

<b>COMPANY LOGO</b>	Policy Number: #	Date: <b>Date</b>
	Policy Name: <b>Ethics &amp; Business Conduct</b>	Rev: #
	Approver: <b>Name</b>	Function: <b>Name</b>

**OVERVIEW**

This policy is to confirm **Company's** commitment to conduct business ethically and compliantly and to ensure all ethics and compliance issues are resolved appropriately according to our stated values, Code of Conduct, corporate policies, laws and regulations throughout our operations.

**POLICY**

All employees are personally responsible for conducting business both internally and externally with all stakeholders ethically and compliantly in accordance with our values, Code of Conduct, corporate policies, and in compliance with all laws and regulations globally.

As such, this policy provides the governance framework for reporting, capturing, handling, and resolving potential improper conduct and compliance violations.

**Issue Reporting**

Any stakeholder who suspects or becomes aware of any ethical misconduct of **Company** values, Code of Conduct, or any compliance violations of any laws or regulations is encouraged to report the issue to any of the following:

- Employee's supervisor/manager
- Any Human Resources or Legal representative
- Any compliance representative in the areas of **Ethics & Compliance, Internal Audit/Finance, etc.**
- Ethics hotline via internet or phone at  
**US 888-888-8888**  
**Web [www.xxx.com](http://www.xxx.com)**

In addition, any employee who has any concern or complaint regarding accounting, internal accounting controls, or auditing matters may also report the matter to the General Auditor or may also contact the Audit Committee on a confidential and/or anonymous basis by mail, c/o the Corporate Secretary, **1234 address Blvd., City, ST 11111.**

Retaliation

**Company** will not tolerate retaliation against any stakeholder that reports potential ethics and compliance concerns in good faith (a genuine attempt to provide honest, complete and accurate information, even if it later proves to be mistaken or unsubstantiated). Retaliation includes but is not limited to improper denial of benefits, termination, demotion, suspension, threats, improper poor performance evaluation, intimidation, harassment or discrimination.

Retaliation violates both the Code of Conduct and corporate policy, therefore all known or suspected retaliation cases should be reported for investigation and resolution through any of the reporting channels listed above.

Issue Capture

All ethics & compliance issues, regardless of the severity or nature (i.e., simple inquiry), shall be confidentially recorded and managed in **[location/tool]**.

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Issue Handling

**Company** is required to have a designated management team to ensure proper oversight of individual cases and case trends. This management team includes at a minimum the General Counsel and the leader of the Compliance and Ethics Department. As indicated in **Company's** Mandatory Disclosure policy, **Company's** General Counsel has the overall responsibility for evaluating **Company's** obligation to make a timely disclosure to the Government when **Company** has credible evidence of a significant overpayment or violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuities as found in Title 18 of the U.S. Code, or a violation of the civil False Claims Act.

Upon being informed of an issue, management team members should collaborate with each other to:

- Determine the action level (severity)
- Determine whether an investigation is warranted and, if so, define scope and assign an investigation leader

Investigation leader shall:

- Assemble all relevant information, conduct interviews, and perform records analysis
- Conduct a complete and impartial evaluation of the facts obtained
- Prepare an investigation report and recommendations for corrective actions

Details of all ethics & compliance issues, investigations and corrective actions are sensitive and confidential company information that should be shared on a need-to-know basis only.

Issue Resolution

The management team shall ensure that the resolution of all cases is complete and documented, and that appropriate corrective actions are identified and instituted. Such action can include making a disclosure to the U.S. Government, including a mandatory disclosure.

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