

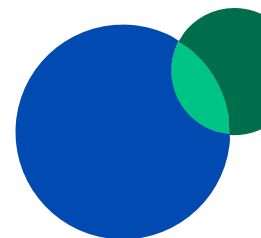


Modernizing your
Code of Conduct
to Elevate
its Impact.



LABRADOR

Transparency by design



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 Or are you “ticking the box” with an outdated Code of Conduct that reads like a compliance formality and is quickly forgotten?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.

Table of Contents

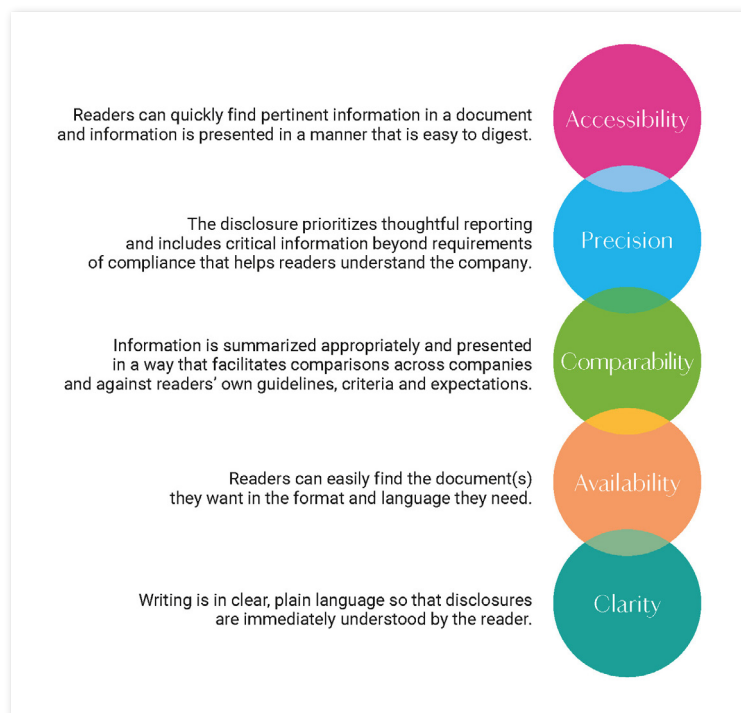
- 2** Introduction
- 3** Deeper Dive
- 5** Benchmarking
- 6** Examples

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:



What then 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.

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

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



Table of Contents

People and Teamwork

- 11 Employee Responsibilities
- 13 Speaking Up and Non-Retaliation
- 14 Diversity, Inclusion, and Non-Discrimination
- 16 Respectful Workplace
- 18 Privacy and Confidentiality
- 19 Social Media
- 20 Charitable Donations
- 21 Political Contributions
- 22 Respect for Human Rights

Accountability, Integrity, and Trust

- 24 Conflicts of Interest
- 26 Anti-Bribery/Anti-Corruption
- 28 Gifts and Entertainment
- 30 Antitrust and Fair Competition
- 32 Global Trade
- 33 Creating and Managing our Business Records
- 35 Securities Laws Compliance
- 36 Insider Trading
- 38 Proper Use of Electronic Records
- 39 Expense Reporting and Reimbursement
- 40 Accountability and Discipline

Creativity and Innovation

- 42 Protecting Entegris' Trade Secrets and Assets
- 44 Confidential Information
- 46 No Secret Recordings
- 47 Responsible Use of Artificial Intelligence (AI) Tools
- 48 Advertising and Promotion
- 48 Public Presentations and Articles

Dedication to Excellence

- 50 Respect for Third-Party Intellectual Property
- 51 Communications with External Parties
- 52 Quality
- 53 Safe and Healthy Work Environment
- 55 Alcohol and Drug-Use
- 56 Leaving Responsibly

Values

At Entegris, we aspire to be a company like no other, comprised of passionate, self-driven problem-solvers who understand the importance of embracing Entegris' core values, working in teams, and exhibiting personal drive with an innovative spirit.

