



# ELEMENTS OF AN EFFECTIVE ETHICS PROGRAM PROGRAM STRUCTURE

## WHAT IS AN ETHICS & BUSINESS CONDUCT POLICY?

An Ethics & Business Conduct Policy documents the company's ethics program, outlining key program elements like the code of conduct and training, and describing the roles and responsibilities of leadership. It should also explain how employees can report misconduct.



## WHY CREATE AN ETHICS & BUSINESS CONDUCT POLICY?

- ✓ Formalize your ethics program to make it more credible to employees, customers, regulators
- ✓ Communicate how the ethics program works

## OTHER RESOURCES

**DII Small Business Toolkit:**  
[www.dii.org/featured-tools](http://www.dii.org/featured-tools)  
**Lockheed Martin Ethics & Business Conduct Policy:**  
[www.lockheedmartin.com/content/dam/lockheed-martin/eo/documents/ethics/cps-001.pdf](http://www.lockheedmartin.com/content/dam/lockheed-martin/eo/documents/ethics/cps-001.pdf)



### SELECT ETHICS PROGRAM LEADER

Choose someone to be responsible for the day-to-day operations of your ethics program. (S)he should have adequate resources, authority and independence.



### ORGANIZE ETHICS TEAM

If you have a team dedicated to ethics, decide whether ethics policies, training, communications, etc will be developed by corporate or by ethics staff in business units.



### ESTABLISH CROSS-FUNCTIONAL TEAM

If your ethics team has only one person, establish committees and working groups to help make decisions and implement your program. Appoint ethics liaisons across the business to serve as POCs.



### DRAFT POLICY

Download the DII Small Business Toolkit's Ethics & Business Conduct Policy template, customize the content and format, and make sure the document is easily accessible by all employees.