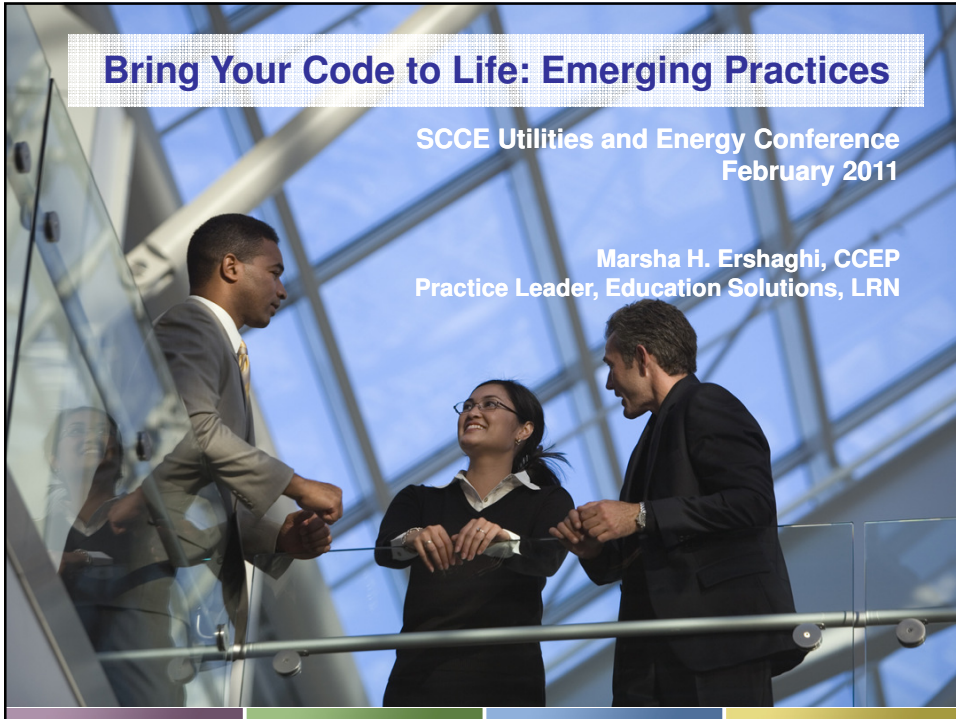


Bring Your Code to Life: Emerging Practices

SCCE Utilities and Energy Conference
February 2011

Marsha H. Ershaghi, CCEP
Practice Leader, Education Solutions, LRN



The Code of Conduct

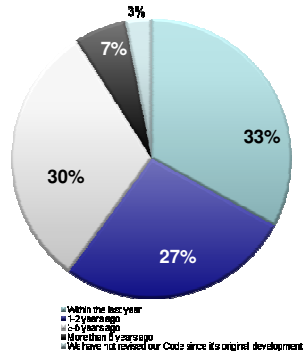
- The roadmap for the manifestation of company values in behavior
- As the central document for any Ethics and Compliance program, the Code:
 - Communicates the company's behavioral expectations
 - Assists employees with ethical judgment and decision-making
 - Facilitates dialogue about ethical issues
 - Inspires principled behavior
 - Enhances the company's reputation



Revising & Launching a New Code

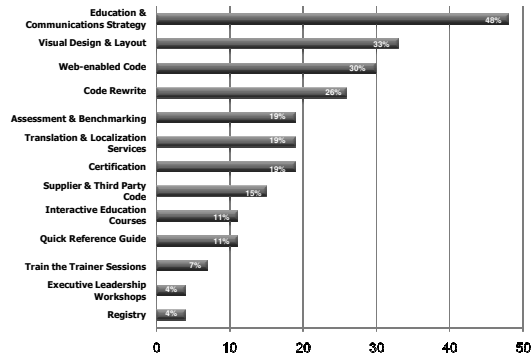
As 60% of companies revised their Code within the last two years...

When was the last time you revised your Code?
Percentage of Respondents, July 2010



...many of them now want to improve their education & communication.

Which Code service options would you find most valuable?
Percentage of Respondents, July 2010

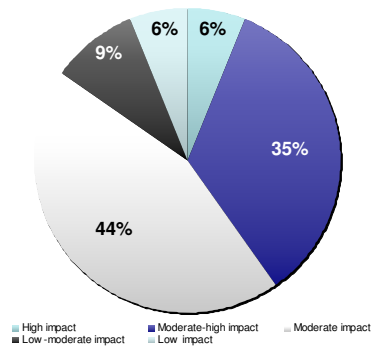


3

The Code's Impact on Employee Behavior

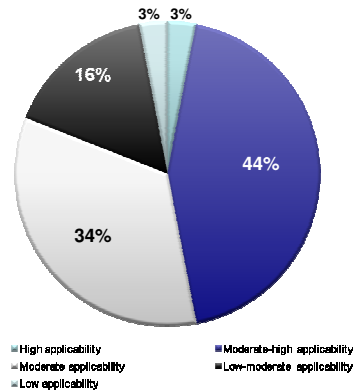
The majority of companies believe their Code has moderate to high impact on employee behavior ...

What impact do you believe that your Code & Code education has on behavior or decision-making?
Percentage of Respondents, July 2010



... while 78% believe that their Code has moderate to high applicability to day-to-day work.

To what extent do you believe your employees apply their understanding of the current Code on the job?
Percentage of Respondents, July 2010



4

The Code in Transition

Lagging Practice

Rule book focusing on compliance
Key elements of culture not reflected
Legalistic
Black and white with dense text blocks
Little or no supporting content
Rarely used or understood

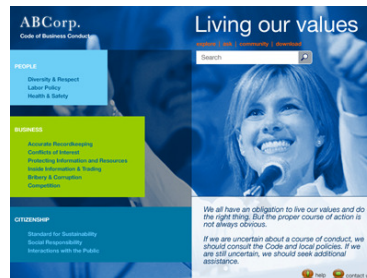
A Leading Code

Values-based guide focusing on ethical conduct beyond the rules
Reinforces mission, values, heritage, leadership priorities
Aspirational and straightforward
Contrasting visual elements with significant white space
Q&A, decision-making tools, call outs, etc. based on real-world examples
Engaging and useful reference tool

5

Elements of the Code Document: Best Practices

- Alignment with Culture
- Theme
- Structure
- Writing Style and Tone
- Substantive Provisions
- Provision Tools
- Supporting Content
- Visual Style



Code of Conduct Services

BRING YOUR CODE TO LIFE

Alignment with Culture

Best Practice

“Culture” is a company’s DNA, the sum total of its history, values, aspirations, beliefs, and endeavors. It is **the operating system that defines the way things really work.**

The Code should reflect and reinforce elements of the company’s culture including its mission, values, heritage, style and leadership priorities.

Our values

Integrity
We act honestly, ethically and honorably.

Service
We satisfy our customers every time.

Teamwork
We build relationships based on trust, respect and caring.

Innovation
We foster creativity and the development of new ideas, products and processes.

Excellence
We strive to be the best in everything we do.

Community
We act responsibly as members of the communities in which we operate.

Overview
What guides our code
Getting help

You → the workplace
You → the marketplace
You → the world

Administration of the code

Questions? see pages 13-14 for contact details.
• Start a conversation with your manager, your Regional Ethics Counsel or Human Resources.
• Contact the Business Conduct Hotline at any time (anonymous, if you choose).
• Contact [resources@lrn.com](#).



Code of Conduct Services

BRING YOUR CODE TO LIFE

Theme

Best Practice

“Theme” is a concept that runs through the Code that aligns it with the company’s culture and purpose, and reinforces the ethics and compliance program’s mission.

The theme should appropriately reflect the organization’s purpose, culture, style and focus on ethical and compliant business conduct.

LRN Inspiring Principled Performance® © 2010 LRN®
 LRN Proprietary and Confidential. Not for Redistribution.