We expect all employees to work to a high standard. We depend on all of our employees and associates to display actions, attitudes, and behaviors reflective of our values at all times.



People and Teamwork

We will treat people with respect and dignity in a collaborative environment that aligns the organization, achieves high performance, and rewards team success.



Accountability, Integrity, and Trust

We will act honestly and consistently with all. We will accept responsibility to deliver results and commit to openly communicate.



Creativity and Innovation

We are committed to an environment in which people are encouraged to disseminate knowledge, take risks, openly share ideas, and turn them into business opportunities.



Dedication to Excellence

We will set high standards for performance and strive to be best in class through outstanding leadership at all levels.

Becton, Dickinson and Company

 Contents		 The BD WAY	 Doing what is right	 Our people	 Our customers and marketplace	 Our company and shareholders	 Our world	 Index	 Speak up
<h2>Table of contents</h2>									
Message from our Chairman, CEO, and President 2 A history of values 3 Table of contents 4	 The BD WAY 5 Our Purpose 6 Our values: Our standards of behavior .. 6	 Doing what is right 7 Our Code 8 Making ethical decisions 8 Speaking up 9 Active listening 11 Zero tolerance for retaliation 12 Reporting concerns 13 Being an ethical leader 14 Applying our Code 15	 Our people 16 Fostering a respectful workplace 17 Upholding labor and employment laws 20 Keeping workplaces safe and healthy .. 21	 Our customers and marketplace 23 Playing fair 24 Dealing ethically with HCPs, HCOs, and government officials 26 Following product rules 31 Scientific exchange 33 Ensuring product safety and quality .. 35 Promoting products honestly 37 Dealing ethically with third parties 39 Following international trade laws 40	 Our company and shareholders 43 Avoiding conflicts of interest 44 Preventing insider trading 47 Protecting personal data 49 Protecting our assets 52 Safeguarding confidential information and intellectual property 54 Maintaining accurate records and accounts 56 Safeguarding our reputation 58	 Our world 60 Contributing to our communities 61 Respecting human rights 63 Protecting the environment 64 Participating in the political process ... 65	 Conclusion 66		

Triton International



Table of Contents

4 INTRODUCTION	23 Business Gifts and Entertainment
5 Our Code of Conduct	24 Accurate Books and Records
6 Our Responsibilities	26 Insider Trading
7 Using Our Code to Make Ethical Decisions	28 OUR CUSTOMERS AND OUR BUSINESS PARTNERS
8 How to Ask Questions or Raise Concerns	29 Treating Others Fairly
9 What Happens When I Report a Concern?	30 Competing Fairly
10 OUR EMPLOYEES	32 Anti-Corruption/Anti-Bribery
11 Respect in the Workplace	34 Anti-Money Laundering
13 Workplace Health and Safety	35 Doing Business Internationally
14 Human Rights	36 OUR COMMUNITIES
15 OUR COMPANY AND OUR SHAREHOLDERS	37 Environmental Sustainability
16 Proper Use and Protection of Company Assets	37 Political Activities
18 Information and Communication Systems	38 Charitable Giving/Employee Volunteer Activities
19 External Communications	39 COMPANY RESOURCES
21 Conflicts of Interest	



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.

Procter & 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. Moeller
President and Chief Executive Officer



JON R. MOELLER
President and
Chief Executive Officer

Thank you
for doing the
right thing
every day.



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

speaking 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.

A handwritten signature in dark ink that reads "Raj".

Raj Subramaniam
President and CEO
FedEx Corporation

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.

Joe Colella

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

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

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

PEOPLE

We respect one another. We recognize that our success depends upon the capabilities and inclusion of our employees. We value different voices and opinions.

I

INTEGRITY

We are ethical and trustworthy in our relationships with internal and external stakeholders. We keep our promises.

