

Modernizing your Code of Conduct to Elevate its Impact

Updated July 2025



Labrador Transparency

Introduction

The Code of Conduct is the **backbone of a company's compliance program** and should communicate a company's ethical compass, provide employees with clear expectations for appropriate behavior at work, and contribute to good decision-making. Today, additional audiences also look to the Code of Conduct to evaluate a company's business practices and commitment to its values.

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 engaging, relatable, and easily consulted as questions arise? Or are you "ticking the box" with an outdated Code of Conduct that reads like a compliance formality and is quickly forgotten?

At Labrador, we follow and understand evolutions in corporate communications and **transform our knowledge into opportunities for our clients**. Our award-winning experience helps companies engage with their stakeholders, including employees, investors, analysts, and others, through effective corporate disclosure materials.

In this Thought Piece, we will discuss ways to structure and present your Code of Conduct so that it is **relevant** and **influential** and, in turn, more effectively supports your compliance program and improves your overall messaging.

In May 2025, we added recommendations for periodic review of your Code of Conduct and considerations for addressing DEI-related content.

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Deeper Dive

Like many compliance documents, Codes of Conduct have moved beyond simple **one-to-two** page lists of policy statements drafted to strictly meet the bare minimum requirements for which they were originally intended. They have now become **part of an overall investor suite of documents** available on the company's website. As a result, Codes of Conduct are now written for a **wide-ranging audience** that goes well beyond the company's employees.

In addition to its internal purpose, the Code of Conduct is a useful tool for investors, prospective employees, potential business partners, government agencies, and other stakeholders to take a **look into a company's culture** to learn more about how it promotes values, drives ethical behaviors, and operates with purpose.

Further, third-party organizations who provide **ratings and rankings** related to a company's environmental, social, and governance programs will evaluate a company's Code of Conduct across a number of criteria to arrive at their determination of a company's adherence to good governance and compliance practices and its commitment to a variety of ESG factors.

Looking at Codes of Conduct with an eye towards the five pillars of **transparency** will help you transform your Code of Conduct into a modern document that better engages employees and drives behavior:

- 1 Accessibility**
Readers can quickly find pertinent information in a document and information is presented in a manner that is easy to digest.
- 2 Precision**
The disclosure prioritizes thoughtful reporting and includes critical information beyond requirements of compliance that helps readers understand the company.
- 3 Availability**
Readers can easily find the document(s) they want in the format and language they need.

- 4 Clarity**
Writing is in clear, plain language so that disclosures are immediately understood by the reader.
- 5 Comparability**
Information is summarized appropriately and presented in a way that facilitates comparisons across companies and against readers' own guidelines, criteria and expectations.

What does a good and effective Code of Conduct look like?

- The Code of Conduct should be both an impactful call to ethical behaviors and an inspiring user experience to ensure “readability” created by **visually engaging design**, an easy to reference **structure**, and **clear, inclusive language**.
- The document should be **comprehensive**, explaining the **purpose** of the Code and who it applies to and detailing **expectations around various themes**, such as: anti-corruption and ethical business practices; fair labor, employment practices and work environment; employee behavior expectations; confidentiality, information security and protection of intellectual property.
- A **Table of Contents** should appear at the outset to help readers see what is covered by the Code and easily navigate to specific topics.
- It should begin with a **letter from the Chief Executive Officer or the Chief Compliance Officer** of the company setting the “Tone from the Top”.
- The document should include a section **outlining reporting procedures** and making clear that the company prohibits retaliation against those that report concerns.
- Beyond content, effective Codes of Conduct benefit from **design to support the substance** of the Code – the goal is to create a document that employees will read, understand, and remember, so that it is considered a useful resource when they have questions.
- To that end, in addition to being visually appealing, design allows for the use of **infographics** throughout the Code to make important information more digestible and to provide information that goes well beyond the letter of the law – through **decision trees, Q&A or examples**, and other ways to highlight information such as links to other policies. These aspects create interactivity and engagement with the Code that makes it more useful to employees and ideally results in better compliance outcomes.



When should a Code of Conduct be updated?

The Code of Conduct serves as the **foundation of the company's compliance program** and is a crucial tool for risk management and prevention. It should adapt to the **evolving risks and business environment** of the company.

Legal requirements, stakeholder expectations, and workplace dynamics change continuously, so the Code of Conduct must be **reviewed and updated regularly** to reflect these changes. While an annual review is advisable, it does not necessarily mean that the Code of Conduct should be updated each year. When it comes to ethics and compliance, **stability and clarity are vital for ensuring that employees fully understand and embrace the Code.**

78%

of companies update their Codes every 1 to 3 years

6 questions to determine if you should update your Code of conduct:

1. Have there been any **changes in the organization**, internal policies, or processes (e.g., merger and acquisition, leadership change, etc.)?
2. Are there any **new risks** that have emerged (e.g., exploring new markets, introducing new products, utilizing new tools, changes in the risk environment, or stakeholder feedback)?
3. Have there been significant **changes in the company's business environment** (e.g., new legal requirements, public policy changes, or shifts in stakeholder expectations)?
4. Does the Code of Conduct **align with the current culture, values and identity** of the company?
5. Is it **consistent with the company's other publications** (e.g., Annual report, Sustainability Report and related policies, Proxy Statement)?
6. Can the **readability and accessibility of the Code be improved**, and is this a suitable time to do so (considering budget and resources)?