For Employees of The Hartford



Code of Ethics and Business Conduct



© Copyright 2010 The Hartford Financial Services Group, Inc.

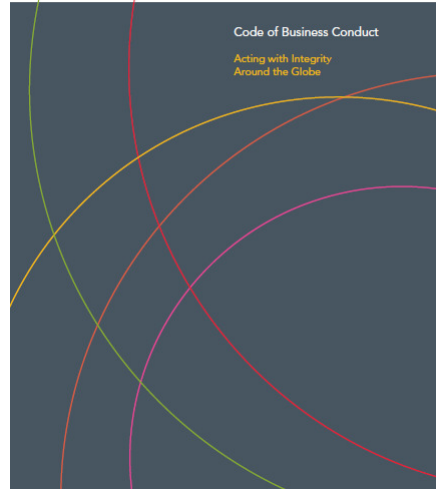
Revised as of August 23, 2010

The Hartford Code of Ethics and Business Conduct

Table of Contents

I. The Code—Our Foundation of Sustainable Trust	4
The Code is for Everyone at The Hartford 4 Raising and Reporting Compliance Concerns 5 No Retaliation 7 Enforcement and Discipline 7 Managing at The Hartford 8	
II. Trusted in Our Workplace	9
No Discrimination 9 No Harassment 10 Drugs, Alcohol, Violence 11 Working Remotely 12 Keeping Your Personal Information Safe 12 Electronic and Other Communications 13 Social Networking 15	
III. Trusted in the Marketplace	14
Conflicts of Interest 14 Outside Employment 16 Board Memberships 16 Financial Interests 17 Loans to Employees and Executive Officers 18 Corporate Opportunities 18 Personal Relationships at Work 19 Disclosing Conflicts of Interest 19 Gifts and Entertainment 20 (See also page 20) Financial Relationships 21 Competitors and Business Partners 22 Fair Competition 22 Antitrust Laws 23 Competitor Information 24 Quoting Practices 24 Competing Globally With Integrity 25 Blue or Regal Payments 25 Money Laundering and Terrorist Financing 26 Trade Sanctions Requirements 27	
IV. Trusted with Our Stakeholders	28
Information, Privacy and Security 28 Records Management 30 Reporting Financial Information 31 Insider Trading 32 Company Funds—Travel & Expenses 33 Investigations and Legal Proceedings 33 Environmental Impact 34	
V. Trusted in Our Communities	35
Government Relationships 35 Contact with Government Officials 36 Gifts & Entertainment for Government Officials 36 Pay-to-Play Restrictions 37 Participation in Political Events 38 Company Resources and Political Activities 38 Voter Registration, Education, PACs 39 Personal Political Involvement 40 Contact with the News Media 41 Contact with Investors and Analysts 41 Endorsements of Other Companies 41	
VI. Supporting Information	42
Employment at Will 42 Annual Certification Requirements 42 Waivers or Exceptions 42 Policies, Updates and Modification 43	
VII. Contact Information	44

Customer Focus • Diversity & Inclusion • Financial Discipline • Integrity • Teamwork • Winning Spirit 3



Code of Business Conduct
Contents

Acting with Integrity Around the Globe 3

- What is Expected of Everyone 4
- What is Expected of Managers 5
- What Written Approval is Required 6
- Raising Concerns 8
 - Resources
 - Anonymity and Confidentiality
 - Investigations
 - No Retaliation

Integrity in the Company 11

- Business and Financial Records 11
- Company Assets 13
 - Use of Time, Equipment and Other Assets
 - Liens
- Use of Information 16
 - Nonpublic Information
 - Insider Trading
 - Privacy

Conflicts of Interest 21

- Outside Investments 21
- Outside Employment, Speeches and Presentations 22
- Outside Service as an Officer or Director 23
- Relatives and Friends 24
- Gifts, Meals and Entertainment 26

Integrity in Dealing with Others 29

- Dealing with Governments 29
 - Anti-Bribery
 - Political Activity
 - Trade Restrictions
- Dealing with Customers, Suppliers and Consumers 34
- Dealing with Competitors 35
 - Competition Law
 - Competitive Intelligence

Addenda 39

Administration of the Code 39

- Responsibility
- Investigation of Potential Code Violations
- Discussions
- Disciplinary Actions
- Reporting of Code Decisions and Investigations
- Signature and Acknowledgment
- Waivers

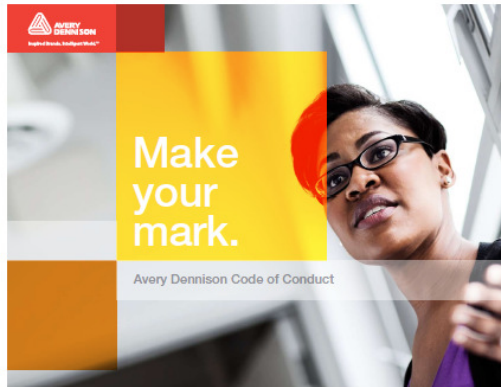
Glossary 41

Resources 42

- Ethics & Compliance Intranet Site
- Policies and Guidelines
- Ethics & Compliance Office

Question or concern? Log on to EthicalLine at www.KOethics.com





Code of Conduct Services

BRING YOUR CODE TO LIFE

Structure

Best Practice

“Structure” is the way in which the Code is organized, and the components that communicate this organization.

Structure is most visible in the Code’s table of contents and how topics are arranged under broader sections, including the order of sections, topics and supporting content. A **clear structure enables easy navigation** for readers and organizes the content in a way that conveys priorities and reinforces key messages.

Contents

Your ethical choices, intelligent and inspired, bring our vision and values to life.

<p>06 What guides our code Values, issues and leadership principles</p> <p>11 Getting help Ask a question, start a conversation, report a concern</p> <ul style="list-style-type: none"> - Contacts - Business Conduct Guided line - Online Resources <p>14 You + the workplace</p> <p>15 You</p> <ul style="list-style-type: none"> - Compliance with laws - Responsibility of employees - Responsibility of managers - Making values-based decisions - Asking questions and getting help - Reporting concerns <ul style="list-style-type: none"> - Business Conduct Guided line and other resources - Anonymity and confidentiality - Non-retaliation <p>18 Cooperation</p> <ul style="list-style-type: none"> - Equal opportunity - Harassment - Workplace violence - Environmental, health and safety - Drug-free workplace <p>20 The Company</p> <ul style="list-style-type: none"> - Business and financial records <ul style="list-style-type: none"> - Accurate records and records - Records and information management - Assets and information <ul style="list-style-type: none"> - Protection and proper use of company assets - Protection of information, intellectual property and privacy - Inside trading 	<p>26 You + the marketplace Suppliers and partners</p> <ul style="list-style-type: none"> - Conflicts of interest <ul style="list-style-type: none"> - Investments and business relationships - Gifts, meals and entertainment - Second jobs - Corporate opportunities - Supplier standards <p>30 Customers and markets</p> <ul style="list-style-type: none"> - Sales and marketing - Fair dealing in the marketplace - Competition - Competitive intelligence <p>34 You + the world Global footprint</p> <p>35 Sustainability</p> <ul style="list-style-type: none"> - Environment - Community and social responsibility <p>37 Governance</p> <ul style="list-style-type: none"> - Trade compliance - Bribery and corruption - Government inquiries and investigations <p>39 Media</p> <ul style="list-style-type: none"> - Social media - News media <p>42 Administration of the code</p> <ul style="list-style-type: none"> - Investigations and responses - Disclosure reporting - Discipline for code violations - Waivers
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Kraft Foods: Ten Rules

1. Make food that is safe to eat
2. Market responsibly
3. Treat people fairly
4. Respect the free market
5. Compete fairly
6. Respect the environment
7. Deal honestly with the government
8. Keep honest books and records
9. Never trade on inside information
10. Give Kraft Foods your complete business loyalty

The Rules

We all have to obey the law—that's a given. Also, we must follow our company policies, including those specific to our business unit, function, and location. Beyond that, this Code sets out the ten most important rules that apply company-wide.

