

Best Practices in Creating and Maintaining an Effective Code of Conduct

University of Texas Corporate Counsel Institute
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Morehead Compliance Consulting

1. Purposes of a Code of Conduct
2. Broad Expectations and Best Practices
3. Code of Conduct Development
Process
4. Criteria for Evaluating a Code of
Conduct
5. Code Benchmarking Data



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Purposes of a Code of Conduct



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"A company's code of conduct is often the foundation upon which an effective compliance program is built."

-A Resource Guide to the US FCPA, USDOJ/SEC



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What do we expect from a foundation?

Solid &
Well
Planned

Must be
purpose-
built &
unique to
your
organization

Must
support
everything
else

Must be
maintained



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A Practical Risk
Roadmap

A Mission
Statement That
Establishes Tone

Code

The Hub of the
Wheel

Framework for
Program
Communication



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