



An Effective Code of Conduct:

**What “doing the right thing”
looks like**

Introduction

At the heart of a company's reputation are its employees. Each acts as an ambassador for their employer, shaping the relationships with customers, suppliers and other business partners, and in doing so ultimately influencing the company's stock price. Your Code of Conduct – the backbone of your compliance program – is an opportunity to communicate your company's ethical compass, inspire employees to lean in, and contribute to good decision-making.

Beyond its internal purpose, your Code of Conduct is a useful tool for investors, potential business partners, government agencies and other stakeholders to take a look *into* your company culture to learn more about how you promote values, ethical behaviors and operate with purpose (indeed, many of the Codes of Conduct we reviewed are hosted on IR webpages and cross-referenced from other internal and external company webpages).



Conviction, ownership and the “tone from the top” with content that is purpose-driven and speaks to the organization's values



Meaningful and focused content with practical and relevant instructions that avoids boilerplate language and is aligned with the business

A MESSAGE

Unilever's reputation for doing business with integrity and with respect for all those with whom it interacts goes back to the very origins of the company. Indeed, businesses that formed Unilever are among the most respected and most important in the world.

RESPECT PEOPLE

PEOPLE SHOULD BE TREATED WITH HONESTY AND FAIRNESS. UNILEVER EMPLOYEES CELEBRATE THE DIVERSITY OF PEOPLE, AND RESPECT PEOPLE'S RIGHTS AND WHAT THEY BRING TO THE WORKING ENVIRONMENT.

CODE OF BUSINESS PRINCIPLES AND CODE POLICIES



So how does your Code of Conduct look and read? Does it feel like a document that reflects your company's culture? Is it drafted in a way that is straightforward, relatable and easily consulted as questions arise? Or, are you "ticking the box" with a Code of Conduct that reads like an employment formality which is quickly forgotten??

To be relevant and influential (and, accordingly, support your compliance program), your Code of Conduct needs to be structured and presented in a way that makes it effective.

So what does a good and effective Code of Conduct look like? Over the following pages, we look at the best examples from our sample through the following lenses:



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An impactful call to ethical behaviors... and reporting when necessary, including an established framework for speaking up and decision-making

GLOSSARY

Code Support Line

Confidential online and telephone service, allowing the user to raise a concern about an actual or potential breach of the Code or Code Policies. Ask a question if clarification is needed or a check back on the status of a concern.



An inspiring user experience to ensure "readability" created by visually engaging design, an easy to reference structure and clear, inclusive language

The following pages highlight worldwide best practices from a selection of Codes of Conduct published by some of the world's largest corporations. The information within guides the

behavior of their employees, while offering current and potential investors a look into their corporate culture.

SCOPE

We reviewed 90 Codes of Conduct prepared by corporations domiciled in the world’s top 5 economies:

United States

- Walmart
- ExxonMobil
- Apple
- Berkshire Hathaway
- McKesson
- United Healthcare
- CVS Health
- General Motors
- Ford Motor
- AT&T
- GE
- AmerisourceBergen
- Verizon
- Chevron
- Costco
- Fannie May
- Kroger
- Amazon
- Walgreens
- HP Inc.
- Express Scripts
- J.P. Morgan Chase
- Boeing
- Microsoft
- Bank of America
- Wells Fargo
- Home Depot
- Citigroup
- Phillips66
- IBM
- Valero
- Anthem
- Procter & Gamble
- State Farm
- Alphabet
- Comcast
- Target
- Johnson & Johnson
- Metlife
- Archer Daniels Midland
- Marathon
- Freddie Mac
- United Technologies
- Aetna
- Lowes
- UPS
- AIG
- Prudential

United Kingdom

- Royal Dutch Shell
- BP
- HSBC
- Tesco
- Prudential
- Vodafone
- Unilever
- Barclays
- Lloyds
- SSE

Germany

- Volkswagen
- Bayer
- Daimler
- BASF
- Siemens
- SAP
- Deutsche Telekom
- BMW
- Allianz
- Henkel

China

- Industrial and Commercial Bank of China
- China Construction Bank
- Agricultural Bank of China
- Bank of China
- Ping An Insurance Group
- China Mobile
- China Petroleum & Chemical Corporation
- Bank of Communications
- China Merchants Bank
- China Life Insurance

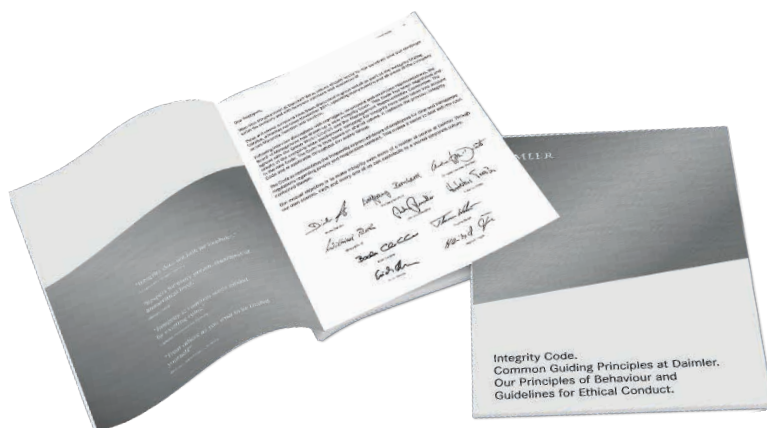
Japan

- Toyota Motor
- Mitsubishi Financial
- Sumitomo
- Nippon Telegraph
- Honda
- Softbank
- Mizuho Financial
- Nissan Motor
- Mitsubishi Corporation
- Hitachi

Conviction, Ownership and the “Tone from the Top”

In our view, the most effective Codes of Conduct speak to each corporation’s values and how they are upheld – sometimes in different ways – through the behaviors of management and employees. Codes that align purpose, values and ethical standards create a compelling message.