Yes

It's important to take the time to update your Code this year.



No

There may not be a need to update it just yet. You can go through this process again next year.

Remember, Codes of conduct should reflect the current environment and culture of a company, so they should be updated every couple of years.

Focus on consistent messaging of DEI content

Companies currently navigate a complex and uncertain landscape balancing growing requirements from non-US regulatory regimes with mixed expectations of stakeholders and anti-DEI sentiment (and legal risk).

What companies should keep in mind:

- **Consistency** across company publications (including compliance documents, annual reports, sustainability reports and proxy statements) is essential. This means the language and the approach should be reviewed to match other disclosures.
- Reflecting **recent widespread changes to annual reports and proxy statements**, many companies are removing references to diversity or DEI and shifting language to inclusion and/or belonging.
- In addition to language transitions, components of previous DEI-specific sections may be removed and **integrated into other human capital management sections**.
- The focus has **shifted to overall corporate culture and fairness**, as well as workforce and talent development, employee engagement, and anti-discrimination.
- Companies should anchor their discussions on how policies related to DEI support overall corporate strategy and **drive long-term success** (for example, talent retention).
- Stakeholders including customers, employees, certain investors, and even suppliers may question a company’s reversal of its commitments, leading to **loss of trust in the company and its disclosures**.

Examples of changes to Codes of Conduct (May 2025)

Retail

- Revised title to “Inclusion and Belonging” (from DEI)
- Removed references to diversity and emphasized how inclusion and belonging serve the company’s longterm success
- Removed link towards Racial Profiling Policy
- Continued to address equal treatment in HR processes, emphasizing the importance of anti-discrimination and culture of kindness and openness
- Continued to address the topic alongside antidiscrimination

Healthcare

- Revised title to “Workplace culture” (from DEI)
- Continued to address the topic in a very short subsection
- Revised language to emphasize inclusion rather than diversity

Software

- Moved HCM-related section to the end of the document (along with other significant evolution in the document structure and topics)
- Revised title to emphasize inclusion and removed references to diversity
- Abbreviated the sub-section from two to one page
- Shifted language on topic from commitment to strategic asset
- Removed links to DEI report and website
- Kept the guidelines focused on fighting discrimination and harassment



Dive deeper: To Say or Not to Say (and How to Say It): That is the DEI question facing companies in 2025

Benchmarking

With focus on ESG in recent years, and ESG reporting frameworks calling for disclosure of ethical practices, it follows that codes of conduct are starting to be more **consistently reviewed and updated**.

63%

have a document dated and produced or updated within the last two years

Most companies include a **letter from the CEO** explaining why the policies and practices in the code of conduct are important to company culture and business, as well as setting expectations for strict compliance. This letter is often found at the beginning of the document, along with an overview of cultural values.

80%

include a letter signed by the CEO

51%

of the letters mention the importance of (i) ethics, compliance, and integrity, (ii) following the code, and (iii) reporting a concern

74%

present company values at the beginning of the document

Encouraging **reporting of ethical concerns** requires practical guidance and instructions. Fact patterns with guidance on how to manage the situation and Q&A formats are helpful. Codes of conduct should also have visual cues to easily locate key information and understand how to report a concern.

31%

include decision-making tree graphic

8%

include a graphic depicting the reporting procedure

Disclosure Examples

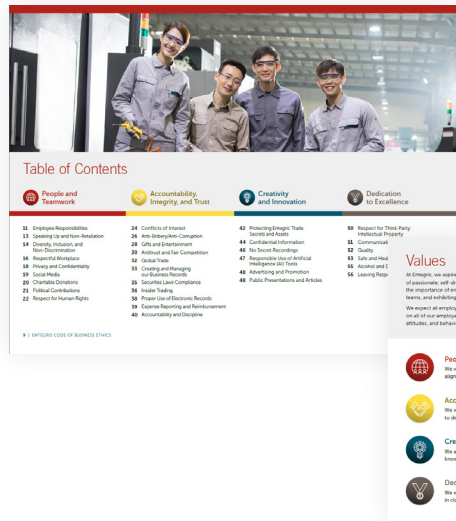
In the following pages, we include examples through the following lenses:

Anatomy of a Code of Conduct

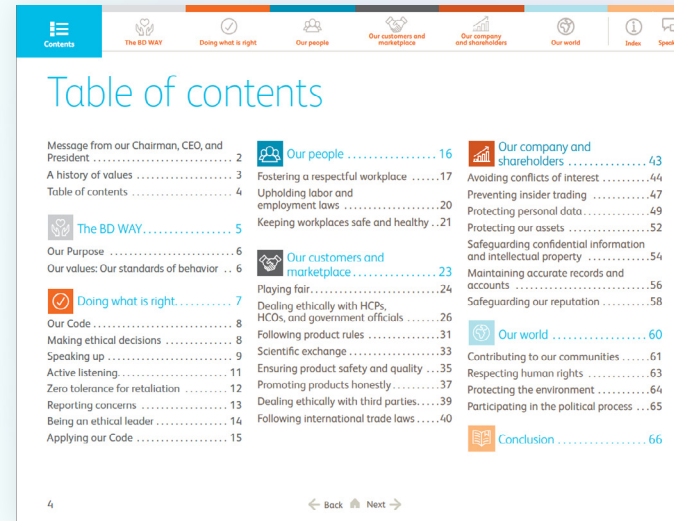
Table of Contents

The Table of Contents both demonstrates the breadth of topics covered in a modern Code of Conduct and aids the reader in navigating the document to find information.

