACC) is the world’s largest organization serving the professional and business interests of attorneys who practice in the legal departments of corporations, associations, nonprofits and other private sector organizations around the globe. The ACC is the premier association for 34,000+ in-house counsels in over 85 countries. They are a highly-respected organization whose mission is to provide their members education, networking and practical resources. The ACC exclusively endorses NAVEXEngage™ Ethics and Compliance Training as their training vendor of choice. The ACC selected NAVEX Global in 2016 for both the legal accuracy of our content and the impact of its delivery.
Modern business moves fast, and it’s important to have the competitive advantage. But at what cost? Giving gifts can strengthen business relationships – but when do they cross the line?

Anti-Bribery and Corruption (Basics) provides critical information to employees who may not understand when gifts, entertainment or hospitality cross the line from business to bribe. Employees will learn about appropriate and inappropriate gifts and entertainment, with additional training on government and foreign officials and third parties. They’ll also review the critical role accurate recordkeeping plays in avoiding liability.

There is a place for gifts and entertainment in business. However, bribery is never welcome. Solid training is vital. Advanced version also available.

Learn more about the FCPA and UK Bribery Act.

All Learners

Key concepts covered in this course:

- Organizational policy on bribery
- Consequences of bribery
- Forms of bribery
- An explanation of the U.S. Foreign Corrupt Practices Act, UK Bribery Act, Brazilian Clean Companies Act and the Singapore Prevention of Corruption Act
Information on international treaties and conventions

Who can be a foreign official

Standards that apply to foreign officials

When gifts and entertainment may cross the line

Avoiding even the appearance of influence

Acceptable and unacceptable gifts

Government customers and foreign officials

Accurately recording gifts and entertainment

Who is a third party?

Organizational liability for a third party’s actions

Best practices for due diligence and monitoring

The purpose of good recordkeeping

The importance of integrity

Examples of suspicious activity

Raising concerns

Non-retaliation

Review of the critical role employees play

An opportunity to review key policies and certify
Bribery & Corruption: Prevention Is Everyone’s Responsibility

Corruption puts individuals, communities and organizations at serious risk, and it can happen in any workplace, in any country, to any person. This micro learning course emphasizes a zero-tolerance approach to corruption and the expectation for all employees to report it – regardless of job title.

Learn more about the FCPA and UK Bribery Act.
Code of Conduct: Why Our Values Matter

When employees face ethical challenges, it’s important they know where to turn – and why. This micro learning course highlights the importance of an organization’s Code of Conduct as a resource for understanding their organization’s values and priorities and for making decisions that reflect them.

ONLINE PREVIEW
Confidential Information and Intellectual Property

Confidential information can be as small as a fingerprint or as big as a business plan. It’s the details of an internal investigation or a secret ingredient for success. One breach or careless mistake can put an entire organization at risk. Do employees know how to protect confidential information? Are they aware of the potentially devastating consequences of failing to keep it safe?

Confidential Information identifies key pieces of data that require protection.

The course provides examples of personal and management information, as well as business information and trade secrets. Employees will explore critical concepts in intellectual property and will learn best practices for protecting confidential information. Learners will engage with entertaining animations, video and real-world scenarios to get the knowledge they need.

Protecting confidential information is everyone’s responsibility. In-depth training increases the likelihood that employees will recognize this important information and take the right steps at the right time to protect it.

All Learners

Key Concepts Covered In This Course:

The introduction and closing modules of this course bookend the topic-specific content modules clients can select to build their course. Choose the modules you require for your organization.

- Examples of personal, management and business information and trade secrets
The difference between public and confidential information

Guidance on seeking help and reporting improper disclosures

Definitions and examples of patents, trademarks, service marks, copyrights and trade secrets

Ownership of intellectual property

A discussion of trade secrets

Best practices for using and protecting intellectual property

Best practices for protecting personal, management and business information and trade secrets

Guidelines for preventing and handling theft and loss

Handling and storage best practices

When to raise concerns or seek help

Assurance the organization will investigate reports and take action as necessary

A restatement of non-retaliation policy

The value of each employee in preserving the organization’s reputation and maintaining an ethical workplace
Conflicts of Interest

Personal pursuits and relationships outside the workplace can lead to richer, more fulfilling lives for employees. Inside the workplace, gifts and entertainment given or received in the course of a job can strengthen business bonds. This all adds up to a better working environment. But what happens when these situations conflict with the interests of the organization or put an organization at risk?