Each member of German automobile manufacturer **Daimler’s** Supervisory Board signs a letter at the beginning of the company’s Integrity Code, creating a sense of shared responsibility. The Code gives a voice to employees throughout the world who share what integrity means to them in quotes presented throughout the document.



British financial firm **Lloyds’** Code of Responsibility highlights the Board’s commitment to collective responsibility through a quote from the company’s non-executive director and Chair of the Responsible Business Committee.



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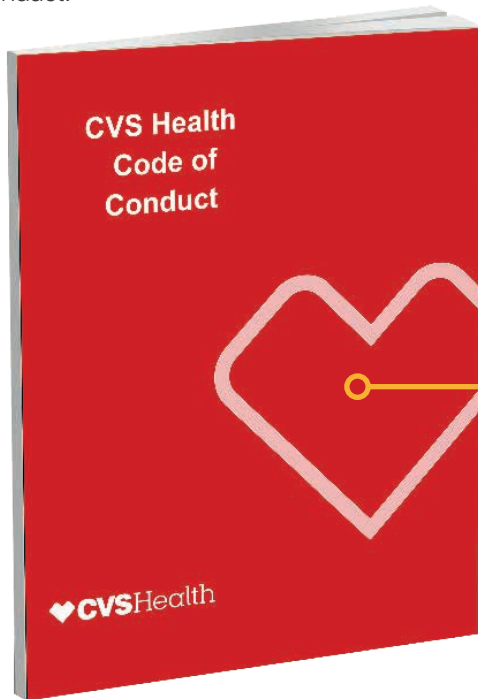
Daimler Integrity Code

<https://www.daimler.com/documents/sustainability/integrity/daimler-integritycode.pdf>

Lloyds Code of Responsibility

http://www.lloydsbankinggroup.com/globalassets/documents/our-group/responsibility/policies-and-codes/code_of_personal_responsibility.pdf

CVS Health's President and CEO Larry Merlo communicates the shared responsibility for the company's reputation in a letter to all employees which is presented on the first page of the company's Code of Conduct.



Microsoft's Standards of Business Conduct are presented as a concise website which is introduced by a personal and sincere letter from the company's CEO, Satya Nadella.



LEARN MORE

CVS Health Code of Conduct

https://cvshhealth.com/sites/default/files/CVS_Health_Code_of_Conduct_1.pdf

Microsoft Standards of Business Conduct

<https://www.microsoft.com/en-us/legal/compliance/buscond/default.aspx>



Anthem's Standards of Ethical Business Conduct outlines managers' responsibilities, encouraging them to serve as role models and lead by example.

In a similar manner, **BP's** Code of Conduct highlights employees responsibilities, and the additional responsibilities of the company's managers.



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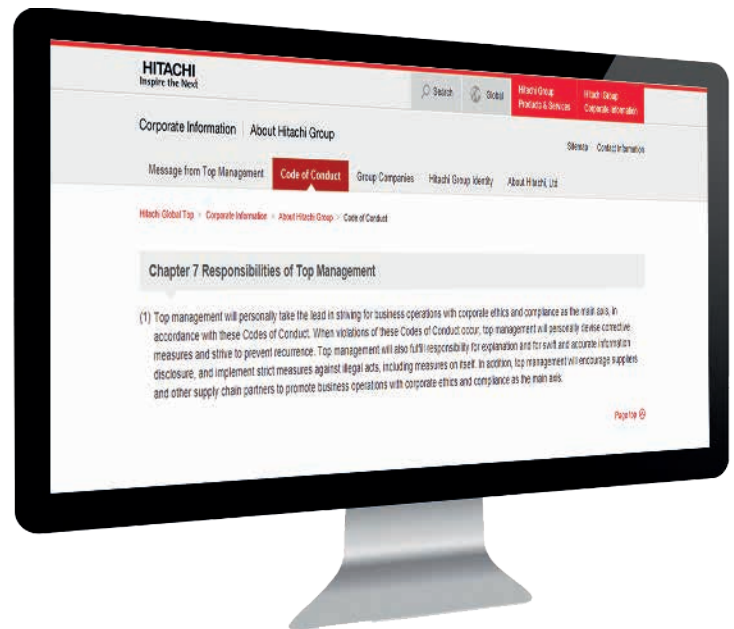
Anthem Standards of Ethical Business Conduct
<http://anthem.cmpsystem.com/file.php/1/public/SOEBc.pdf>

BP Code of Conduct
<http://www.bp.com/content/dam/bp/pdf/about-bp/code-of-conduct/bp-code-of-conduct-english.pdf>



Tesco PLC presents a reader-friendly Code of Business Conduct which explains how “colleagues” and “people managers” should use the document.

Japan's **Hitachi Corporation** emphasizes the responsibilities of “Top Management” in its concise Global Code of Conduct, which is presented on a dedicated minisite.



LEARN MORE

Tesco Code of Business Conduct

https://www.tescopl.com/assets/files/cms/Code_of_business_conduct_2015.pdf

Hitachi Group Code of Conduct

<http://www.hitachi.com/corporate/about/conduct/index.html>

Chevron’s Business Conduct and Ethics Code presents a clear overview of roles and responsibilities – including the obligation to “speak up” in case of an ethics violation.



Procter & Gamble begins its Worldwide Business Conduct Manual with a crisp presentation of the company's Purpose, and goes on to tie values and principles back to that core purpose throughout the manual.

In a similar manner, Anglo-Chinese financial firm **HSBC** presents “Why what we do matters” at the beginning of its Charter.



