



# ELEMENTS OF AN EFFECTIVE ETHICS PROGRAM

## ETHICS INVESTIGATIONS

### WHAT IS AN ETHICS INVESTIGATION?

A fair, timely and thorough investigation should be conducted in the event you receive credible evidence that misconduct has occurred. The investigator collects the facts needed to determine whether it is “more likely than not” that the alleged misconduct occurred.

### WHY CONDUCT AN INVESTIGATION?

- ✓ Understand whether and how misconduct occurred so it can be addressed and prevented
- ✓ Determine whether disclosure to US government is necessary

### OTHER RESOURCES

**DII Small Business Toolkit:**  
[www.dii.org/featured-tools](http://www.dii.org/featured-tools)  
**Lockheed Martin *How the Ethics Process Works* brochure:** [www.lockheedmartin.com/content/dam/lockheed-martin/eo/documents/ethics/how-ethics-process-works.pdf](http://www.lockheedmartin.com/content/dam/lockheed-martin/eo/documents/ethics/how-ethics-process-works.pdf)



#### CONDUCT INTAKE

When a reporting party comes forward, ask questions and take detailed notes about the allegation, where and when it happened, for how long, and who was involved. Thank the person for speaking up and explain that all contacts to Ethics are kept confidential.



#### PLAN INVESTIGATION

Consider what evidence you would need to determine whether the alleged incident(s) occurred, including who you should interview and in what order to create an investigative plan. Update plan and/or review with other internal investigators as necessary.



#### GATHER EVIDENCE

Collect documentary evidence (emails, time cards, personnel files, expense reports, etc.) and interview witnesses and subject matter experts.



#### INTERVIEW SUBJECT

Lastly, present allegations to the Subject of the investigation and offer them a chance to explain what happened from their perspective.



#### WRITE REPORT OF INVESTIGATION

Consolidate your findings into a formal investigative report that summarizes the allegations, investigation process and evidence collected and concludes whether or not the allegation is substantiated.



#### CLOSE OUT WITH RP AND SUBJECT

Inform both the reporting party and the Subject that the allegations were substantiated or unsubstantiated. Remind both of the company’s non-retaliation policy and thank them for their cooperation.