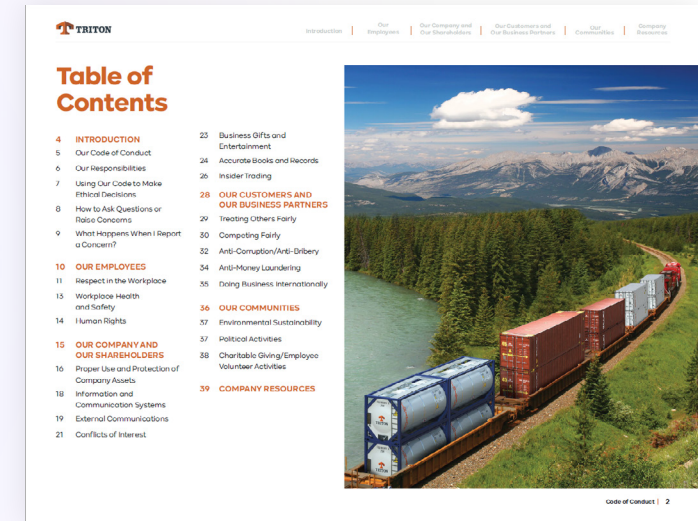
Entegris [↗](#)



Becton, Dickinson and Company [↗](#)



Triton International [↗](#)



Conviction, Ownership and “Tone From the Top”

Letter from Leadership

A letter from the Chief Executive Officer or the Chief Compliance Officer effectively sets the tone for the company’s expectations and should stress the importance of ethics, compliance, and integrity, following the Code, and speaking up to ask questions before taking actions and reporting concerns if they arise.

Proctor & Gamble

Fellow P&Gers,

P&G’s Purpose, Values and Principles are the foundation of everything we do as a company. Building and sustaining a robust business for more than 180 years depends on maintaining strong ethical, compliance, and quality standards across everything we do.

Our PVPs set a high standard for each of us. High standards are good. They require that we hold ourselves and each other accountable for results, and, equally important, for how we achieve those results.

Doing the right thing, every time, is the reason consumers trust us, partners do business with us, governments and community leaders want to associate with us, and shareholders invest in us. This trust provides us with real competitive advantage. That trust can easily be lost through a single illegal or unethical act. We simply cannot afford to do anything that causes people to lose trust in our Company, our brands, or our people. We must be fully committed to our high standards at all times.

Our Worldwide Business Conduct Manual describes our mandatory, consistent, global principles for doing the right thing. Please read it carefully. Take responsibility and accountability for following the behaviors and policies referenced in it. Bookmark the [website](#) so it is available for day-to-day consultation.

We are committed to a work environment that fosters open communication and supports employees in reporting concerns about business conduct. If you have questions or concerns about the business conduct of our Company or any individual, please talk with your manager, your Human Resources contact, your P&G legal counsel, the Company’s Ethics & Compliance Office, or contact me directly. You may also report any concerns through the Worldwide Business Conduct Helpline.

Thank you for following the Worldwide Business Conduct Manual and for doing the right thing every day, in principle and in practice, as we work together to serve consumers and customers and deliver for shareholders.



Jon R. Mueller
President and Chief Executive Officer


Thank you for doing the right thing every day.

◀ 3 of 60 ▶ | Contents | Letter from Our CEO | Our PVPs | Doing the Right Thing | Raising Questions and Concerns | Report | Stewardship | Integrity | Resources |  Worldwide Business Conduct Manual

FedEx

Letter from our President and CEO




The world relies on FedEx to deliver. We have earned this trust by connecting people and possibilities resourcefully, responsibly, and with integrity. I am proud of what our team has built over a half-century and counting, and I am energized by our mission to move FedEx and the world from now to next.

While driving what’s next means innovating and evolving to meet the needs of our customers, one thing that will never change is our insistence that ethical decision-making be first and foremost in all that we do.

FedEx has a culture of accountability, collaboration, innovation, and action. We take our pledge to always do the right thing incredibly seriously. We count on you to lead by example, to honor your commitments, and to uphold the law, our policies, and our culture values, which include taking care of each other, doing good, owning outstanding, driving business results, and creating what’s next.

The FedEx Code of Conduct is a resource for all team members and covers key legal, ethical, and behavioral expectations every FedEx team member is required to follow. We have an open-door policy at FedEx, which means any team member can speak with a manager, human resources, or a legal representative at any time for advice, guidance, or to raise concerns. You may also contact the FedEx Alert Line if you believe a violation of the law, our Code, or our policies has occurred. Our Code forbids any form of retaliation against you for reporting concerns in good faith, and we will always act quickly and diligently to review and resolve issues if they arise.

FedEx is one of the world’s most trusted and admired companies because of the dedication and drive of our team members. Thank you for delivering on our Purple Promise – to make every FedEx experience outstanding. Every day, we build upon our legacy and strengthen FedEx for the future by acting with integrity and never settling for being better when the world needs our best.


Raj Subramaniam
President and CEO
FedEx Corporation

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Entegris

Message from Joseph Colella
Senior Vice President, General Counsel, Chief Compliance Officer, and Secretary

You have a responsibility to speak up. 