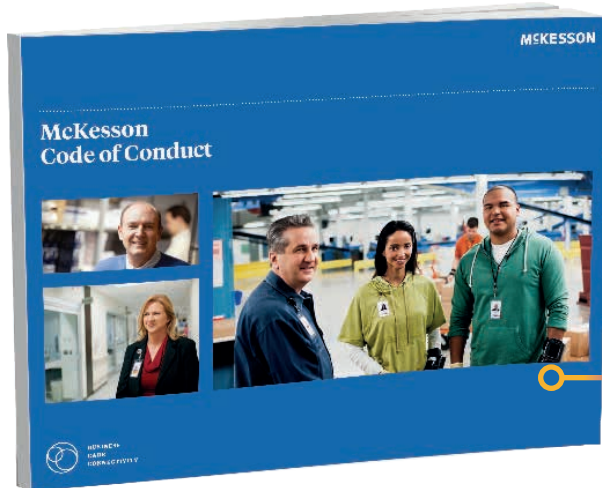
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Chevron Business Conduct and Ethics Code
<https://www.chevron.com/-/media/chevron/shared/documents/chevronbusinessconductethicscode.pdf>

HSBC Charter
<http://www.hsbc.com/our-approach/our-values/our-charter>

Procter & Gamble Worldwide Business Conduct Manual
http://us.pg.com/en-us/-/media/PGCOMUS/Documents/PDF/Who_We_Are/World%20Business%20Conduct%20Manual/Policy_Worldwide_Business_Conduct_Manual%20pdf.pdf?la=en-US&v=1-201611181810

McKesson's Code of Conduct presents its “iCare” core values that form the cornerstone of the company’s corporate culture and are presented consistently across the company’s reporting and website.



ICARE Guides Us

Everything we do at McKesson is driven by our Shared Principles, known as ICARE. These principles are a unifying force, connecting us across business units, geography, and functional areas. These values shape the corporate culture at McKesson. Our Shared Principles enable us to make a positive difference among our stakeholders, including customers, communities, shareholders, and each other.

i care Shared Principles

INTEGRITY	CUSTOMER-FIRST	ACCOUNTABILITY	RESPECT	EXCELLENCE
We do what's right. Integrity is the impartial and honest standard by which we make decisions and take actions, large and small, every day. In our business, integrity is a mandatory standard.	We build our success on customer success. We put our customers first, no matter what job we hold, where we're located, or whether we work alone or as part of a team. A customer is potentially anyone internal or external to whom we have a responsibility to help succeed.	We take personal responsibility. We drive results (versus just actions) with an emphasis on quality, safety, and accuracy, and hold ourselves accountable for results that are on-time and within budgets.	We treat people with dignity and respect. We are diverse as both people and professionals, and our success depends on our mutual trust and teamwork. Diversity builds strength in our team to contribute to our highest capabilities.	We insist on the best. We consistently strive to find new ways to innovate and measure our progress and celebrating successes. Excellence creates a sense of pride for us individually and as a company.

Wells Fargo's recently updated Code of Ethics speaks frankly to “...rebuild trust and restore pride in our company and mission”, and places employees at the heart of that mission.



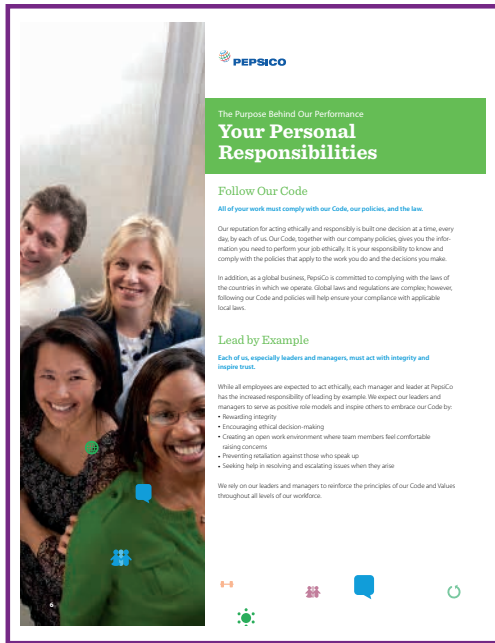
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McKesson Code of Conduct

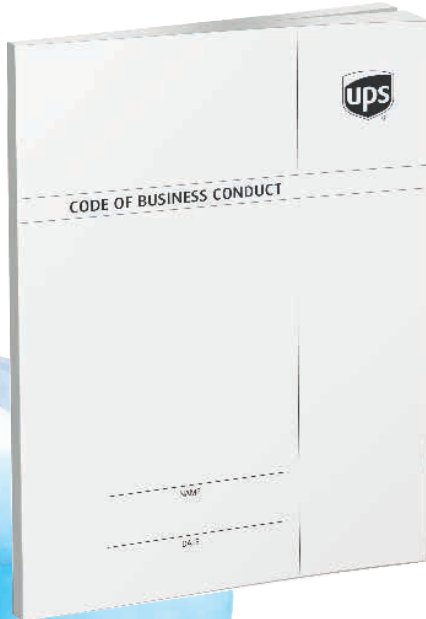
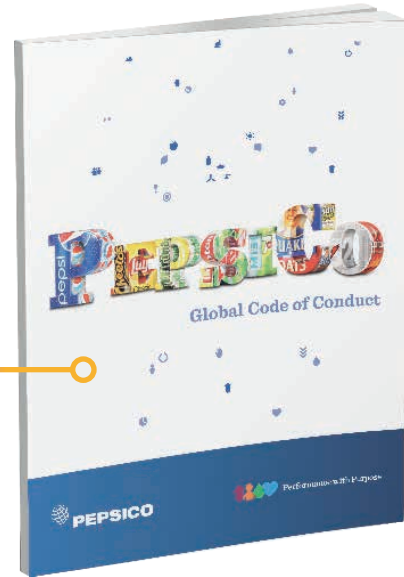
http://www.mckesson.com/uploadedfiles/mckessoncom/content/investors/corporate_governance/mckesson_code_of_conduct.pdf

Wells Fargo Code of Ethics & Business Conduct

<https://www08.wellsfargomedia.com/assets/pdf/about/corporate/code-of-ethics.pdf>



PepsiCo's Global Code of Conduct makes it personal. In a dedicated section titled, “Your Personal Responsibilities”, clear ownership for acting with integrity and inspiring trust is assigned to each of the company’s employees.