Conflicts of Interest provides critical guidance on recognizing and handling conflicts – or potential conflicts – that can threaten organizational integrity. Learners will explore how conflicts in key areas can harm their employer and put jobs at risk. Animation, video and interactive scenarios engage learners and drive home critical points and best practices.

Employees have an obligation to avoid conflicts and maintain organizational integrity. Strong training can increase accountability and reduce risk, creating a culture where doing the right things – both inside and outside the workplace – is second nature.

All Learners

Key concepts covered in this course:

- A definition of “conflicts of interest”
- Situations where conflicts may exist
- Key questions to ask if you suspect a conflict
- Disclosing actual or perceived conflicts
- Determining generally acceptable gifts
- Caution when giving gifts or offering hospitality to government officials
Best practices for handling questionable offers

Seeking outside employment or positions with competitors or customers

Best practices for responsible charitable and political activities

Maintaining conflict-free board memberships

Keeping work and outside activities separate

Investment in competitors or companies who do business with the learner’s organization

Starting a competing side business

Taking personal advantage of business opportunities discovered through employment

Situations that can affect judgment or create a conflict

Best practices for preventing personal relationships from creating a conflict

When to raise concerns or seek help

Assurance the organization will investigate reports and take action as necessary

A restatement of non-retaliation policy

The value of each employee in preserving the organization’s reputation and maintaining an ethical workplace
Conflicts of Interest: Identifying and Handling a Conflict

Could you have a conflict of interest? How can you find out? And what should you do next? This micro learning course addresses these important questions by first helping learners to identify what conflicts of interest can look like, providing them with questions they can ask themselves to determine if one exists and steps they can take if they find that they have one.

ONLINE PREVIEW
https://www.navexglobal.com/en-us/products/online-ethics-compliance-training/learning-courses/conflicts-interest-identifying-and
Data Privacy: Managing Fourth-Party Risk

When it comes to protecting data, organizations are responsible for the actions of their third-party business partners. They can also be held responsible for the actions of fourth parties: the vendors and suppliers that those business partners may use. Learners who frequently interact with these third and fourth parties will benefit from this micro learning course’s practical guidance on monitoring these businesses.

COURSE LENGTH
< 10 min

COURSE TYPE:
Micro Learning Course

COURSE CATEGORIES
Information Security Training

AUDIENCE
All Learners

TOPIC
Data Privacy

FORMAT
Rich Media

ONLINE PREVIEW
Ethical Leadership: Managing with Integrity

Everyone in an organization has a responsibility to follow policy, act ethically, and protect organizational assets and reputation. However, supervisors set the example. Employees look to leadership for guidance, and nothing is more important than modelling correct behavior. Ethical Leadership: Managing with Integrity drives home critical topics supervisors need to know in order to lead with integrity and respect. This course elevates awareness of effective communication techniques and best practices for handling employee reports. Strong emphasis is placed on keeping an open door and properly handling reports and investigations, while avoiding any form of actual or perceived retaliation.

Download the Online Training Overview datasheet here ›

Managers

Key concepts covered in this course:

- Setting high standards and leading with integrity
- Leadership obligations to follow policies and protect the organization, its assets, and its people
- Best practices for maintaining an open door policy so employees can raise concerns
- Important steps to take when an employee shares a concern
- Identifying, addressing and/or reporting any potential ethical violations
- The importance employee reports play in helping uncover potential issues
The prohibition on retaliation in any form, and examples of retaliation
Ethics and Code of Conduct

When employees are aligned around a core set of values and understand how they can promote a culture of ethics and compliance, organizations succeed. And the best way to ensure they do the right thing? Provide all your employees with engaging, high-quality Code of Conduct training.

