

Corporate Compliance Forms and Tools

Code of Conduct Self-Assessment

Code of Conduct—Content Assessment

Criteria	Do Not Have	Needs Improvement	Fully Included	Action Plan
Code is values-based and consistent with organization’s stated values				
Includes requirement of compliance with all applicable laws and regulations				
Written simply and concisely so all employees can understand the standards				
Translated into all other languages used by the organization				
Includes reference and links to key internal policies and procedures				
Includes references to key external regulations where appropriate				
Includes specific expectations for employee behavior				
Includes management’s responsibility to explain and enforce the code				
Is consistent with company policies and procedures				
Includes obligation to report suspected misconduct with detailed information and ideally links to reporting channels, including helpline information				

Includes statement that a failure to report potential violations is a separate violation				
Specifically prohibits retaliation of any kind				
Includes a commitment to organizational justice with promise to investigate all potential noncompliance with the code and to discipline all wrongdoers				
Addresses conflicts of interest and explains how to disclose them, including the potential for conflicts of interest related to the receipt and giving of gifts				
Specifically prohibits giving anything of value to a government official to obtain any type of benefit				

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