UPS's code of Business Conduct is distributed to employees who sign and “own” their copy.

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PepsiCo Global Code of Conduct

https://www.pepsico.com/Assets/Download/CodeOfConduct/English_GCOC_2014.pdf

UPS Code of Business Conduct

https://www.ups.com/media/en/code_bus_conduct.pdf

An Inspired User Experience

The best Codes of Conduct present strong visuals that align with corporate branding to create a document that feels more like a communications tool than a legal exercise. In the most engaging documents, visual signposts, flowcharts and graphics are used to further reader understanding.

Beyond design, the most memorable Codes of Conduct speak in a clear and accessible tone of voice using straightforward language.

HP Inc. presents a visually compelling Ethics minisite within the “Sustainability” section of its corporate website, and begins with the statement that, “99.97% of active employees, including every senior executive, completed a one-hour Standards of Business Conduct training course in 2015.”



LEARN MORE

HP Inc. Corporate Ethics

<http://www8.hp.com/us/en/hp-information/global-citizenship/governance/ethics.html>



J. P. Morgan Chase's Code of Conduct is a thoughtfully presented PDF divided into sections, with interactive navigation cues to make the document easier to review.



Vodafone's Code of Conduct is animated by photography of the company's employees “owning” principles from the Code.



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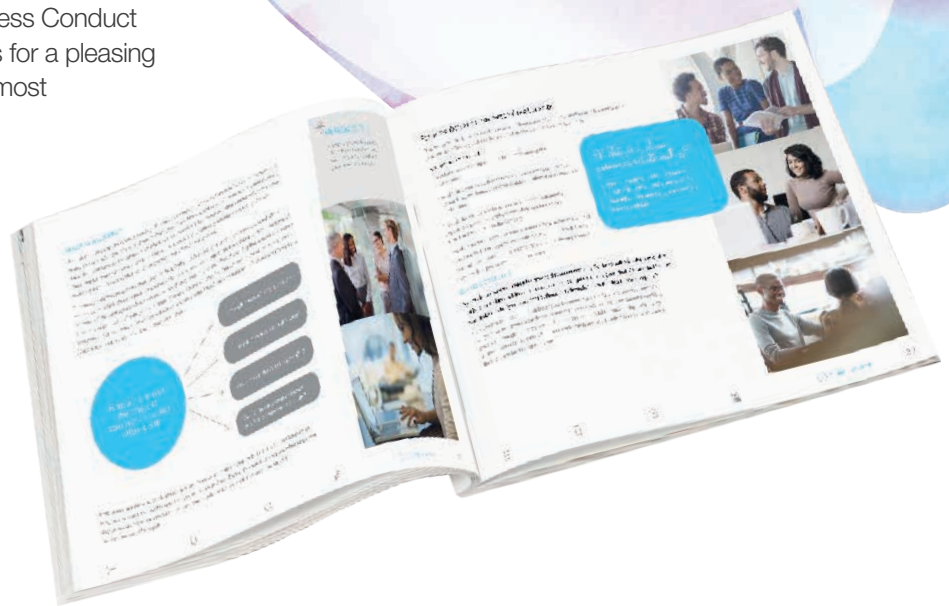
JP Morgan Chase Code of Conduct

<https://www.jpmorganchase.com/corporate/About-JPMC/document/code-of-conduct.pdf>

Vodafone Code of Conduct

https://www.vodafone.com/content/dam/sustainability/pdfs/vodafone_code_of_conduct_2012.pdf

Johnson & Johnson's Code of Business Conduct is well presented, using frequent visuals for a pleasing reader experience and to highlight the most important topics.



BP uses clean design, uncluttered text and bright corporate colors to help readers navigate through its Code.

LEARN MORE

Johnson & Johnson Code of Business Conduct
https://www.jnj.com/_document?id=00000159-69fe-dba3-afdb-79ffcdd60000

BP Code of Conduct
<http://www.bp.com/content/dam/bp/pdf/about-bp/code-of-conduct/bp-code-of-conduct-english.pdf>

Target's Business Conduct Guide and British retailer **Tesco's** Code of Business Conduct use bright and cheerful illustrations to engage readers around important content.



Is there room for personality in a legal document? Alphabet's **Google** certainly thinks so, as it presents itself as a “dog” company and expresses concern for stressed-out cats in its (online) Code of Conduct:

Alphabet
Investor Relations

Google Code of Conduct

5. Dog Policy

Google's affection for our canine friends is an integral facet of our corporate culture. We like cats, but we're a dog company, so as a general rule we feel cats visiting our offices would be fairly stressed out. For more on this, see our Dog Policy.

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Target Business Conduct Guide

https://corporate.target.com/_media/TargetCorp/csr/pdf/business-conduct-guide-2016.pdf

Tesco Code of Business Conduct

https://www.tescopl.com/assets/files/cms/Code_of_business_conduct_2015.pdf

Google Code of Conduct

<https://abc.xyz/investor/other/google-code-of-conduct.html>

Meaningful Content

The best Codes take a “less is more” approach, prioritizing content most relevant to the business. Applicable laws, regulations and policies – often complex and intimidating – are presented in easy-to-understand terms and as they relate to situations arising in the ordinary course of business. These Codes require that employees at all levels are expected to act with integrity, personal responsibility and common sense.