The NAVEXEngage Ethics & Code of Conduct course is a critical tool for organizations serious about cultivating and maintaining an ethical workplace. Composed of 16 topical 5-minute modules, customers can construct a course unique to their own concerns. Whereas customers can use any modules they need, most select specific modules to build a 30 to 60 minute course. Leveraging clear instruction, current video scenarios, state-of-the-art animation, engaging interactions and more, this course is a must for any organization looking to train beyond rule-giving to a true Code of Conduct training experience.

Download the Ethics & Code of Conduct Course Overview datasheet here ›

All Learners

Key Concepts Covered In This Course:

The introduction and closing modules of this course bookend the topic-specific content modules clients can select to build their course. Choose the modules you require for your organization.

- The importance of integrity
- Supporting the Code and values through action
- Manager obligations and responsibilities
- Non-retaliation policy
The definitions of a bribe

Best practices for working with third parties

Improper agreements

The importance of free and open competition

Types of confidential information

Protecting intellectual property

Guidance for disclosing perceived, potential or actual conflicts

The importance of speaking up to stop discrimination

Key fraud-prevention techniques

Best practices for documenting and reporting gifts, entertainment and hospitality

Discussion of sexual harassment

Examples of bullying and mobbing

Best practices for avoiding conflicts between political pursuits and organizational interests

Best practices for proper asset storage

Rules for responding to the media and general public

Due diligence procedures for third parties

Examples of workplace violence

The importance of speaking up
Financial Integrity: Working with Honesty and Transparency

Employees who maintain the accuracy of records and comply with internal controls help ensure the proper oversight and accountability of your organization’s assets and help you meet your financial, legal and regulatory obligations. This course emphasizes that financial integrity isn’t just the responsibility of the accounting team – it’s the responsibility of every employee at every level of your organization. From filling out expense reports and benefits enrollment forms to time cards, invoices, payroll and safety records – it sends the message that maintaining good record keeping practices is good business.

Download the Online Training Overview datasheet here ›

All Learners

Key concepts covered in this course:

- Definition of financial integrity
- Why the integrity of business records is critical
- How financial integrity is a shared responsibility
- Definition of record
- Importance of maintaining timely, accurate and complete records
- Obligations of accounting and finance employees
Protecting information from unauthorized disclosure

Compliance with records management policy

Ethical sales practices

Financial misconduct: fraud, bribery and money laundering

Reporting violations

ONLINE PREVIEW
Global Data Privacy

This course delivers training to show employees best practices for ensuring that personal data is not misused or put at risk of unauthorized exposure. Using a combination of engaging videos, animations and interactive exercises, this course provides a solid, foundational knowledge of basic data privacy concepts. Employees learn how to safely handle personal data and how to quickly and appropriately respond to potential or actual data breaches. Written to comply with key data privacy requirements, like the Global Data Protection Regulation (GDPR), this course includes guidelines for safely using technology, as well as role-specific information for employees who may handle more personal data as a part of their job.

Download the Online Training Overview datasheet here ›

All Learners

Key concepts covered in this course:

- What is personal data
- How do you protect personal data
- Guidelines for responding to a data privacy breach
- Role-based best practices for handling and protecting personal data
- Value of policies and procedures
- How and when to speak up about potential, suspected or actual data privacy breaches
ONLINE PREVIEW
Social Media: Sharing Responsibly

Social media can be a powerful tool; a simple post from an employee has the potential to influence the reputation of the organization they work for – positively or negatively. This micro learning course addresses this by stressing the importance of sharing content carefully and offering practical advice for responsible social media use.

COURSE LENGTH
< 10 min

COURSE TYPE:
Micro Learning Course

COURSE CATEGORIES
Conduct Training

AUDIENCE
All Learners

TOPIC
Social Media

FORMAT
Rich Media

ONLINE PREVIEW
Workplace Harassment: It’s About Respect

When it comes to preventing harassment, lists of rules and unacceptable behaviors can be overwhelming and ineffective. This micro learning course shifts the emphasis from specific behaviors to general principles of respect and empathy, and consideration for how words and behaviors will impact others.

ONLINE PREVIEW