

# Best Practices in Creating and Maintaining an Effective Code of Conduct

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Process
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Conduct
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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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38<sup>th</sup> Annual Corporate Counsel Institute session  
"Best Practices: The Code of Business Conduct"