Cardinal Health presents a simple, 10-point checklist of their Standards of Business Conduct.



Standards of Business Conduct

- 1. Act with integrity and in compliance with the law**
We work together, according to shared standards and values, to make wise decisions that foster a culture of trust and responsible business conduct.
- 2. Ask questions, seek guidance and raise concerns**
We ask questions, seek guidance and raise concerns in order to work together with confidence and trust.
- 3. Treat one another fairly and foster a safe, productive, diverse and environmentally responsible workplace**
We treat one another with dignity and respect and are accountable to one another to maintain a safe, productive, diverse and environmentally responsible workplace.
- 4. Avoid conflicts of interest**
We avoid activities or personal interests that create or appear to create a conflict of interest with respect to our responsibilities as Cardinal Health employees.
- 5. Compete responsibly in the marketplace**
We compete for business diligently, openly and honestly and are tenacious in fulfilling our commitments to customers.



Johnson & Johnson's Code of Business Conduct is particularly well put together with a prominent “credo” that that is consistent with the distinct brand. Beyond outlining employee responsibilities, J&J's Code also highlights the company's reciprocal responsibilities to its employees.

LEARN MORE

Cardinal Health Standards of Business Conduct

http://www.cardinalhealth.com/content/dam/corp/web/documents/fact-sheet/Cardinal%20Health-SBC_English_2013.pdf

Johnson & Johnson Code of Business Conduct

https://www.jnj.com/_document?id=00000159-69fe-dba3-afdb-79ffcdd60000



Anglo-Dutch **Unilever's** Code of Business Principles and Code Policies presents a section to highlight how people should behave towards one another to achieve their fullest potential.

Our Commitments

Managing an individual's personal information respectfully, responsibly and in accordance with all applicable laws builds trust individual-by-individual, serves our business objectives and fosters enduring relationships with our stakeholders.

Protect Personal Information

Protecting personal information is critical to our enterprise.

- Personal information is a broad term that may include social security numbers or similar national identification numbers, dates of birth, financial and medical information and other information that identifies or relates to a particular individual.
- UnitedHealth Group receives personal information from or about individuals such as health plan members, customers, employees or other persons whose information is provided to or received by UnitedHealth Group or its business partners as part of our day-to-day business activities.
- We are trusted and required to reasonably and appropriately safeguard personal information and to use or disclose such information only as authorized by the individual or in compliance with all applicable laws.

Protect Privacy, Ensure Security

- Understand the rules regarding personal information. Recognize that part of your day-to-day responsibilities may include access to and use of someone's personal information and that the use or disclosure of such information is governed by law, regulations, customer contracts or company policies. If you are unsure how to appropriately handle such information, ask one of the Resources listed in this section.

Fulfill the obligations of your job.

When accessing or using personal information in your job, take care of it. Only use information that is required for your job, and only use the minimum amount. You also have an obligation to report the inappropriate access, use or disclosure of personal information. Report such activity to the business Privacy team lead, the UnitedHealth Group Privacy Office, or to the Compliance & Ethics HelpCenter right away.

Keep it private, keep it secure.

Always ensure that you are accessing, storing or disclosing personal information only as necessary for your job and only to the extent required for business purposes, and that you are doing so in a secure manner appropriate to the sensitivity of the information.

compassion



United Health's Code of Conduct speaks to managing the company's customers respectfully, responsibly and with compassion.

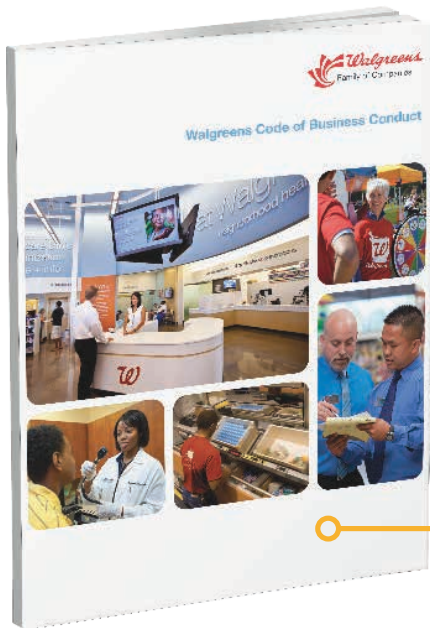
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Unilever Code of Business Principles and Code Policies

https://www.unilever.com/Images/4394-cobp-code-policies-booklet-external.v12_tcm244-480270_en.pdf

United Health Code of Conduct

<https://www.marchvisioncare.com/docs/UNH-Code-of-Conduct.pdf>



Walgreens Boots Alliance provides details in its Code of Business Conduct on how employees ensure that the company maintains the trust of investors by keeping honest, accurate financial reporting in compliance with the law and company policy.

A Foundation of Trust for Our Investors



The Home Depot's Business Code of Conduct and Ethics also addresses employees' responsibilities to shareholders, with a discussion of Insider Trading.

DOING THE RIGHT THING FOR OUR SHAREHOLDERS

PROTECTING THE COMPANY'S ASSETS AND INTELLECTUAL PROPERTY

While at work you will have access to important Company property and information. All associates should protect The Home Depot's property in order to benefit the shareholders and ensure that those who have a direct impact on our profitability. All Company assets should be used for the benefit of The Home Depot and never used to promote your own interests or those of another person or company.

Our intellectual property must be used properly and protected from infringement by others. The Home Depot logo, Home Depot advertisements and computer software are examples of assets that make up our intellectual property. Inventions, discoveries, ideas, concepts, written material and trade secrets that are created by associates using Company time, resources or materials are also the property of The Home Depot.

