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The journey to a new code of conduct

By William J. Holzhauer

William J. Holzhauer (william.holzhauer@nationalgrid.com) is US Director of Ethics and Compliance at National Grid in Syracuse, New York, USA.

Like many organizations, mine has an Employee Code of Ethical Business Conduct. In my tenure as US director of ethics and compliance, we have revised the code three times and currently are in the process of updating the code again, which we do every three years. Each time we update the code, it needs to evolve with the changing times and our changing corporate values, and with new social considerations. In this article, I wanted to give an overview of the journey to my organization's new code.

I am part of a global team that includes members from the US and the UK. Our Employee Code of Ethical Business Conduct is a global document. In order to coordinate the review process, a global team was established to take the lead on reviewing the document. In addition, a schedule was developed for the review process. Approval of the new document would be required from senior management level ethics and compliance committees in both the US and UK. All of this was incorporated into the schedule.

Once the schedule was set, it was determined that we needed to take the following major steps.

1. Obtain employee input

Employee input is critical. Our employees are the ones who need to live under the code. Thus, the more you can do to make it their document, the more positive impact it will have on the employees.

Each time we go to revise the document, we reach out to our employee base and ask for their input on the code's content, tone, look, and feel. To date, we have received outstanding feedback from our employees—many things, as the authors, we had not considered. For example, sometimes the pictures we used in the code were not diverse enough. Or there was a topic that employees wanted covered in the code. This was all very good input that, again, will help drive ownership of the code by our employees. Lastly, engagement with our employees gives them a sense of ownership.