Our PACE Values and this Entegris Code of Business Ethics help ensure that Entegris will continue to be a high-performance company with high-integrity. While the need for us all to conduct business ethically and in accordance with all applicable laws is beyond question, those precise responsibilities may not always be clear. This Code of Business Ethics is designed to help identify what is ethical and acceptable as we conduct business and interact with each other and our business partners.

Navigating increasingly complex business landscapes can present ethical dilemmas or compliance-related questions. If you are unsure of what to do or concerned that this Code of Business Ethics, our policies, or guidelines are being broken, you have a responsibility to speak up and I encourage you to do so. A problem cannot be resolved unless it has first been identified. The Law Department and our global compliance teams are ready to support you, so please reach out to us, a member of the Human Resources team, your line manager, or a member of the Executive Leadership Team. You can also ask questions or raise a concern anonymously via our ENTegrity hotline.

I believe that our collective commitment to our PACE Values and the principles set forth in this Code of Business Ethics makes Entegris a special place to work. The Law Department and our compliance teams are committed to supporting our global team as you deliver on this commitment.


Joseph Colella
Senior Vice President, General Counsel,
Chief Compliance Officer, and Secretary

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Purpose and Values

The most effective Codes of Conduct speak to each corporation's values and how they are upheld through the behaviors of management and employees. Codes that align purpose, values and ethical standards create a compelling message.

ConocoPhillips

Our SPIRIT Values

<p>S SAFETY No task is so important that we can't take the time to do it safely. A safe company is a successful company.</p>	<p>P PEOPLE We respect one another. We recognize that our success depends upon the capabilities and talents of our employees. We value different voices and opinions.</p>	<p>I INTEGRITY We are ethical and trustworthy in our relationships with internal and external stakeholders. We keep our promises.</p>	<p>R RESPONSIBILITY We are accountable for our actions. We care about our neighbors in the communities where we operate. We choose to make a positive impact on the world.</p>	<p>I INNOVATION We anticipate change and respond with creative solutions. We are responsive to the changing needs of the industry. We embrace learning. We are not afraid to try new things.</p>	<p>T TEAMWORK We have a 'Let's do it' attitude that inspires top performance from everyone. We encourage collaboration. We celebrate success. We win together.</p>
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ConocoPhillips headquarters, Houston, Texas

Code of Business Ethics and Conduct

Becton, Dickinson and Company

A history of values





In 1897, Maxwell W. Becton and Fairleigh S. Dickinson founded Becton, Dickinson and Company.

Since its founding over 120 years ago, BD has earned its reputation for reliability and honesty. Our customers trust our products and technologies to improve patient lives.

Our Code of Conduct helps shape our long-standing reputation so that we can continue *advancing the world of health™* for everyone who depends on us.

Our founders, Maxwell W. Becton and Fairleigh S. Dickinson



East Rutherford, New Jersey (1906), the company's first plant and corporate headquarters

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Procter & Gamble

Our Purpose, Values and Principles

Taken together, our Purpose, Values and Principles are the foundation for P&G's unique culture. Throughout our history of over 180 years, our business has grown and changed while these elements have endured, and will continue to be passed down to generations of P&G people to come.



Our Purpose
Delivers as a common cause and greater ability of transcending borders, cultures, and languages to create a positive contribution every day.

Our Values
Reflect the behaviors that shape the world that we work with each other and with our partners.

Our Principles
Articulate P&G's core beliefs and guide us in our decisions to consistently deliver on our Purpose.

Our Purpose
We will provide branded products and services of superior quality and value that improve the lives of the world's consumers, now and for generations to come. As a result, consumers will reward us with leadership sales, profit and value creation, allowing our people, our shareholders, and the communities in which we live and work to prosper.



Our Values

P&G Brands and P&G People are the foundation of P&G's success. P&G People bring the values to life or we focus on inspiring the best of the world's consumers.



- Integrity**
 - We always do the right thing and are honest and transparent with our stakeholders.
 - We respect everyone's rights and are fair to all.
 - We are ethical in all our actions and decisions.
 - We are open and honest in our communications.
- Leadership**
 - We are all leaders in our own way, taking responsibility for our actions and the actions of others.
 - We are always looking for ways to improve ourselves and our organization.
 - We are always looking for ways to inspire others.
- Ownership**
 - We are personally committed to our work and our organization.
 - We are always looking for ways to improve ourselves and our organization.
 - We are always looking for ways to inspire others.
- Passion for Winning**
 - We are always looking for ways to improve ourselves and our organization.
 - We are always looking for ways to inspire others.
- Trust**
 - We are always looking for ways to improve ourselves and our organization.
 - We are always looking for ways to inspire others.

Our Principles



- We are Customer Obsessed**
 - We believe that all our products are and must be designed to meet our customers' needs.
 - We are always looking for ways to improve ourselves and our organization.
 - We are always looking for ways to inspire others.
- We are Innovation Obsessed**
 - We believe that all our products are and must be designed to meet our customers' needs.
 - We are always looking for ways to improve ourselves and our organization.
 - We are always looking for ways to inspire others.
- We are Quality Obsessed**
 - We believe that all our products are and must be designed to meet our customers' needs.
 - We are always looking for ways to improve ourselves and our organization.
 - We are always looking for ways to inspire others.
- We are Safety Obsessed**
 - We believe that all our products are and must be designed to meet our customers' needs.
 - We are always looking for ways to improve ourselves and our organization.
 - We are always looking for ways to inspire others.
- We are Sustainability Obsessed**
 - We believe that all our products are and must be designed to meet our customers' needs.
 - We are always looking for ways to improve ourselves and our organization.
 - We are always looking for ways to inspire others.