INSIDER TRADING

We comply with federal and state securities laws and do not tolerate insider trading. Insider trading means trading securities on the basis of material, non-public information or sharing material non-public information with another person so they can trade. "Material" information is information that a reasonable investor would likely consider important when making a decision to buy, sell or hold securities. Some examples of material, non-public information would include the following if not otherwise publicly disclosed:

- Earnings, revenues or other financial information
- Business conditions or strategies, including sales volumes, margins and conditions affecting our industry
- Potential mergers, acquisitions, tender offers, joint ventures or changes in assets
- Introduction of significant new products or services or business development initiatives
- Developments regarding customers or suppliers, including the gain or loss of customers or suppliers
- Changes in the control or management of The Home Depot
- Borrowing activities, or issues related to liquidity
- Events related to our securities (e.g. stock splits, dividend changes, share repurchases)

It is unethical and illegal to buy or sell stock or other securities on the basis of material non-public information. It is also illegal to communicate non-public information to any other person so that they may trade.

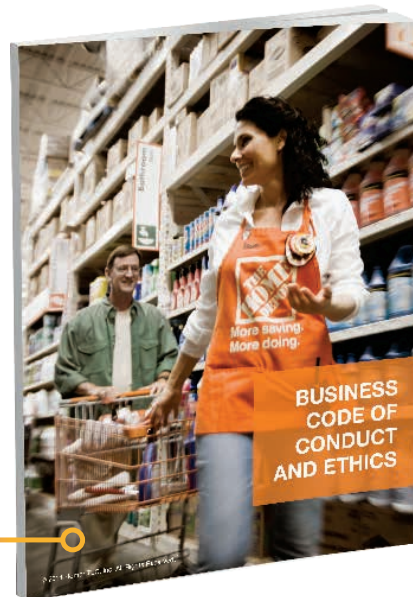
In addition, neither associates nor members of the Company's Board of Directors may enter into hedging or speculation transactions designed to limit the financial risk of ownership of Home Depot securities. These include prepaid variable forward contracts, equity swaps, collars, exchange funds and other similar transactions, as well as speculative transactions in derivatives of Home Depot's securities, such as puts, calls, options (other than those granted under a Home Depot compensation plan) or other derivatives.

Q I am good friends with Jack, a senior representative at ABC Company. Jack told me that ABC Company just landed a big sale with The Home Depot. Although an official announcement has not been made, can I purchase shares of ABC Company?

A No. This could be considered trading on the basis of material, non-public information and a violation of Company policy, as well as federal securities laws.

i To learn more about insider trading restrictions including who to call about a potential trade, visit the Securities Laws Policy available on MyHomeDepot.com or by calling Corporate Compliance.

10



LEARN MORE

Walgreens Code of Business Conduct

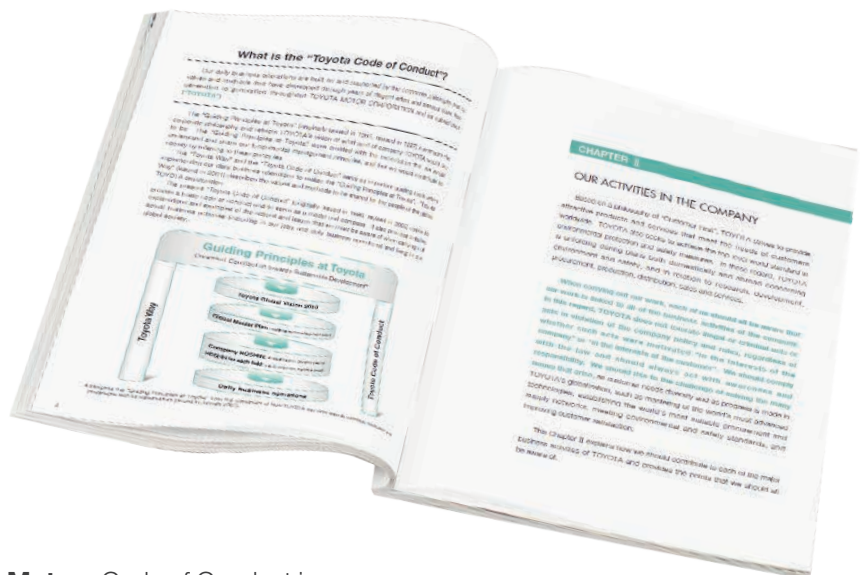
<http://files.shareholder.com/downloads/wag/686743208x0x145604/14561bf9-f748-4a6e-a9ea-ba2489876aed/ethics.pdf>

The Home Depot Business Code of Conduct and Ethics

<http://ir.homedepot.com/~media/Files/H/HomeDepot-IR/documents/governance-documents/business-code-of-conduct-and-ethics.pdf>



SSE, a British energy provider, uses its Guide to Ethical Business Conduct to explain the link between having a long-term sustainable business and their influence as “a social, economic and environmental force for good”.



In a similar manner, Japan's **Toyota Motors** Code of Conduct is as much an ethical guide for the company as for its employees, with a presentation of Guiding Principles, and how the company seeks to meet them (contribution to society, philanthropy...).