R

RESPONSIBILITY

We are accountable for our actions. We care about our neighbors in the communities where we operate. We strive to make a positive impact across our operations.

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.

T

TEAMWORK

We have a "can do" attitude that inspires top performance from everyone. We encourage collaboration. We celebrate success. We win together.

ConocoPhillips headquarters,
Houston, Texas



Code of Business Ethics and Conduct ConocoPhillips

Becton, Dickinson and Company

A history of values



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

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.



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

3

Contents
The BD WAY
Doing what is right
Our people
Our customers and marketplace
Our company and shareholders
Our world
Index
Speak up

The BD WAY

The BD WAY embodies who we are, what we stand for, and why we exist. It reflects the behaviors we're all expected to demonstrate every day, no matter what we do.

Our Purpose

Advancing the world of health™

Our Purpose—*advancing the world of health™*—is the basis for all that we do. It motivates us and drives the decisions we make every day, because we know our work means something.

Our values: Our standards of behavior

- ✔ We do what is right.
- ✔ We thrive on innovation and demand quality.
- ✔ We are all accountable.
- ✔ We learn and improve every day.
- ✔ We help each other be great.

6
← Back Next →

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

unifies us in a common cause and growth strategy of improving more consumers' lives in small but meaningful ways each day. It inspires P&G people to make a positive contribution every day.



Our Values

reflect the behaviors that shape the tone of how we work with each other and with our partners.



Our Principles

articulate P&G's unique approach to conducting work every day.

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

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.



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

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 as we focus on improving the lives of the world's consumers.



Integrity

- We always try to do the right thing.
- We are honest and straightforward with each other.
- We operate within the letter and spirit of the law.
- We uphold the values and principles of P&G in every action and decision.
- We are data-based and intellectually honest in advocating proposals, including recognizing risks.

Leadership

- We are all leaders in our area of responsibility, with a deep commitment to delivering leadership results.
- We have a clear vision of where we are going.
- We focus our resources to achieve leadership objectives and strategies.
- We develop the capability to deliver our strategies and eliminate organizational barriers.

Ownership

- We accept personal accountability to meet business needs, improve our systems and help others improve their effectiveness.
- We all act like owners, treating the Company's assets as our own and behaving with the Company's long-term success in mind.

Passion for Winning

- We are determined to be the best at doing what matters most.
- We have a healthy dissatisfaction with the status quo.
- We have a compelling desire to improve and to win in the marketplace.

Trust

- We respect our P&G colleagues, customers and consumers, and treat them as we want to be treated.
- We have confidence in each other's capabilities and intentions.
- We believe that people work best when there is foundation of trust.

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

Our Principles

- We Show Respect for All Individuals**
 - We believe that all individuals can and want to contribute to their fullest potential.
 - We value differences.
 - We inspire and enable people to achieve high expectations, standards and challenging goals.
 - We are honest with people about their performance.
- The Interests of the Company and the Individual Are Inseparable**
 - We believe that doing what is right for the business with integrity will lead to mutual success for both the Company and the individual. Our quest for mutual success ties us together.
 - We encourage stock ownership and ownership behavior.
- We Are Strategically Focused on Our Work**
 - We operate against clearly articulated and aligned objectives and strategies.
 - We only do work and only ask for work that adds value to the business.
 - We simplify, standardize and streamline our current work whenever possible.
- Innovation Is the Cornerstone of Our Success**
 - We place great value on big, new consumer innovations.
 - We challenge convention and reinvent the way we do business to better win in the marketplace.
- We Are Externally Focused**
 - We develop superior understanding of consumers and their needs.
 - We create and deliver products, packaging and concepts that build winning brand equities.
 - We develop close, mutually productive relationships with our customers and our suppliers.
 - We are good corporate citizens.
 - We incorporate sustainability into our products, packaging and operations.
- We Value Personal Mastery**
 - We believe it is the responsibility of all individuals to continually develop themselves and others.
 - We encourage and expect outstanding technical mastery and executional excellence.
- We Seek to Be the Best**
 - We strive to be the best in all areas of strategic importance to the Company.
 - We benchmark our performance rigorously versus the very best internally and externally.
 - We learn from both our successes and our failures.
- Mutual Interdependency Is a Way of Life**
 - We work together with confidence and trust across business units, functions, categories and geographies.
 - We take pride in results from "reaping others' ideas."
 - We build superior relationships with all the parties who contribute to fulfilling our Corporate Purpose, including our customers, suppliers, universities and governments.