It's how we do it that counts. Our Purpose, Values and Principles.

How to Report a Concern

Companies should include a section dedicated to how employees (and others) raise their concerns. Infographics are particularly useful in depicting the reporting procedure.

ConocoPhillips

2.2 Asking Questions and Reporting Concerns

What You Should Do
If you become aware of a situation that may involve a violation of our Code, company policy or the law, you have a responsibility to report it.

Reporting actual or suspected misconduct allows our company to investigate potential problems, stop actual misconduct and prevent future issues.

Consider This

Reporting Concerns
The ConocoPhillips Ethics HelpLine is managed by a third party. You can report concerns anonymously. When you report anonymously, your identity will be kept confidential by the third party. You will be assigned a confidential identification number that allows you to exchange information with Global Compliance & Ethics.

Voice a Concern, Ask a Question or Report a Violation

Our HelpLine is available in several languages. To seek guidance or report a concern, you may consult any of the following resources:

- Talk to your supervisor, Human Resources representative or Global Compliance & Ethics.**
- VISIT:** <https://secure.ethicspoint.com>
- CALL:** The ConocoPhillips Ethics HelpLine at 877-327-2272 (within the U.S. or Canada). If calling from outside the U.S. or Canada, use the telephone numbers based on the website.
- EMAIL:** ethics@conocophillips.com
- Contact the board of directors:** Corporate Secretary ConocoPhillips P.O. Box 4783 Houston, TX 77210-4783

Investigating Concerns
From time to time, our company may ask for your assistance in investigating a concern or issue. You have an obligation to cooperate fully and completely and provide truthful and accurate information. Any effort to hinder an investigator, such as destroying or altering documents or other evidence, providing untrue information or encouraging others to provide untrue information, violates this policy and could also result in prosecution for obstructing an investigation.

Disciplinary Action
In the event an investigator reveals that a violation of our Code, our policies or the law has occurred, our company will respond appropriately, depending on the circumstances, this may include disciplinary action, up to and including termination. Individuals may also be subject to civil or criminal prosecution if they have violated the law.

Waivers
Any waivers of our Code for our directors and executive officers may be made only by our board of directors or a designated committee of our board and will be promptly disclosed to the extent required by law.

5 | ConocoPhillips, Code of Business Ethics and Conduct

Triton International

How to Ask Questions or Raise Concerns

If you see or experience conduct that is inconsistent with the Code, or if you have a question about how to handle a situation – speak up.

The Company provides multiple resources for you to ask questions or raise concerns. Please contact any of the following resources at any time:

How to Contact the Ethics Hotline

Did you know?
The Company's Ethics Hotline is staffed by an independent third-party provider and is available 24 hours a day, seven days a week, anywhere in the world. While individuals are encouraged to identify themselves, anonymous reports are accepted where local law allows. Anonymous reports will be addressed to the extent possible based on the information provided.

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Entegris

How do I report a concern?

- Speak to your line manager
- Speak to a Human Resources representative
- Speak to a Law Department representative
- Speak to any Executive Leadership Team (ELT) or Senior Leadership Team member in your country
- Report via the ENTTEGRITY hotline

ENTTEGRITY HOTLINE

- Available 24 hours, seven days a week.
- Available in all local languages where we operate.
- Trained independent specialists will document your concerns and forward a written report to the Law Department for investigation.
- You may choose to remain anonymous.
- All reports will be taken seriously whether they are submitted anonymously or not.

Visit entegris.com/entegrity to make a report in the U.S.: (800) 461-9350
All other locations: entegris.com/entegrity for local phone numbers

WHAT TO EXPECT WHEN YOU USE THE ETHICS AND COMPLIANCE HOTLINE

- After you make a report, you will receive an access number so you can check the status and follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information in order to conduct an effective investigation. This access number will also enable you to track the resolution of the case. However, please note that, out of respect for privacy, the Company will not be able to inform you about individual disciplinary actions.
- The Company treats all reports of ethical concerns as confidentially as possible. Management shares information only with individuals who need to be asked about the issue, or who need to know about the issue. In some cases, the Company is required to share the information with legal authorities, auditors, or others.

8 | ENTTEGRIS CODE OF BUSINESS ETHICS

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. 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.