LEARN MORE

SSE A Guide to Ethical Business Conduct

http://sse.com/media/454977/Doing-the-right-thing_FINAL_Web.pdf

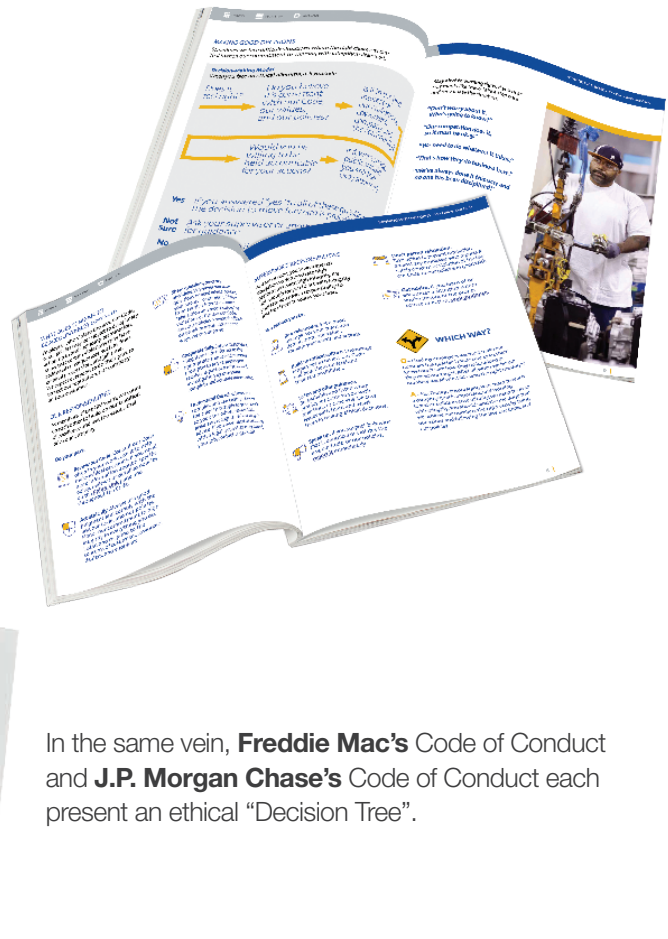
Toyota Code of Conduct

http://www.toyota-global.com/pages/contents/company/vision_philosophy/pdf/code_of_conduct.pdf

An Impactful Call to Ethical Behaviors... and Reporting When Necessary

The most effective Codes of Conduct bring reality to hypothetical circumstances, and provide a framework for decision-making that is practical and relevant to day-to-day business activities.

General Motors' Code of Conduct presents reader-friendly icons and a “decision-making model” to be adopted by employees facing an ethical dilemma.



In the same vein, **Freddie Mac's** Code of Conduct and **J.P. Morgan Chase's** Code of Conduct each present an ethical “Decision Tree”.

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General Motors Code of Conduct

https://www.gm.com/content/dam/gm/en_us/english/Group4/InvestorsPDFDocuments/WWI.pdf

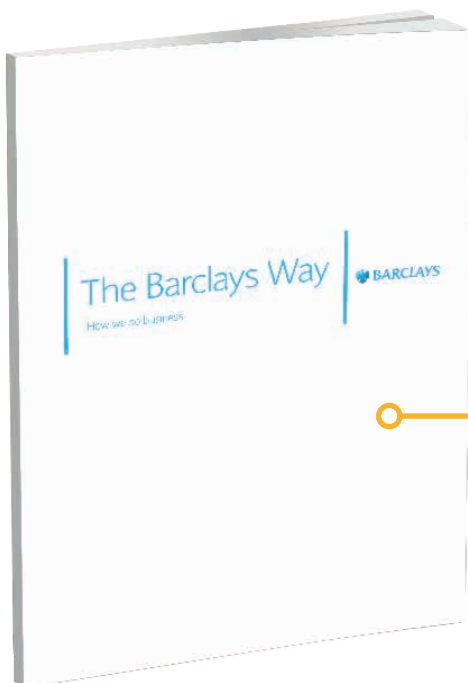
J.P. Morgan Chase Code of Conduct

<https://www.jpmorganchase.com/corporate/About-JPMC/document/code-of-conduct.pdf>

Freddie Mac Code of Conduct

http://www.freddiemac.com/governance/pdf/code_of_conduct_employees.pdf

In “The **Barclays Way**” the British finance group presents an at-a-glance framework of behaviors which sets the stage for the broader discussion.



The Barclays Way...

At a glance

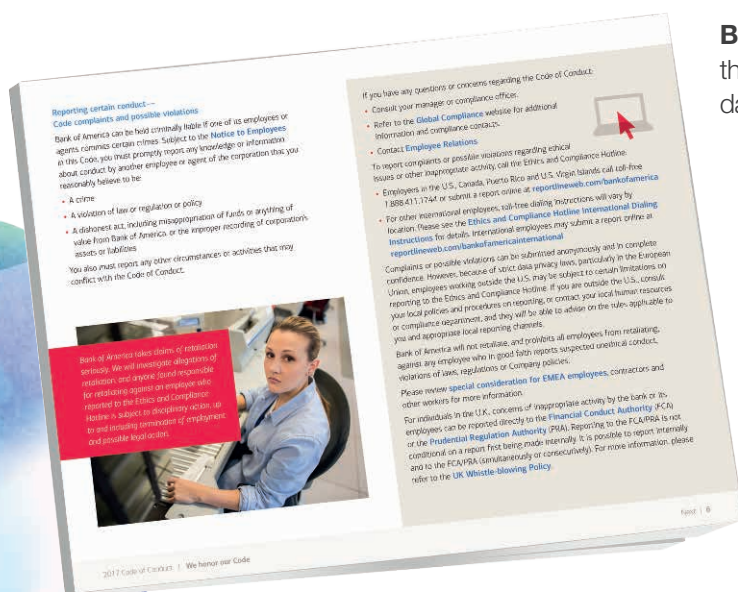
Our corporate Purpose, Values and Behaviours are fundamental to Barclays' long-term success. They represent the set of standards which govern the actions of all of us who work for the bank and against which the performance of every one of us in Barclays will be assessed and rewarded. This means that, in reviewing our performance, we will need to consider how we have demonstrated the Values and Behaviours as well as how we have performed against our other objectives.

All colleagues will self-review and receive feedback on how they have applied the Values and Behaviours in fulfilling their role as part of the formal performance review process.