[Click here to learn more about our Purpose, Values and Principles.](#)

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

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 concerns 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 listed 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 investigation, 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 investigation 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.



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.

If you find yourself in a situation where the right course of action is not clear, remember that you are not alone. Triton provides multiple resources for advice and help when you need it. By asking questions and reporting potential problems, you are helping the Company succeed. At any time, if there is any doubt about the best course of action in a particular situation, ask for assistance.

In addition, an essential part of operating with high performance and high integrity is taking action when you believe our Code, our policies, or the law may have been violated or are about to be violated. When you have a concern regarding unethical conduct or suspect a possible violation of the Code, Company policy or the law, you should report it immediately.

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



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.

How to Contact the Ethics Hotline



Visit
www.tritoncontainer.ethicspoint.com



Call
 +855-657-8028

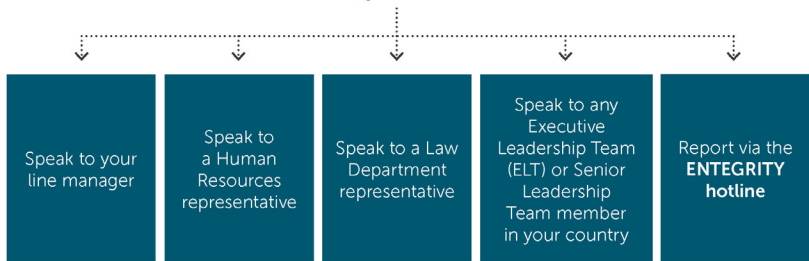


Digital Intake URL:
<https://tritoncontainer.navexone.com/>

Point your smartphone camera at this QR code, then tap the pop-up notification to go to the ethics and compliance helpline. This digital intake option is available in multiple languages.



How do I report a concern?



ENTEGRITY 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) 461-9330

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.

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

Appreciating our Code and values Doing the right thing Speaking up Taking care of each other Being accountable Safeguarding our resources Committing to do good

The Purple Promise

Consistently proving our commitment to compliance and ethics demonstrates our reliability and builds trust with our customers, team members, and the communities we serve.

People around the world see the FedEx name and logo each day. How we behave affects what people think of us. Our actions and decisions fuel our reputation.



Doing the right thing

The FedEx Code of Conduct connects us no matter where we are around the world. Our Code gives us tools we need to *do the right thing, live our values, own outstanding, and deliver with integrity.*

FedEx Code of Conduct | 12

Procter & Gamble

Responsible Sales and Marketing Practices

Our business is built on a foundation of trust. For this reason, we strive to compete vigorously and effectively, but never unlawfully or unethically. We must make only truthful statements about P&G and its products and services. All marketing claims must be substantiated and live up to their promises.

You should be familiar with the sales and marketing review procedures that apply to your work. As laws and regulations change frequently in this area, you must know the latest requirements.



We strive to compete vigorously and effectively.

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

Appreciating our Code and values | **Doing the right thing** | Speaking up | Taking care of each other | Being accountable | Safeguarding our resources | Committing to do good

Make ethical decisions

We must do the right thing and be ethical, even in a complicated or tricky situation. The Code and our strong culture of integrity empower you to make the right decisions.

YES
If you answered YES to all questions, you may proceed.
Remember, you can ask for help at any time!

