

# Ethics Policy

## 1.0 Purpose

This policy establishes the organization's commitment to upholding the highest standards of ethical conduct in all business practices. It serves as a guide for employees and affiliates, emphasizing the expectation of fairness, honesty, integrity, and trust in all interactions. The purpose is to foster a culture of openness, ensure fair business practices, protect the organization and its stakeholders from impropriety, and guide behavior to align with our core values and legal obligations. Effective ethics is a collective responsibility requiring the active participation and support of everyone associated with the organization.

## 2.0 Scope

This policy applies to all employees at all levels, directors, officers, contractors, consultants, temporary staff, agents, and other workers conducting business for or on behalf of the organization, including personnel affiliated with third parties when interacting with or representing the organization.

## 3.0 Policy Statements

### 3.1 Foundational Principles

- \* All business conduct must adhere to the highest standards of honesty, integrity, and fairness.
- \* All interactions, whether internal or external, must be based on mutual respect.
- \* Compliance with all applicable laws and regulations is mandatory.
- \* The intent and appearance of unethical or compromising practices must be avoided.

### 3.2 Leadership Commitment

- \* Senior leaders and executives must set a clear example of ethical conduct and champion the organization's ethical values.
- \* Leadership must foster an environment where ethical concerns can be raised without fear of retaliation, maintaining an "open door" approach to suggestions and concerns.
- \* Executives must promptly disclose any actual or potential conflicts of interest related to their position or responsibilities within the organization.

### 3.3 Employee Commitment

- \* Employees are expected to treat colleagues, customers, vendors, and partners fairly and with respect, promoting a positive and collaborative team environment.
- \* Employees must apply diligence and sound judgment to uphold ethical standards in their daily work.

- \* Employees must promptly disclose any actual or potential conflicts of interest related to their position or responsibilities.
- \* Employees contribute to customer and vendor satisfaction by providing quality products/services and responding professionally and promptly to inquiries.
- \* Employees are encouraged to evaluate the ethics of any situation by considering questions such as:
  - \* Is it legal and compliant with all organizational policies?
  - \* Does it reflect the organization's values?
  - \* Could it negatively impact stakeholders (customers, employees, partners, the organization)?
  - \* Would I be comfortable if this action appeared in a news headline?
  - \* Could it harm the organization if everyone acted this way?

### **3.4 Maintaining an Ethical Culture**

- \* The organization will actively promote ethical conduct and awareness through training, communication, and reinforcement from leadership.
- \* Open dialogue, honest feedback, and objective treatment are encouraged to support an ethical atmosphere.
- \* A designated body (e.g., Ethics Committee, Employee Resource Team, HR Department) is established to oversee the communication of this policy, provide guidance, and address concerns related to ethical conduct.

### **3.5 Conflicts of Interest**

- \* All employees and leaders must avoid situations where personal interests could conflict, or appear to conflict, with the interests of the organization. Full disclosure of any such potential or actual conflicts is required.

### **3.6 Use of Company Assets and Information**

- \* Organizational assets, resources, and business relationships must not be used for personal gain or unauthorized purposes.
- \* Unauthorized use, disclosure, or appropriation of confidential or proprietary information (including trade secrets, financial data, source code, personnel information, etc.) is strictly prohibited and will not be tolerated.

### **3.7 Harassment and Discrimination**

- \* The organization maintains a zero-tolerance policy for harassment or discrimination of any kind. All employees are entitled to a respectful work environment. (Refer to specific Anti-Harassment/Non-Discrimination policies for details).

### **4.0 Reporting Ethical Concerns**

- \* Employees are encouraged and expected to report any observed or suspected violations of this policy, illegal activities, or unethical conduct.
- \* Reports can typically be made to an employee's direct manager, the Human Resources

department, or the designated ethics body/contact. (Organizations may also include specific reporting channels like a hotline here).

\* The organization prohibits retaliation against any individual who, in good faith, reports an ethical concern or participates in an investigation.

## **5.0 Training and Acknowledgment**

\* All employees are required to familiarize themselves with this Ethics Policy.

\* Employees will be required to complete periodic ethics training and acknowledge their understanding and compliance with this policy, typically on an annual basis.

## **6.0 Compliance and Enforcement**

### **6.1 Compliance Measurement**

Compliance with this policy will be monitored and verified through various methods, including but not limited to, internal/external audits, review of business practices, investigation of reported concerns, and feedback mechanisms, overseen by the designated authority (e.g., Employee Resource Team, HR, Internal Audit).

### **6.2 Consequences of Violations**

\* Any violation of this Ethics Policy is a serious matter and will be addressed promptly.

\* Employees found to have violated this policy will be subject to disciplinary action, which may include warnings, reprimands, suspension, or termination of employment, depending on the severity of the violation.

\* Violations may also have legal consequences.

## **7.0 Related Policies**

Users should also be familiar with policies related to:

- \* Code of Conduct (if separate)
- \* Anti-Harassment and Non-Discrimination Policy
- \* Conflict of Interest Policy (if separate)
- \* Information Security / Data Protection Policies
- \* Acceptable Use Policy
- \* Whistleblower Policy (if applicable)

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