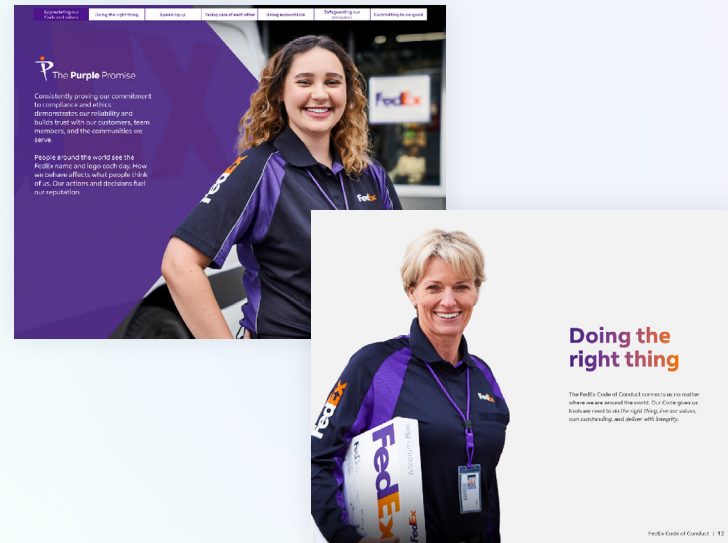
Company Brand

Anchoring the Code of Conduct to the company can be accomplished through integrating the company's tagline or other messaging from its website, matching other reporting covers, using company imagery throughout, and highlighting company products.

Triton International [↗](#)



FedEx [↗](#)



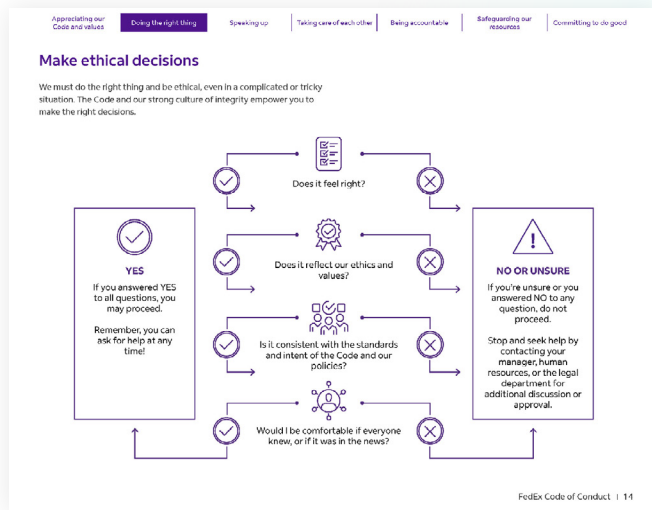
Procter & Gamble [↗](#)



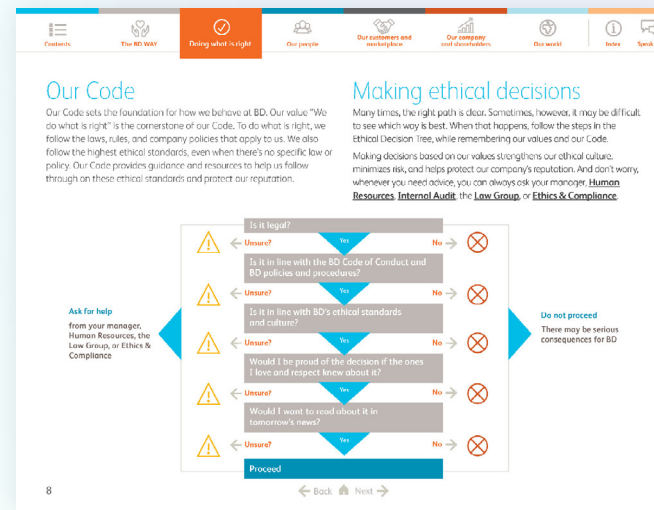
Decision Trees

Decision trees are useful in helping frame employee considerations of how to act and when to reach out to others in the organization for assistance in deciding how best to proceed in a given situation.

FedEx



Becton, Dickinson and Company



Procter & Gamble



Case Studies/Q&A

Presenting example case studies with suggestions on how to proceed helps employees understand how the Code of Conduct applies to their everyday work situations and provides them with practical solutions to address concerns that may arise.

Triton International



Social Media

Social media offers a great way to express yourself, build relationships and exchange ideas. However, social media has the potential to blur personal and professional lines, which is further complicated by laws around the world that regulate what our Company can and cannot say about itself and its business. When using social media, be mindful that posting on social media channels can result in unintended consequences that could impact both you and Triton. Therefore, only a limited number of people are authorized to speak on behalf of the Company on social media. If your position with the Company involves posting on social media sites, you must follow applicable policies and guidance from the Legal Department, the Human Resources Department and/or Communications.

Otherwise, keep in mind that how you conduct yourself on social media not only reflects on you—it can be a reflection on the Company. When posting on social media, you should never claim to be speaking on behalf of the Company or to be representing an official company position. Social media should never be used in a way that violates any Company policy or other legal obligation. Discriminatory remarks, harassment, defamatory remarks or other inappropriate or unlawful conduct will not be tolerated. Do not post confidential information about the Company, our customers or other business partners. Remember that information posted can live forever.

If you have any questions about who may communicate on a given issue, or whether a communication is appropriate, please seek guidance from Communications or any one of the resources listed under **How to Ask Questions or Raise Concerns**.

Please refer to our **Social Media Policy** for more information.

Remember

- We expect you to use good judgment when you post information online about our company, follow employees or your job.
- You are responsible for any content you publish, and you may not speak on behalf of Triton without receiving prior approval.
- Always be clear when you post online that your opinion is your own and not those of Triton.

What would you do?

Which of these social media updates is okay to post?

Sergio:
I just heard my company is about to announce its best quarter ever. Can't wait to get my bonus!

Eric:
Just landed in Shanghai. I'm looking forward to getting down to business and closing the big deal we've been working on!