Rule 1:

Make food that is safe to eat.

"I have complete confidence in the quality of their products."

"They knew there might be a problem but they didn't say anything about it."

Which would **you** rather hear?

We are a food company. Nothing speaks to our corporate values more than our relentless focus on food safety. Our consumers must have the confidence to use our products, and to serve them to their families, without fear of getting sick. For over a hundred years, Kraft Foods has earned that trust by making safe products.

Given our size, however, problems will inevitably arise. When something does go wrong, we respond quickly. Our Special Situations Management Team, a cross-functional team of senior managers, takes immediate steps to protect consumers. This builds our reputation and fosters consumer trust. Without that, we would risk the very existence of our business.

Code of Conduct Services

BRING YOUR CODE TO LIFE

Writing Style and Tone

Best Practice

This is the written approach and style of Code content.

Codes are intended to inspire and instruct. **The writing should be straightforward, easily understood, and free of jargon and legalese.** The tone should reflect the organization's attitude toward its intended audience. Rules should be motivated by values and purpose, and not merely dictated.

Compliance with LAWS and POLICIES

GENERAL

The actions of the Company and its directors, officers, employees, agents, consultants and other representatives must be in compliance with applicable laws, the Code and our policies. When there is doubt as to the lawfulness of any proposed activity, seek advice from the Legal Department.

Described on the following pages are summaries of certain legal obligations and policies that are particularly important to our business and reputation. Further information on any of these matters may be obtained from the Legal Department or the Director of Compliance. You may access more detailed discussion on a variety of legal and policy issues through these sources:

PRODUCT SAFETY AND QUALITY

Assessing health in relation to providing products of uncompromising quality. The philosophy "Let the customer have faith" is a foundation of our culture. We will continue to serve the needs of our customers only if we maintain this dedication to product safety and quality. Our products are subject to laws around the world relating to safety and performance. We will comply with these laws and, in some cases, may set even higher Armstrong standards for safety, durability, maintenance or appearance.

Our concern for product safety extends from product design and manufacture to products' use in homes and commercial buildings. It involves:

- the raw materials we use
- product design
- our manufacturing processes
- installation safety
- durability and toxicity once installed
- product performance
- use of recycled materials and recyclability

All products, whether manufactured by our own operations or sourced from third parties, must conform to applicable safety and quality standards, and must be approved through our Product Safety Design Review process. Each business operation must be aware of standards for products to which products will be applied. Appropriate raw materials, manufacturing processes, quality controls and testing specifications and procedures must be utilized to verify the conformance of products with applicable requirements.

Product problems must be reported to the appropriate product manager and, in serious cases affecting health and safety, to the business unit head and to the Legal Department. The business unit must take necessary measures to protect public health and safety and safeguard our customers' interests and our reputation for quality.

ENVIRONMENTAL COMPLIANCE

Our policy on the environment recognizes the importance of exercising care in the selection, use and conservation of energy and raw materials, especially natural resources, providing environmental safety in workplaces and communities, and reducing risks to the earth, its waters and atmosphere. The Company is committed to maintaining environmental accountability in our dealings with customers, employees, community residents and government in meeting an obligation to future generations.

Violations of environmental laws can be serious for Armstrong, our employees, and the communities in which we operate and live. The Company and individual employees may be liable not only for the costs of cleaning up pollution, but also for significant penalties. Violations of pollution control and waste management regulations can subject us to excessive penalties, and responsible employees can be fined or suspended.

- Your activities must strictly adhere to all applicable environmental laws and regulations, to all Company policies and procedures, and to the requirements of all environmental permits.
- Intentionally bypassing any environmental control or monitoring device is violation of any permit condition or regulation is strictly prohibited.
- The entry of information known to be false on any governmental environmental form, on any monitoring report, or in response to any request for information from any government agency is prohibited. Tampering with or diluting of samples, or otherwise providing false information about sampling, as well as intentional failure to follow permit conditions or applicable protocols for collecting, sampling, testing, analyzing, or recording environmental data is prohibited.
- If you become aware that any employee is violating any environmental law, regulation, or permit, providing false information on a form, or bypassing any environmental control or monitoring device, immediately report that information to your supervisor, your supervisor's supervisor or, as appropriate, the Director, Environment, Health and Safety, the Legal Department, or the Director of Compliance.
- Immediately report all spills above Reportable Quantity or releases in excess of permitted amount in accordance with established procedures at your facility. Other urgent circumstances involve all spills containing a release, a report to proper authorities should be made within nine minutes of discovering it. If you are uncertain as where you should report, report to the facility manager, the Director, Environment, Health and Safety or the Director of Compliance.

COMPETITION/ANTI TRUST

It is our policy to compete vigorously, but fairly, and to comply with applicable antitrust and competition laws. While these laws are not easy to summarize, in general those of the United States require that there be no agreements or understandings with our competitors that affect prices, terms or conditions of sale or unreasonably restrict competition. Antitrust laws apply to many aspects of business behavior. Any questions about permissible conduct should be raised with the Legal Department before any action is taken.

There are to be no discussions or other contacts with competitors regarding prices to be charged by Armstrong or its competitors, or the territories or markets in which products will be sold. Further, there should be no agreements with competitors as to persons or companies to whom products or services will be sold or not sold. Some laws also affect price differences between customers and the terms of agreements with suppliers. Agreements with customers, suppliers, distributors, or retailers should be reviewed with the Legal Department prior to signing, so should any arrangements resulting in price differences to competing customers.

Trade association meetings and other industry gatherings typically serve legitimate purposes, but bring together competitors who are prone to discuss matters of mutual concern. Any discussion or action that may involve prohibited conduct must be avoided, wherever the meeting. Agreements can be inferred from informal discussions or the mere exchange between competitors of information from which collusion could result. Any communication with a competitor, no matter how innocuous it may seem at the time, may later be subject to antitrust scrutiny. Employees must conduct all relations with competitors, including social activities, as if they were completely in the public view.

INTERNATIONAL BUSINESS ISSUES

Employees must comply with the laws of the countries in which they operate. Even if certain laws do not seem to be relevant to practice, or if a violation is not subject to criminal, violations are still prohibited. If you have a question about foreign activities, contact the Legal Department. You must get clearance before you risk taking questionable actions.

Employees responsible for matters affected by the following U.S. laws must be aware how they apply. Many other countries have their own laws in these matters, some of which can differ from U.S. law. Employees responsible for our international operations must be aware of all these laws and how they affect our business.

Enhance Tone, Simplify Text

THE HARTFORD CODE OF ETHICS AND BUSINESS CONDUCT

Gifts — For purposes of this policy, a "gift" is defined as "the voluntary transfer of an item by one person or enterprise to another without compensation" and can be anything of value including goods and services. The terms "gift" and "entertainment" as used in this policy, do not have the broadest meanings possible, including, but not limited to, travel, entertainment, benefits, events and any other gratuities (cash or thing of value).

Employees and their immediate family members may not give or give gifts, nor may they accept a gift from any third party beyond those courtesies deemed to be customary, reasonable and proper under the particular business circumstances.

As a general rule, accepting or giving a gift having a value in excess of USD 3.00 in any individual situation, is considered beyond what is customary, reasonable and proper. Transactions of USD 3.00 or below in nature or value are considered customary, reasonable and proper under the business circumstances that may be accepted. However, employees must know:

- Accept or give any gift of value or thing of value (such as gift certificates, meals, stock options, etc.) or
- If subjected to any situation that may involve the use of a party offering or receiving entertainment in which any law, rule, regulation or the specific ethical standards of the unit are violated.

Whenever possible, employees should obtain written approval from their supervisor or the appropriate compliance officer before accepting or giving any gift that might have a value exceeding USD 3.00. When obtaining that approval it is the prudent practice to complete a gift, each approval should be requested as soon as possible thereafter. Any supervisor granting such approval must forward a copy of the approval to the appropriate compliance officer and to maintain a log of all gift activity.