NO OR UNSURE
If you're unsure or you answered NO to any question, do not proceed.
Stop and seek help by contacting your manager, human resources, or the legal department for additional discussion or approval.

Does it feel right?


Does it reflect our ethics and values?


Is it consistent with the standards and intent of the Code and our policies?


Would I be comfortable if everyone knew, or if it was in the news?

FedEx Code of Conduct | 14


Becton, Dickinson and Company



Contents



The BD WAY



Doing what is right



Our people


Our customers and marketplace


Our company and shareholders


Our world


Index


Speak up

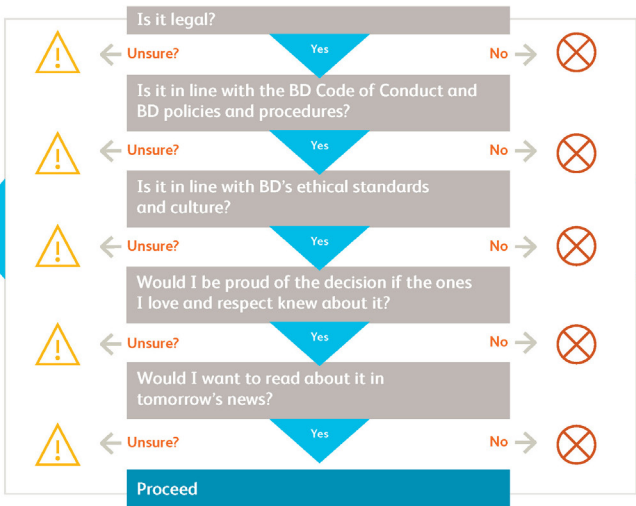
Our Code

Our Code sets the foundation for how we behave at BD. Our value “We do what is right” is the cornerstone of our Code. To do what is right, we follow the laws, rules, and company policies that apply to us. We also follow the highest ethical standards, even when there’s no specific law or policy. Our Code provides guidance and resources to help us follow through on these ethical standards and protect our reputation.

Making ethical decisions

Many times, the right path is clear. Sometimes, however, it may be difficult to see which way is best. When that happens, follow the steps in the Ethical Decision Tree, while remembering our values and our Code.

Making decisions based on our values strengthens our ethical culture, minimizes risk, and helps protect our company’s reputation. And don’t worry, whenever you need advice, you can always ask your manager, **Human Resources**, **Internal Audit**, the **Law Group**, or **Ethics & Compliance**.