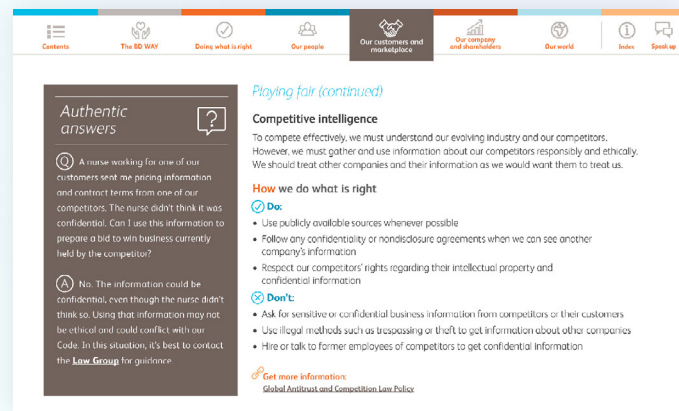
Margaret:
I had a great time volunteering with my community today. Check out the pictures on the Company's page.

The updates from Sergio and Eric give away confidential information about the Company, so they are not appropriate to post on social media.

Margaret's update is appropriate as it only references information that is already publicly available on Triton's site.

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Becton, Dickinson and Company



Authentic answers

Q: A nurse working for one of our customers sent me pricing information and contract terms from one of our competitors. The nurse didn't think it was confidential. Can I use this information to prepare a bid to win business currently held by the competitor?

A: No. The information could be confidential, even though the nurse didn't think so. Using that information may not be ethical and could conflict with our Code. In this situation, it's best to contact the **Legal Group** for guidance.

Playing fair (continued)

Competitive intelligence

To compete effectively, we must understand our evolving industry and our competitors. However, we must gather and use information about our competitors responsibly and ethically. We should treat other companies and their information as we would want them to treat us.

How we do what is right

Do:

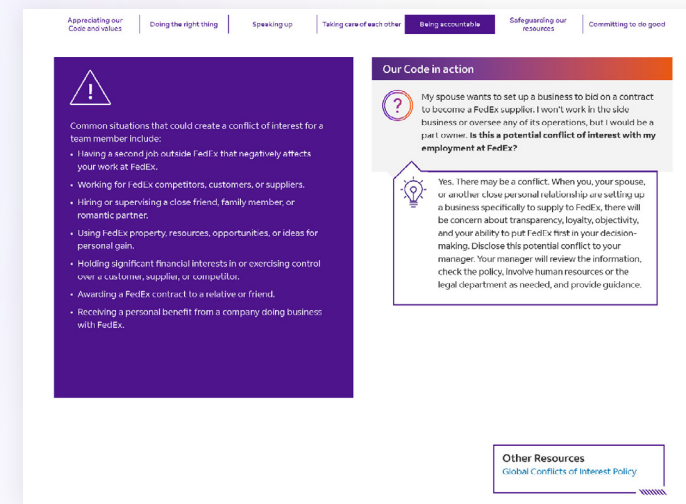
- Use publicly available sources whenever possible
- Follow any confidentiality or nondisclosure agreements when we can see another company's information
- Respect our competitors' rights regarding their intellectual property and confidential information

Don't:

- Ask for sensitive or confidential business information from competitors or their customers
- Use illegal methods such as trespassing or theft to get information about other companies
- Hire or talk to former employees of competitors to get confidential information

Get more information:
Global Antitrust and Competition Law Policy

FedEx



Our Code in action

Q: My spouse wants to set up a business to bid on a contract to become a FedEx supplier. I won't work in the side business or oversee any of its operations, but I would be a part owner. Is this a potential conflict of interest with my employment at FedEx?

A: Yes. There may be a conflict. When you, your spouse, or another close personal relationship are setting up a business specifically to supply to FedEx, there will be concern about transparency, loyalty, objectivity, and your ability to put FedEx first in your decision-making. Disclose this potential conflict to your manager. Your manager will review the information, check the policy, involve human resources or the legal department as needed, and provide guidance.

Common situations that could create a conflict of interest for a team member include:

- Having a second job outside FedEx that negatively affects your work at FedEx.
- Working for FedEx competitors, customers, or suppliers.
- Hiring or supervising a close friend, family member, or romantic partner.
- Using FedEx property, resources, opportunities, or ideas for personal gain.
- Holding significant financial interests in or exercising control over a customer, supplier, or competitor.
- Awarding a FedEx contract to a relative or friend.
- Receiving a personal benefit from a company doing business with FedEx.

Other Resources
Global Conflicts of Interest Policy

Highlighting related Policies and other Visual Aids

Infographics and visual cues can be used throughout a Code of Conduct to guide readers to additional company information and to present useful takeaways and considerations.

GE HealthCare

Acceptable Use

We use GEHC Proprietary Information and GEHC Information Resources responsibly.

THE GEHC WAY

- We must use and protect information about our Company, our customers, our employees and our suppliers in an appropriate manner.
- Similarly, we must use and protect systems, devices, and other technology used to process GEHC Proprietary Information appropriately.

WHAT ARE GEHC INFORMATION RESOURCES?


- Any systems, devices, or other technology managed and approved by GEHC to process, store or transmit GEHC Proprietary Information.
- All equipment owned or leased by GEHC, including computers, mobile devices, and tablets, and
- Other equipment, such as personally owned mobile devices, that has been approved for GEHC business use (those in the Bring Your Own Device (BYOD) program).