Questions regarding the appropriateness of accepting or giving gifts should be directed to the employee's supervisor and the employee's compliance officer. It is every employee's responsibility to voluntarily seek the Director's approval without the need or any request for the Director's approval. Employees must respect the privacy regarding gifts and acceptance of any business purpose and employees are prohibited from disclosing such information to others. See also the Company's policy on [Gifts, Entertainment and Business Expenses](#) in the [Business Policies](#).

Entertainment — Providing or accepting entertainment in the course of an employee's work related activities must always have a legitimate business purpose and should not only be for a legitimate business purpose, but also for the benefit of the business enterprise. Employees may accept a reasonable level of entertainment from business partners and clients. The prohibition of disclosing a business relationship to the employee's boss is a violation of the law.

The Hartford Code of Ethics and Business Conduct

Gifts and Entertainment

A "gift" is defined as "the voluntary transfer of an item by one person or enterprise to another without compensation" and can be anything of value including goods and services. The terms "gift" and "entertainment" as used in this policy, do not have the broadest meanings possible, including, but not limited to, travel, entertainment, benefits, events and any other gratuities (cash or thing of value).

Employees and their immediate family members may not give or give gifts, nor may they accept a gift from any third party beyond those courtesies deemed to be customary, reasonable and proper under the particular business circumstances.

As a general rule, accepting or giving a gift having a value in excess of USD 3.00 in any individual situation, is considered beyond what is customary, reasonable and proper.

Whenever possible, employees should obtain written approval from their supervisor or the appropriate compliance officer before accepting or giving any gift that might have a value exceeding USD 3.00. When obtaining that approval it is the prudent practice to complete a gift, each approval should be requested as soon as possible thereafter. Any supervisor granting such approval must forward a copy of the approval to the appropriate compliance officer and to maintain a log of all gift activity.

Questions regarding the appropriateness of accepting or giving gifts should be directed to the employee's supervisor and the employee's compliance officer. It is every employee's responsibility to voluntarily seek the Director's approval without the need or any request for the Director's approval. Employees must respect the privacy regarding gifts and acceptance of any business purpose and employees are prohibited from disclosing such information to others. See also the Company's policy on [Gifts, Entertainment and Business Expenses](#) in the [Business Policies](#).

Entertainment — Providing or accepting entertainment in the course of an employee's work related activities must always have a legitimate business purpose and should not only be for a legitimate business purpose, but also for the benefit of the business enterprise. Employees may accept a reasonable level of entertainment from business partners and clients. The prohibition of disclosing a business relationship to the employee's boss is a violation of the law.

Provision Topics

Best Practice

The Code’s provision topics indicate the range of issues with ethics and compliance implications for the organization. In general, it is preferable to address more topics briefly than fewer topics extensively because doing so alerts readers to the breadth of issues with ethics and compliance implications; such Codes can then easily reference additional policies or guidelines for further information.

Moreover, lengthy sections are less likely to be read.

The Hartford Code of Ethics and Business Conduct

Insider Trading

Buying or selling securities based on inside information is illegal and dishonest and erodes trust in the marketplace—that’s why we never do it. Our insider trading policy and pre-clearance rules are on [L3.com](#), but the main principle is simple—you and your immediate family members are prohibited from disclosing or using any confidential information gained in the course of your employment for buying or selling securities. You must follow the Company’s established insider trading pre-clearance rules. If you have any questions about buying or selling The Hartford securities, you should contact the Director of Corporate Law.

Also, it’s important to protect and control the distribution of material nonpublic and other sensitive information. Failure to control this kind of information could not only undermine the hard work of our Company leaders in communicating with the markets, but in certain circumstances it could also violate the federal securities laws. You must follow Company guidelines for communications in any form, including publication on [L3.com](#), e-mail and voice mail distributions, slide-show presentations, conference calls, incorporation in marketing materials, media interviews or otherwise.

You must obtain prior approval from both Media Relations and Corporate Law to disseminate materials containing information about the Company’s capital, financial results, ratings, or strategy, whether or not previously published, to an internal audience of greater than 25 individuals or to ANY external audience. In addition, you must seek legal advice before issuing, even internally, any communications containing material nonpublic information, including previously unpublished information about the financial condition or results of the Company or any of its businesses, financial outlooks or business plans, to anyone other than the team preparing it.

The process for obtaining legal review is coordinated through Media Relations. Please continue to coordinate this review through your communications support team, and remember to allow sufficient advance time for these and other required reviews.

Key Definition

Material nonpublic information includes or comprises any information that an investor might consider relevant to making a decision to invest in The Hartford’s stock, if you have any doubts about this legal standard, please arrange legal review with Media Relations.

Contacts

Senior Vice President & Director of Corporate Law
David Robinson
(860) 547-2776

Vice President, Media Relations
Shannon Wilkins
(860) 547-5624

Policies

[Insider Trading Policies](#)

You + the workplace
provides references

- Policy 1.1 [Lead and Ethical Conduct](#)
- Policy 1.4 [Information Protection, Security and Confidentiality](#)
- Policy 2.1 [Workplace Conduct and Workplace Policy](#)
- Policy 2.2 [Business Relationships](#)
- Policy 2.3 [Social Media](#)
- Policy 2.4 [Business Travel](#)
- Policy 2.5 [Business Expenses](#)
- Policy 2.6 [Business Entertainment](#)
- Policy 2.7 [Business Gifts](#)
- Policy 2.8 [Business Entertainment and Gifts](#)
- Policy 2.9 [Business Entertainment and Gifts](#)
- Policy 2.10 [Business Entertainment and Gifts](#)
- Policy 2.11 [Business Entertainment and Gifts](#)
- Policy 2.12 [Business Entertainment and Gifts](#)
- Policy 2.13 [Business Entertainment and Gifts](#)
- Policy 2.14 [Business Entertainment and Gifts](#)
- Policy 2.15 [Business Entertainment and Gifts](#)
- Policy 2.16 [Business Entertainment and Gifts](#)
- Policy 2.17 [Business Entertainment and Gifts](#)
- Policy 2.18 [Business Entertainment and Gifts](#)
- Policy 2.19 [Business Entertainment and Gifts](#)
- Policy 2.20 [Business Entertainment and Gifts](#)
- Policy 2.21 [Business Entertainment and Gifts](#)

We also take care with the confidential information of other companies. We treat this information with the same respect we give our own and use it only for the purpose for which it was disclosed to us. We don't want to possess, use or benefit from other companies' confidential information without their authorization. That includes confidential information that an employee obtained through prior employment or activities outside their scope of work.

Insider trading
Insider trading is illegal. It distorts the market and damages trust. We do not use or disclose financial or other confidential information, or disclose it to others, for the purpose of trading in stocks or other securities. Refer to [Insider Trading \(Policy 7.10\)](#) for more information.

Overview: What guides our code | **You + the workplace** | Administration of the code | Getting help: You + the world

Disclaimer: See page 124 for general advice.
- Read a disclaimer with the package your Regional Sales Contract or Service Agreement.
- Contact the Business Contract Sales list of any local representatives if you choose.
- [Business contract sales](#).

Code of Conduct | 24

Code of Conduct Services

BRING YOUR CODE TO LIFE

Provision Tools

Best Practice

“Provision Tools” are content that support the understanding and applicability of individual Code provisions. These tools help to clarify, explain and otherwise strengthen understanding of the content and its relevance to the organization’s culture and operations.

© 2010 LRN®
LRN Proprietary and Confidential. Not for Redistribution.

The Hartford Code of Ethics and Business Conduct

II. Trusted In Our Workplace

We all need to feel that The Hartford is a safe and secure place to work. For that reason, The Hartford strives to maintain a secure work environment free from discrimination, harassment, drugs and violence.