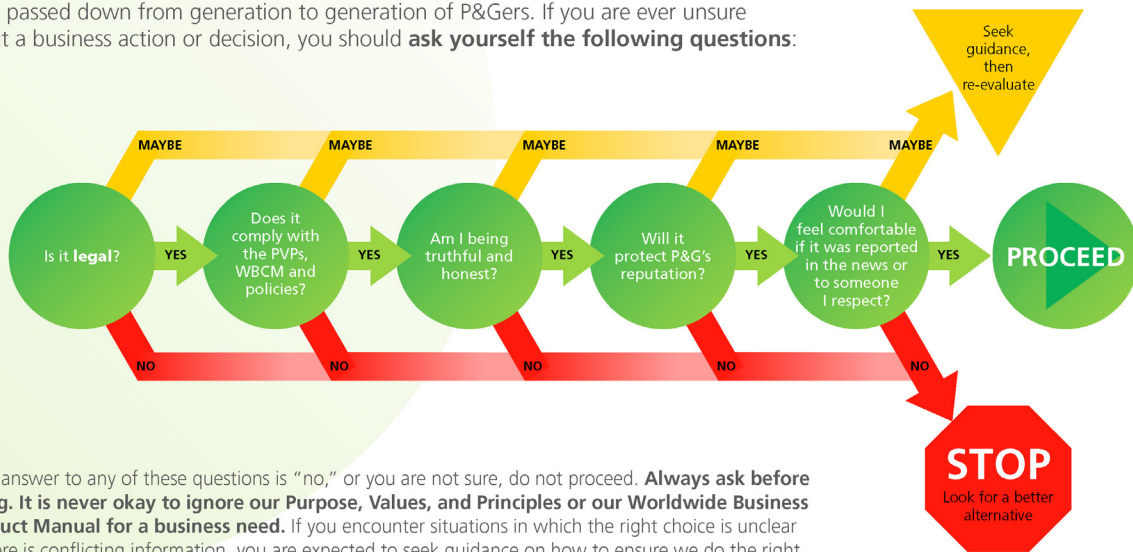


The diagram is a vertical flowchart with six decision points. Each point is a grey box with a question. Below each question are three arrows: a left arrow labeled 'Unsure?' with a yellow warning triangle icon, a downward arrow labeled 'Yes' with a blue downward-pointing triangle icon, and a right arrow labeled 'No' with a red 'X' icon. The questions are: 1. 'Is it legal?', 2. 'Is it in line with the BD Code of Conduct and BD policies and procedures?', 3. 'Is it in line with BD’s ethical standards and culture?', 4. 'Would I be proud of the decision if the ones I love and respect knew about it?', 5. 'Would I want to read about it in tomorrow’s news?'. A final blue box labeled 'Proceed' is at the bottom. A large blue arrow on the left points to the 'Unsure?' options with the text 'Ask for help from your manager, Human Resources, the Law Group, or Ethics & Compliance'. A large blue arrow on the right points to the 'No' options with the text 'Do not proceed There may be serious consequences for BD'. At the bottom of the diagram are navigation arrows: '← Back' and 'Next →'.

8

Recognizing the Right Thing to Do

At the core of P&G is the commitment to doing the right thing. This commitment has been passed down from generation to generation of P&Gers. If you are ever unsure about a business action or decision, you should **ask yourself the following questions:**



If the answer to any of these questions is “no,” or you are not sure, do not proceed. **Always ask before acting. It is never okay to ignore our Purpose, Values, and Principles or our Worldwide Business Conduct Manual for a business need.** If you encounter situations in which the right choice is unclear or there is conflicting information, you are expected to seek guidance on how to ensure we do the right thing in that situation.

You also have a duty to P&G and your fellow P&Gers to report any known or suspected violations of our WBCM, P&G policy or the law. By making such a report, you are protecting the reputation and integrity of our Company, our brands and our people.

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




Introduction | Our Employees | **Our Company and Our Shareholders** | Our Customers and Our Business Partners | Our Communities | Company Resources

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 expressing 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 internet content 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, fellow 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 opinions are 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! Looking forward to getting down to business and closing the big deal I've been working on!

Margaret:
 I had a great time volunteering with my co-workers 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.



Code of Conduct | 20

Becton, Dickinson and Company

Contents The BD WAY Doing what is right Our people **Our customers and marketplace** Our company and shareholders Our world Index Speak up

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 [Law 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

Appreciating our Code and values

Doing the right thing

Speaking up

Taking care of each other

Being accountable

Safeguarding our resources

Committing to do good



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.

Our Code in action



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?**



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.

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 (i.e. those in the Bring Your Own Device (BYOD) program).

YOUR ROLE

- Store 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.

- Limit non-business use of GEHC Information Resources, internet access, mobile data plan and email to a reasonable duration/ amount. Such use must not abuse Company time and/or resources; violate local law or any GEHC policies, standards or guidelines; or interfere with your work.
- Do not store, maintain, or back up GEHC Proprietary Information on personally owned or non-GEHC computers, mobile devices, removable media or cloud storage.
- Do not use equipment or technology banned by GEHC or a government entity.
- Do not use GEHC Information Resources for any unlawful purpose, such as accessing illegally distributed materials that are sexually explicit, or otherwise inappropriate.