YOUR ROLE

- Show GEHC Proprietary Information only in GEHC information Resources.
- Only use your GEHC Identity (e.g., GEHC title or role, email address, credentials) where approved by policy and for GEHC business purposes.
- Return GEHC Information Resources when they are no longer required or have been replaced, and when you are leaving GEHC.

POLICY SPOTLIGHT

Raise any concerns about the appropriate use or protection of GEHC Proprietary Information or GEHC Information Resources at hr.healthcare.com or by contacting your manager, business ombuds, Legal Privacy, Information Security or Compliance Leader or other Open Reporting Channels.



Manage your job

HELP CORNER
S&L Acceptable Use Policy
Security Portal

ConocoPhillips

Icon Legend

- Consider This**
Things to consider before making decisions and taking action.
- Questions and Answers**
Common questions and answers on the topic presented.
- Policy Links**
Learn more about specific policies or resources that may impact your work.

Conflict of Interest Checklist

If you are concerned that you might have or appear to have a conflict of interest, ask yourself these questions before taking action:

- Will I feel obligated or make someone else feel obligated to do something?
- Am I failing to honor our SP-RT values?
- Is this, or action that will benefit me but not our company?
- Is there any chance my judgment might be compromised?
- Is there any way it could give the appearance of a conflict of interest in the eyes of others?

If you answer yes to any of these questions or are not sure how to answer any of them, contact your supervisor, Human Resources representative, Global Compliance Ethics or the Ethics Helpline.

Political and Other Appointments

- Usually Acceptable**
With management approval, employees are allowed to serve as a director of another company, give lectures, conduct seminars or publish business related articles and books.
- Sometimes Acceptable**
If an employee wishes to run for political office or has been asked to serve in an appointed position for a political entity, the employee is required to seek HR Governance, Affairs & Legal Services.
- Never Acceptable**
Volunteering for ConocoPhillips competitors, business partners, customers, contractors or suppliers constitutes a conflict of interest and is prohibited.

Entegris

TABLE OF CONTENTS | PEOPLE AND TEAMWORK | ACCOUNTABILITY, INTEGRITY AND TRUST | CREATIVITY AND INNOVATION | DEDICATION TO EXCELLENCE | **ENTEGRIS**

PEOPLE AND TEAMWORK:

Respectful Workplace

QUESTION:

While on a business trip, a colleague repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked them to stop, but they wouldn't. We weren't in the office and it was "after hours" so I wasn't sure what I should do.

ANSWER:

The type of conduct is unacceptable and should not be tolerated regardless of whether it happened during working hours or not. Tell your colleague such actions are inappropriate and must be stopped, and if they continue, you need to report the problem to your manager or a Human Resources representative.

MAKE SURE YOU:

- Help each other by speaking out when a coworker's conduct makes others uncomfortable.
- Never tolerate sexual harassment, including requests for sexual favors, or other unwelcome verbal or physical conduct of a sexual nature.
- Promote a positive attitude toward policies designed to build a safe, ethical, and professional workplace.
- Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

WATCH OUT FOR:

- Unwelcome remarks, gestures, or physical contact.
- The display of sexually explicit or offensive pictures or other materials.
- Sexual or offensive jokes or comments (explicit or by innuendo) and leering.
- Verbal abuse, threats or taunting.

TO LEARN MORE:

- Discuss any questions or concerns with your line manager or HR representative.
- HR Policies

3.3 Eliminating Workplace Harassment

Our Commitment

ConocoPhillips is committed to providing a safe and healthy work environment for all employees. We are committed to preventing and eliminating workplace harassment and discrimination. We will not tolerate any form of harassment or discrimination, including sexual harassment, based on race, ethnicity, gender, religion, age, disability, or other protected characteristics.

Recognizing Harassment

Harassment is any unwelcome or offensive conduct that is based on race, ethnicity, gender, religion, age, disability, or other protected characteristics. It includes verbal abuse, threats, or taunting, as well as physical contact or sexual advances.

Our Expectations

All employees are expected to adhere to the highest standards of conduct and to report any incidents of harassment or discrimination immediately to their supervisor or to the Human Resources representative. Failure to report such incidents may result in disciplinary action.

Consider This

Employees are encouraged to report incidents of harassment or discrimination to their supervisor or to the Human Resources representative. Failure to report such incidents may result in disciplinary action.

Policy Links

Equal Employment Opportunity (EEO)

Questions and Answers

Q: A coworker told inappropriate, offensive jokes that were "workplace safety." This keeps happening and seems to be the only person who is commenting if I speak up about my concern?

A: No, you should not be responsible for your coworker's behavior. If you are uncomfortable with the behavior, you should report it to your supervisor or to the Human Resources representative.

Q: Employees may report incidents that affect people who are not in the line of duty. How do we report for someone who is not in the line of duty?

A: Employees may report incidents that affect people who are not in the line of duty to their supervisor or to the Human Resources representative. Failure to report such incidents may result in disciplinary action.

About Labrador

Labrador exists to offer the science of transparency to corporations wishing to communicate effectively with their readers.

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 Labrador 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.

Contact

contact-us@labrador-company.com
Labrador
1737 Ellsworth Industrial Blvd NW Suite E-1
Atlanta, GA 30318
(404) 688 3584

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Labrador Transparency