We must always:

- Treat each other fairly and with respect
- Keep a safe, secure and healthy workplace
- Encourage a trusting and open workplace
- Protect and value personal information
- Communicate thoughtfully and respectfully

No Discrimination

We want to hire and keep the best people. And we make all employment decisions based only on merit – without discrimination based on personal differences such as race, color, gender, religion, age, national origin, disability, veteran status, sexual orientation, gender identity, marital status, ancestry or citizenship status. This promise applies to all aspects of employee relations, including recruitment, hiring, compensation, training, promotion and termination.

Key Point

Every employee must help keep our workplace free from discrimination, harassment, violence, drugs and alcohol, and unsafe conditions. Only by maintaining a safe, fair and appropriate workplace can we continue to attract top-quality employees and improve our future business performance.

Policies

[Equal Employment Opportunity](#)
[Prohibiting Charge of Discrimination](#)

The Hartford Code of Ethics and Business Conduct

No Harassment

We do not tolerate any form of workplace harassment, regardless of whether someone is an employee or non-employee or whether he or she is on The Hartford's premises, working off-site or at an off-site business function.

Examples of harassing and intimidating behavior include:

- Unwanted physical contact
- Displaying offensive material or telling offensive jokes
- Threats of termination or loss of opportunities based on race, color, gender, religion, age, national origin, disability, veteran status, sexual orientation, gender identity, marital status, ancestry or citizenship status
- Conduct of a sexual, racial or other nature that interferes with someone's work performance or creates an intimidating, hostile or offensive work environment
- Threatened or actual violence

You should immediately report any acts of harassment. The Hartford will protect from retaliation anyone who in good faith reports harassment or who provides information in an investigation.

If you are a manager, you should report immediately any harassment complaints or allegations to your Human Resources representative, the HR Service Center or any other reporting contacts listed on page 5.

Q&A

Q: Can a sexually oriented joke be considered a form of harassment?

A: Yes, especially if it is unwelcome. Jokes, cartoons, photographs, videos, e-mails or any other sexually related material should not be discussed, displayed or distributed anywhere in the workplace. You do not know who it might offend. What is funny or harmless to one person may be intimidating or offensive to another. Therefore, such material must be kept out of the workplace.

Contact

The HR Service Center
 (877) HR-ALL-WORLD
 (877) 472-8947

Policies

[Harassment-Free Workplace Policy](#)
[Prohibiting Charge of Harassment](#)

Customer Focus • Diversity & Inclusion • Financial Discipline • Integrity • Teamwork • Winning Spirit 9

Customer Focus • Diversity & Inclusion • Financial Discipline • Integrity • Teamwork • Winning Spirit 10

Policies Reference

You + the workplace policies reference

- Policy 1-1 [Asset and Ethical Conduct](#)
- Policy 1-4 [Confidentiality, Health and Safety](#)
- Policy 2-1 [Code of Conduct, Compliance and Business Ethics](#)
- Policy 2-6 [Conflicts of Interest](#)
- Policy 2-8 [Conflicts of Interest](#)
- Policy 2-7 [Conflicts of Interest](#)
- Policy 2-9 [Conflicts of Interest](#)
- Policy 2-11 [Disclosure of Conflicting Information](#)
- Policy 2-16 [Disclosure of Conflicting Information](#)
- Policy 2-17 [Disclosure of Conflicting Information](#)
- Policy 2-18 [Disclosure of Conflicting Information](#)
- Policy 2-19 [Disclosure of Conflicting Information](#)
- Policy 2-20 [Disclosure of Conflicting Information](#)
- Policy 2-21 [Disclosure of Conflicting Information](#)
- Policy 2-22 [Disclosure of Conflicting Information](#)
- Policy 2-23 [Disclosure of Conflicting Information](#)
- Policy 2-24 [Disclosure of Conflicting Information](#)
- Policy 2-25 [Disclosure of Conflicting Information](#)
- Policy 2-26 [Disclosure of Conflicting Information](#)
- Policy 2-27 [Disclosure of Conflicting Information](#)
- Policy 2-28 [Disclosure of Conflicting Information](#)
- Policy 2-29 [Disclosure of Conflicting Information](#)
- Policy 2-30 [Disclosure of Conflicting Information](#)
- Policy 2-31 [Disclosure of Conflicting Information](#)

We also take care with the confidential information of other companies. We treat this information with the same respect we give our own and use it only for the purpose for which it was disclosed to us. We don't want to possess, use or benefit from other companies' confidential information without their authorization. That includes confidential information that an employee obtained through prior employment or activities outside their scope of work.

Insider trading

Insider trading is illegal. It distorts the market and damages trust. We do not use or disclose financial or other confidential information, or disclose it to others, for the purpose of trading in stocks or other securities. Refer to [Insider Trading \(Policy 7-10\)](#) for more information.

Overview

What guides our code

Getting help

You + the workplace

You + the marketplace

You + the world

Administration of the code

Resources (see pages 12-16 for contact details)

- Speak to your supervisor or your manager, your Regional Ethics Counselor or Human Resources
- Contact the Business Conduct Ombudsman at any time (anonymously, if you choose)
- Contact your local office

Q&A

You + the workplace

About you

What happens when someone violates our Code?
The Company investigates and, whenever possible, helps employees correct their actions and learn from the experience. Depending on the nature of the violation, employees may be subject to disciplinary action up to and including termination of employment.

I didn't mean to violate the Code, but I discovered that I did. Will I get in trouble if I tell my manager?
Most mistakes can be prevented by showing time and attention to reading and applying the Code. Ethics and corporate values. But mistakes happen, and it's always better to tell your manager as soon as you realize it so the matter can be addressed.

It'd like to consult the Law Department on a decision, but aren't their other things done?
The way to involve the Law Department early on, if you are considering a corporate transaction, is to alert up the process if the Law Department is involved in the contractual stage.

What should I do if a local law seems inconsistent with the Code?
Do your best to understand whether it's also, contact the Law Department.

About your coworkers

If being up my ethics course may, I will also share production, and we may miss our deadline. I don't have my supervisor to be reported to. What do I do?
Deadlines are important, but health and safety should come first. We're all committed to that priority. The Company always wants you to bring up concerns immediately, even if that means slowing production, missing a deadline or losing a business opportunity.

I think my coworker might have a drug problem. If I report him, will he be fired?
Not necessarily. Avery Decision recognizes that alcohol and drug dependency are treatable conditions. Human Resources and our Employee Assistance Program can help employees overcome alcohol. But employees who use or are under the influence of drugs or alcohol at work may be subject to discipline in order to keep everyone at Avery Decision safe.

About the company

What exactly is "nonpublic information"?
Confidential information is any information that the Company hasn't disclosed or made available to the public. It includes about inventions, contracts, pricing, new products, prototypes, proposals, financial data, business plans and employee lists. A few examples. Others include corporate earnings reports and forecasts that haven't been released to the public, research and development results or information about our relationships with other companies.

Does Avery Decision need my company email or phone to be monitored?
The Company does not, as a rule, monitor your business communications. But Avery Decision may monitor the information that passes through Company systems, including e-mail, internet, internal telephony, internal social media communications and computer hard drives, as permitted by local law.

Code of Conduct | 25

Code of Conduct Services

BRING YOUR CODE TO LIFE

Supporting Content

Best Practice

“Supporting Content” is content that does not communicate specific compliance requirements, but supports the overall Code’s purpose and reinforces understanding of its provisions. These high-level provisions on **“how to think about conduct”** often are the most meaningful and relevant parts of the Code.

© 2010 LRN®
LRN Proprietary and Confidential. Not for Redistribution.

Acting with Integrity Around the Globe

What Is Expected of Everyone

Comply with the Code and the Law

Understand the Code. Comply with the Code and the law wherever you are. Use good judgment and avoid even the appearance of improper behavior.