Purpose, Values and Behaviours

Helping people achieve their ambitions – in the right way				
Values				
Respect	Integrity	Service	Excellence	Stewardship
We respect and value those we work with, and the contribution that they make.	We act fairly, ethically and openly in all we do.	We put our clients and customers at the centre of what we do.	We use our energy, skills and resources to deliver the best, sustainable results.	We are passionate about doing things better than we found them.
Behaviours				
<ul style="list-style-type: none"> Build trust with the colleagues and partners we work with. Seek out alternative perspectives and put our shared interests ahead of any individual or team. Collaborate proactively with colleagues across all of Barclays to get the best results. Embrace, and seek to increase, the diversity of our organisation. 	<ul style="list-style-type: none"> Show the courage to do and say the right thing. Act in private as we do in public, and honour our commitments. Challenge things we believe to be wrong and be open to challenge from others. Be accountable for failure as well as success, and not allocate blame. 	<ul style="list-style-type: none"> Take the time to understand client and customer needs, regardless of our role. Always strive to surpass client and customer expectations. Create and provide solutions for clients and customers that balance the short and long term. In serving our clients and customers, incorporate the perspectives of all our stakeholders. 	<ul style="list-style-type: none"> Aim for flawless delivery and learn from our mistakes. Take pride in both our individual work and that of our team. Actively contribute to the performance, development and engagement of our colleagues. Create the environment to attract and keep the best people who share our values. 	<ul style="list-style-type: none"> Pioneer innovative and better ways to do things. Protect and enhance our reputation and legacy at all times. Find ways to positively impact all of the communities we interact with. Value sustainable progress as much as immediate achievements.

© The Barclays Way



Bank of America uses crisp design to communicate their Code of Conduct, and presents a clear dashboard of where to take concerns or questions.

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The Barclays Way

https://www.home.barclays/content/dam/barclayspublic/docs/Citizenship/Policy-Positions/FinalTheBarclaysWay_Cropped_July%202016.pdf

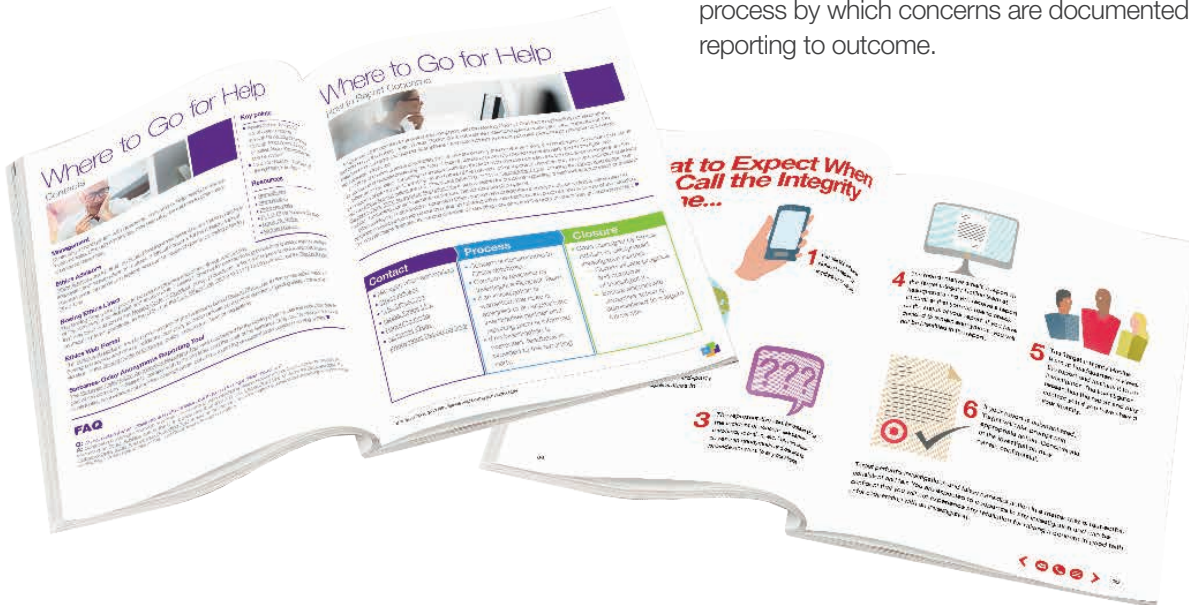
Bank of America Code of Conduct

investor.bankofamerica.com/phoenix.zhtml?c=71595&p=irol-govconduct

Prudential's Code of Conduct presents a clear "Making the Right Choices" roadmap of what is right and wrong.



Boeing's Ethical Business Conduct Guidelines and **Target's** Business Conduct Guide provide a clear process by which concerns are documented from reporting to outcome.



LEARN MORE

Prudential Code of Conduct

<https://www.prudential.com/media/managed/COC-MakingTheRightChoices.pdf>

Target Business Conduct Guide

https://corporate.target.com/_media/TargetCorp/csr/pdf/business-conduct-guide-2016.pdf

Boeing Ethical Business Conduct Guidelines

http://www.boeing.com/resources/boeingdotcom/principles/ethics_and_compliance/pdf/ethical_business_conduct_guidelines.pdf

About Argyle

We are a creative communications firm offering end-to-end, in-house execution capabilities.

Our experienced and passionate team is composed of attorneys, designers, project managers, thinkers and web developers. We collaborate together around a process that encompasses drafting, editing, designing and publishing across all digital and print channels.

We are thrilled that communications prepared by Argyle have contributed to trustful relationships between our clients and their readers, whether investors, employees or other stakeholders.

In turn, our commitment to our clients has resulted in meaningful long-term relationships with some of the most respected public and private companies in the world.

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