•INTEGRITY IN ACTION

Q: I am away from my GEHC laptop and need to get in contact with a colleague about a project we're working on. Can I email them from my personal email account?

A: No, you may not use your personal email account to conduct GEHC business. This includes business-related communications with colleagues, customers or suppliers, as well as sending yourself any materials containing GEHC Proprietary Information. You must wait until you can regain access to your GEHC email.

PROTECT COMPANY DATA / Acceptable Use

THE SPIRIT & THE LETTER



POLICY SPOTLIGHT

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



HELP CORNER
S&L Acceptable Use Policy
Security Portal

19

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 SPIRIT Values?
- Is this an 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 wants to run for political office or has been asked to serve in an appointed position for a political entity, the employee is required to contact the Government Affairs department.



Never Acceptable

- Working for ConocoPhillips' competitors, business partners, customers, contractors or suppliers constitutes a conflict of interest and is prohibited.

3.3 Eliminating Workplace Harassment

Our Commitment

ConocoPhillips does not tolerate any form of harassment, including sexual harassment and workplace bullying. Harassment can take many forms, including verbal remarks, physical advances or visual displays, and may come from co-workers, supervisors or non-employees.

Regardless of the legal definition of harassment as it may exist in different locales, our policy prohibits any behavior that has the purpose or effect of creating an intimidating, offensive or demeaning work environment.

Our Expectations

We want our workforce to always feel comfortable voicing their concerns. If employees feel that they experienced or observed any harassing behavior, we encourage them to voice their concerns immediately so that we can take action.



Consider This

Respect One Another

We must be sure that our comments and actions are always appropriate and respectful, even when sharing feedback and opinions, as our success depends on the capabilities and inclusion of all our employees.

Reprisals or retribution against anyone who lodges a complaint in good faith will not be tolerated.

Recognizing Harassment

When behavior interferes with someone's work or creates an offensive or hostile environment, it may be harassment:

- **Nonsexual harassment** may include offensive comments, jokes or pictures related to race, religion, ethnicity, gender, age or any other category protected by law.
- **Sexual harassment** may include unwanted attention or advances, inappropriate sexual jokes, sexually suggestive comments or innuendos, touching, requests for sexual favors and inappropriate comments about another's appearance.
- **Workplace bullying** is any repeated behavior that degrades, humiliates, embarrasses or otherwise undermines an employee's performance. Other examples may include, but are not limited to, intimidation, verbal or physical aggression or coercion.



Policy Links

[Equal Employment Opportunity \(EEO\)](#)

[Workplace Violence](#)



Questions and Answers

Q. A co-worker told inappropriate, offensive jokes, but then said "I'm only kidding!" This keeps happening and I seem to be the only person upset. Am I overreacting if I speak up about my concerns?

A. No, you are not. It is important to voice your concerns. It is not only about the person's intent but how the joke was perceived. You should report this.

Q. Everyone in my department knows that a few people make sexual jokes and those people ignore us if we tell them to stop. No one has reported the behavior, but everyone knows about it. Surely, someone will eventually report it, or Human Resources will hear about it. I do not want to report it in case someone finds out it was me reporting.

A. It is important to voice your concerns. You can remain anonymous through the [Ethics HelpLine](#), but please ensure you provide enough details and information to allow a complete investigation of the matter. Also, check back on your report in case more information has been requested.

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:

This 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](#)



LABRADOR

Transparency by design

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-us@labrador-company.com

Labrador
1737 Ellsworth Industrial Blvd NW
Suite E-1
Atlanta, GA 30318
(404) 688 3584

Copyright © 2024 by Labrador

All rights reserved. No part of this publication may be reproduced, distributed, or transmitted in any form or by any means, including photocopying, recording, or other electronic or mechanical methods, without the prior written permission of the publisher, except in the case of brief quotations embodied in critical reviews and certain other noncommercial uses permitted by copyright law. For permission requests, email the publisher at contact-us@labrador-company.com.