Consider Your Actions, and Ask for Guidance

If ever in doubt about a course of conduct, ask yourself:

- Is it consistent with the Code?
- Is it ethical?
- Is it legal?
- Will it reflect well on me and the Company?
- Would I want to read about it in the newspaper?

If the answer is "No" to any of these questions, don't do it.

If you are still uncertain, ask for guidance. The Code tries to capture many of the situations that employees will encounter, but cannot address every circumstance. You can seek help from any of the following:

- Your management
- Company legal counsel or senior finance personnel supporting your business
- Your Local Ethics Officer
- The Ethics & Compliance Office

Or you can use [EthicsLine](#). EthicsLine is available at [www.KOethics.com](#), or by calling toll-free using the access codes that can be found on the website.

Note on the Glossary

Throughout the Code, certain words and phrases appear in red. These terms are defined in the Glossary at the end of this document.

4

What Is Expected of Managers

Promote a Culture of Ethics and Compliance

Managers should at all times model appropriate conduct. As a manager, you should:

- Ensure that the people you supervise understand their responsibilities under the Code and other Company policies.
- Take opportunities to discuss the Code and reinforce the importance of ethics and compliance with employees.
- Create an environment where employees feel comfortable raising concerns.
- Consider conduct in relation to the Code and other Company policies when evaluating employees.
- Never encourage or direct employees to achieve business results at the expense of ethical conduct or compliance with the Code or the law.
- Always act to stop violations of the Code or the law by those you supervise.

Respond to Questions and Concerns

If approached with a question or concern related to the Code, listen carefully and give the employee your complete attention. Ask for clarification and additional information. Answer any questions if you can, but do not feel that you must give an immediate response. Seek help if you need it. If an employee raises a concern that may require investigation under the Code, contact Company legal counsel, senior finance personnel or the Ethics & Compliance Office.

Question or concern? Log on to [EthicsLine](#) at [www.KOethics.com](#)



5

Acting with Integrity Around the Globe

Raising Concerns

We all have an obligation to uphold the ethical standards of The Coca-Cola Company. If you observe behavior that concerns you, or that may represent a violation of our Code, raise the issue promptly. Doing so will allow the Company an opportunity to deal with the issue and correct it, ideally before it becomes a violation of law or a risk to health, safety or the Company's reputation.

Resources

You have several options for raising issues and concerns. You can contact any of the following:

- Your management
- Company legal counsel or senior finance personnel supporting your business
- In the case of potential criminal conduct, Strategic Security in Atlanta
- Your Local Ethics Officer
- The Ethics & Compliance Office

You also can use [EthicsLine](#) at [www.KOethics.com](#) or make a toll-free call using the access code for your country available on the website.

- EthicsLine reports can be made anonymously.
- EthicsLine is available 24 hours a day, seven days a week.
- Translators are available.
- EthicsLine reports are forwarded to the Ethics & Compliance Office.

European Union Exception

Many European Union countries limit the types of reports that EthicsLine can accept. Specific limitations are described on the Ethics & Compliance intranet site and on the EthicsLine website.

8

Anonymity and Confidentiality

When you make a report to the Ethics & Compliance Office or through EthicsLine, you may choose to remain anonymous, although you are encouraged to identify yourself to facilitate communication. If you make your identity known, the Ethics & Compliance Office and investigators will take every reasonable precaution to keep your identity confidential, consistent with conducting a thorough and fair investigation. To help maintain confidentiality, avoid discussing these issues, or any investigation, with other employees. Because we strive to maintain strict confidentiality in all investigations, we may not be able to inform you of the outcome of an investigation.

Investigations

The Company takes all reports of possible misconduct seriously. We will investigate the matter confidentially, make a determination whether the Code or the law has been violated, and take appropriate corrective action. If you become involved in a Code investigation, cooperate fully and answer all questions completely and honestly.

No Retaliation

The Company values the help of employees who identify potential problems that the Company needs to address. Any retaliation against an employee who raises an issue honestly is a violation of the Code. That an employee has raised a concern honestly or participated in an investigation, cannot be the basis for any adverse employment action, including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination.

If you work with someone who has raised a concern or provided information in an investigation, you should continue to treat the person with courtesy and respect. If you believe someone has retaliated against you, report the matter to the Ethics & Compliance Office or use EthicsLine.

Making False Accusations

The Company will protect any employee who raises a concern honestly, but it is a violation of the Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with a Code investigation. Honest reporting does not mean that you have to be right when you raise a concern; you just have to believe that the information you are providing is accurate.

Question or concern? Log on to [EthicsLine](#) at [www.KOethics.com](#)



9

Visual Style

Best Practice

“Visual Style” is the look and feel of the final document. The **Code’s visual style is the first element that a reader notices**, and can significantly affect employees’ willingness to read and consult the Code. Simple black and white documents with large blocks of text can be off-putting, and are unlikely to draw the reader in. Attractive text and layout, with significant white space and contrasting visual elements, are far more likely to hold the reader’s attention. Images can reinforce messaging and enhance attractiveness.

The Hartford Code of Ethics and Business Conduct

II. Trusted in Our Workplace

We all need to feel that The Hartford is a safe and secure place to work. For that reason, The Hartford strives to maintain a secure work environment free from discrimination, harassment, drugs and violence.

We must always:

- Treat each other fairly and with respect
- Keep a safe, secure and healthy workplace
- Encourage a trusting and open workplace
- Protect and value personal information
- Communicate thoughtfully and respectfully

No Discrimination

We want to hire and keep the best people. And we make all employment decisions based only on merit—without discrimination based on personal differences such as race, color, gender, religion, age, national origin, disability, veteran status, sexual orientation, gender identity, marital status, ancestry or citizenship status. This promise applies to all aspects of employee relations, including recruitment, hiring, compensation, training, promotion and termination.

Key Point

Every employee must help keep our workplace free from discrimination, harassment, violence, drugs and alcohol, and unsafe conditions. Only by maintaining a safe, fair and appropriate workplace can we continue to attract top-quality employees and improve our future business performance.

Policies

[Equal Employment Opportunity](#)
[Reporting Charges of Discrimination](#)

The standard of integrity we set for our organization means that we aim to follow the letter and the spirit of the law.

You + the workplace



You + the workplace

We know that making ethical choices isn't always easy. That's why the Company offers the support, training and resources to help you feel confident in your choices. Your manager, the Business Conduct GuideLine, Regional Ethics Counsels, the Law Department, Human Resources and other sources of help are always available.

You

Compliance with laws

Compliance is the foundation. Each of us needs to understand — and comply with — the laws, regulations and policies that apply to our particular jobs. But often, compliance is just the beginning. Sometimes, it's possible to follow the letter of the law but still not do what's right. That's contrary to our philosophy. At Avery Dennison, we strive for the highest ethical standards.

Responsibility of employees

The standard of integrity we set for our organization means that we aim to follow the letter and the spirit of the law. Gaining the knowledge and understanding to do that takes time and energy. Consider it a critical investment in your own success and the future of the Company.

<p>Overview What guides our code Getting help</p>	<p>You + the workplace You + the workplace You + the world</p>	<p>Administration of the code</p>	<p>Resources see page 12-13 for contact details.</p> <ul style="list-style-type: none"> • Start a conversation with your manager, your Regional Ethics Counsel or Human Resources • Contact the Business Conduct GuideLine at any time • Contact us online
------------------------------------------------------------------	-------------------------------------------------------------------------------	------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------





Code of Conduct Services
BRING YOUR CODE TO LIFE

Education

Best Practice

Your “Education” strategy will be the most critical component of bringing the Code of Conduct to Life **translating the Code into ‘action’**. The Code Education Program will bring all the elements to life and drive engagement, adoption and understanding. The educational experiences can impact the learner’s understanding of how to interpret policy, apply guidelines in ethical decision making.

Create a blended education strategy that offer **choices** to map learners to relevant educational treatments. Enable **frequent** educational experiences, informal and formal, live and online, leader led and peer led. Allow learners to make connections by keeping the issues at the top of their mind. Keep the program fresh, build a strategic communications strategy and reinforce the messages through all channels.

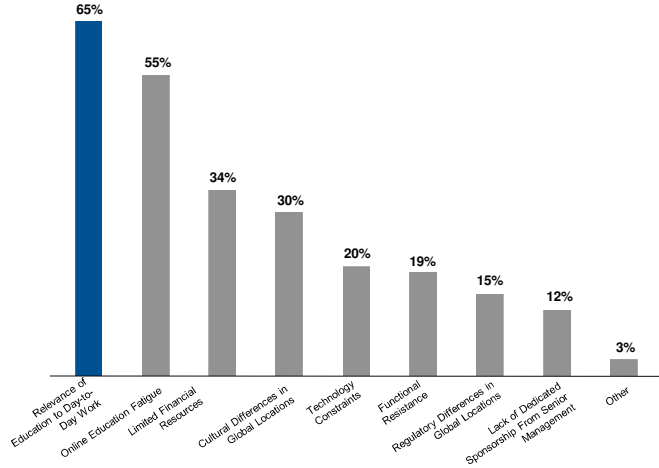
Lack of Relevance to Work is the Biggest Compliance Education Challenge

Key Insight:

E&C leaders continue to struggle with making education applicable to daily work and online education fatigue. In comparison, **last year's** participants indicated the following challenges:

- Lack of business unit support (**56%**)
- Making education relevant (41%)**
- Low employee engagement (**33%**)
- Lack of education and/or certification materials in key risks (**30%**)
- Online training fatigue (**28%**)

Q: What are the biggest challenges you face when providing E&C education?



© 2010 LRN®
LRN Proprietary and Confidential. Not for Redistribution.



What Enables Good Learning?

Discussion ● Practice & Application ● Collaboration ● Evaluation

How do you **Enable** Learning?

- How do learners learn?
- Why do learners learn?
- How do you make sure that learning sticks?

- Three core learning styles:
 - Auditory
 - Visual
 - Kinesthetic

VISUAL
SEE IT 

AUDITORY
HEAR IT 

KINESTHETIC
DO IT 

Learners gravitate towards learning styles that fit their comfort, style.

LRN Inspiring Principled PerformanceSM



Know Your Audience

LRN Inspiring Principled PerformanceSM

42

Future Workforce: Start Planning Now

In 5 years, Millennials will make up 47% of the workforce



Gen Y or Millennials (1980-2000)

- **Technology** has transformed how this generation works, collaborates, seeks knowledge.
- Expect **immediate feedback** with interactions
- Seek **stimulation & engagement**
- Expect **integrated media** (streaming video, epistemic gaming)
- Expect organization to address **different learning styles**
- Expect **brief & succinct learning**, short attention span
- Seek to be a part of the learning experience
 - Self Directed or
 - Peer to Peer (social collaboration)
- Desire to **self-manage learning**

* Gen Y seek leaders to **coach rather than manage**

LRN Inspiring Principled PerformanceSM

Personal is Memorable

- Learning experiences that establish strong **emotional connections** with the subject matter enable change in thinking and behavior.
- Knowledge-based education, supports general awareness and targeted risk-based training.
- Organizations are extending the online training with live discussion forums – driving emotional connections with the subject matter.
- Rubber hits the road in discussion forums.
 - Abstract becomes real
 - Emotional & personal discussions
 - Learner personalizes issue



LRN Inspiring Principled PerformanceSM

44



Bring Your Code to Life
Interactive Learning

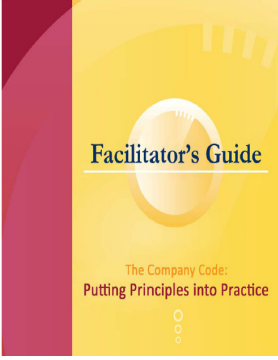
LRN *Inspiring Principled PerformanceSM*

45

Operationalize your Code: Promote Interactive Learning

Enhance approach to online Code of Conduct education

- Integrate language translation
- Localize and be sensitive to cultural nuances
- Solicit feedback using surveys and internal blogs
- Infuse more fun – make ethics cool!
- Looking at crafting Leadership and mid-Management series about winning hearts and minds
- Refresh training content and approach often – keep it fresh
- Continue to talk **with** employees, using every vehicle possible





Case by Case summary and guiding discussion points

Discussion Exercise

After viewing/listening to a scenario (either for a single topic or several topics, depending on the format being used), each team will spend 5–10 minutes talking about the issues in a discussion exercise. If required, each person on the team should assume the role of a character in the scenario. The team should then address the questions that you will pose to them. The questions will differ for each scenario.

If the teams have trouble getting their discussion started, you can help them by using the content summary for each topic. This summary will also guide you in the larger group discussion of key learning points.

Each scenario has one or more icons associated with it. Use the following legend to know what they mean.

Icon	Description
	This scenario is available in a video format. Please play the scenario using the Code of Conduct online course link.
	This scenario is not available in a video format and needs to be narrated to the audience. Please read the scenario carefully, and then narrate it to the audience, either as is or in your own words.

Content Summary by Topic Guide

Topic 1—“A Culture of Respect: Values and Ethics”

Scenario synopsis: Michael, a purchasing manager, is working at his desk when his colleague Annette stops by to hand him some documents. Annette notices a computer sitting on Michael's desk. She asks Michael if the purchase had burnt a hole in his pocket, to which he replies that he didn't have to spend a penny on it. One of the company's suppliers, Alida, sent the computer as a baby shower gift for Michael's soon-to-be-born baby. Annette raises an eyebrow to this and points out to Michael that it isn't appropriate to accept expensive gifts from suppliers as it could create a conflict of interest. Michael declines that one little gift is not going to affect how he processes bids. Besides, he doesn't even make the final decisions.

Discussion exercise: After viewing the scenario, each team will spend 5–10 minutes discussing the issues. Participants from each team should assume the role of a character in the scenario. The team should then address these questions:


- o Should Michael report the gift and risk having to give it back?
- o Michael knows the gift won't affect his business decisions. Should he simply keep the gift?
- o Should Alida have offered Michael the computer? Does the action imply a potential conflict of interest?

Group discussion: After the teams discuss the questions, ask one representative from each team to share the team's responses to the questions.

Summary: Following the group discussion, you should summarize the key learning points. The central lesson in this topic is that ethical choices come in all shapes and sizes, and sometimes there's no law or specific policy to guide the choice for us.


Key learning points: Use these points for your summary at the end of the session.

- o Compliance means following the law and company policies—playing by the rules, as they say.
- o Ethics, on the other hand, takes you beyond the law. It means doing the right thing even when the law or company policy allows something less.
- o When you face an ethical dilemma, first stop and determine the facts. Then, ask yourself these four questions about the action you're considering:
 - o Will it break any laws or company policies?
 - o Could it appear wrong?
 - o Will anyone be unfairly harmed by my decision?
 - o Will anyone feel that I owe them something in return—or they owe me something—if I take this action?
- o Always do the right thing and maintain the company's ethics. Your integrity is part of the company's brand—its “good name.” You could say—and once it's tarnished, it can take decades to repair.



Explore Episodic Learning: Webisodes

A series of online episodic modules, which include videos, web-enabled user accessed content, and testing




Embed more Interactive Testing


Rollover choices
Immediate feedback

Global trends can dramatically change how businesses operate and what society expects of them. A company that doesn't pick up on trends risks losing its position in the marketplace.

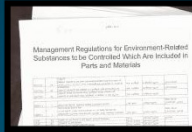
Click each item below to review the global trends we discussed in this episode.



Stakeholder Influence



Resource Scarcity



Government Regulations and Industry Standards

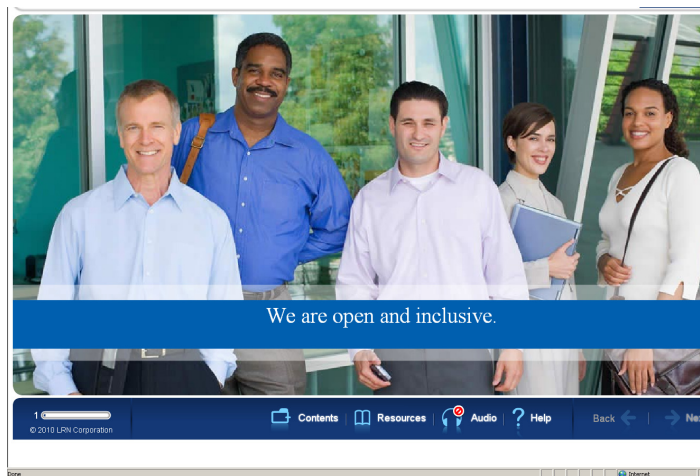
Stakeholder Influence

A stakeholder can be anyone, or any group, who can affect or be affected by an organization's activities. Any stakeholder with an opinion and access to the Internet can impact a company's reputation and make a difference in how it operates.

Do you know what your stakeholder's concerns are?
Does your company engage with your stakeholders on a regular basis?
What might you learn from them that would help you achieve your objectives?

Click on each one to find out more.

Freshen your Online Code of Conduct Education





Leadership can Engage the Enterprise

Leadership should exemplify the behaviors they want to see in others:

- Enlist leadership early
- Define Leader's role and expectations for leading with learning
- Coach: How do leaders have the conversation?

Lead from the Middle:

- Manager as learner is a powerful influence on the employees
- Securing manager buy-in and support for delivery = critical step
- Managerial delivery promotes greater cultural adoption of Compliance education

Cascade Approach:

Board & Sr. Executives > Sr. Leadership > Middle Management > Enterprise > Agents & Contractors

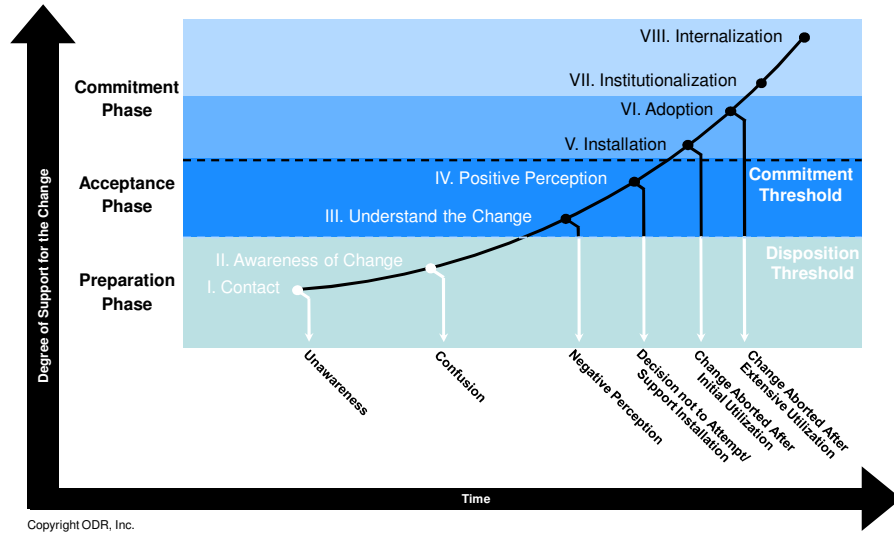
Source: 2009 ASTD State of Industry Report
(American Society of Training and Development)



Strategic Communications

Cascading the Code of Conduct Worldwide

Design Cascade to Help People Commit

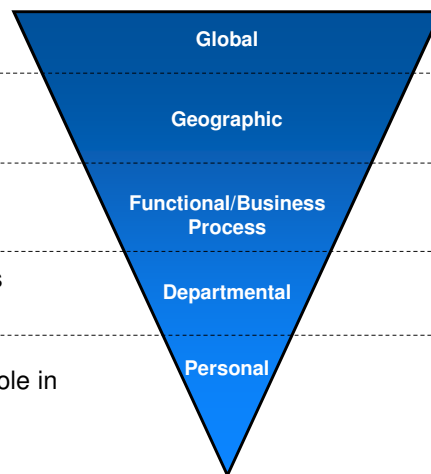


Copyright ODR, Inc.

57

Commit to a Purposeful Approach

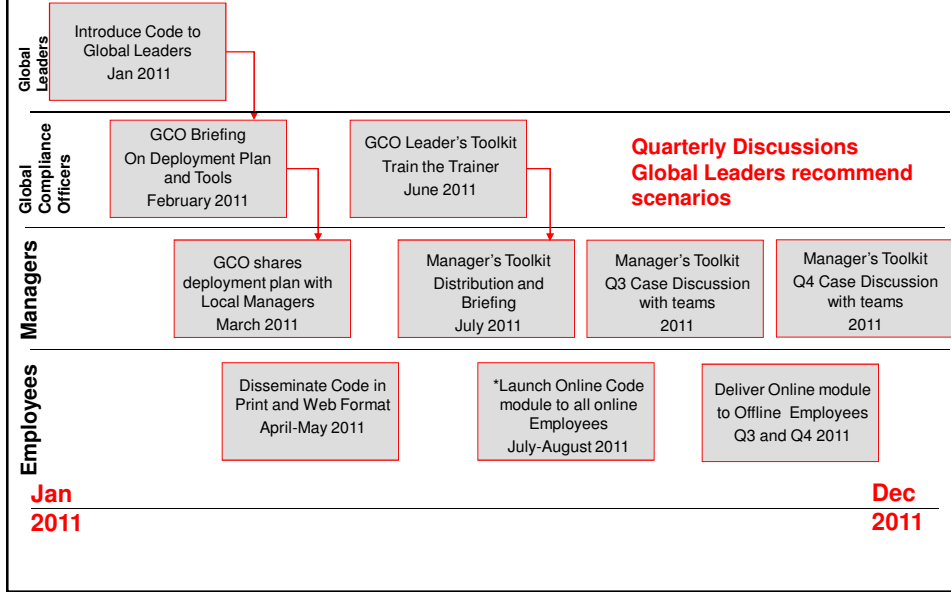
- Set overall global program context in line with corporate messaging
- Provide geographical level information for implementation
- Provide further information from a functional perspective
- Address department-specific issues and information
- Connect to personal situation and role in the change



Communications need to be coordinated across teams and functions to avoid unintended "implied" messages. In the absence of information, employees will create their own.

58

Sample Cascade Plan Code of Conduct



Develop a tri-fold overview brochure as a companion piece

Celebrate Your Company DNA

Avoiding insider trading

Protecting the environment

Q&A Tools & Resources

Our commitment to our people

Diversity, equal opportunity and respect

Additional responsibilities for leaders

Highlight Core Values

© 2010 LRN®
LRN Proprietary and Confidential. Not for Redistribution.



Bring Your Code to Life Live Simulation

Program Flow

- Your team is seated at your table
- Watch scenario together
- Discuss questions (see table handouts)
- Large group discussion: comments, conclusions, recommendations

Theme: Navigating the Grey

- As a leader, what was Alan's responsibility around direction and clarity?
- What was Alan's responsibility to model behaviors and values?
- If Janet came to YOU with concerns about Alan's guidance, what would you advise?

Theme: Speaking Up

- As a leader, how can you encourage or facilitate employee comfort levels in speaking up?
- Are there risks in encouraging employees to speak up?
- What are the paths within your organization for an employee to raise a concern?

Theme: Relating to your workplace

- As a leader at your organization, what type of guidance would you provide to your employee in a situation like this?
- How would you handle a conversation with your employee?
- What can you do, in your role as a leader, to prevent issues like this from happening in the first place?

Questions and Answers



© 2010 LRN®
LRN Proprietary and Confidential. Not for Redistribution.