

Code of Conduct & Ethics Policy

Version: 2025-01

Company: [NMT]

1. Purpose and Scope of the Policy

This Code of Conduct & Ethics Policy defines expectations for ethical behavior across [Company Name]. It applies to all employees, contractors, and third-party representatives and aims to promote integrity, respect, and accountability in all business dealings.

2. Core Values and Principles

2.1 Integrity

We act honestly and transparently.

Example: Reporting a billing error that benefits the company.

2.2 Respect

We treat colleagues, clients, and partners with dignity.

Example: Encouraging diverse viewpoints in team discussions.

2.3 Fairness

We ensure equitable treatment in all interactions.

Example: Promotion decisions based solely on merit.

2.4 Compliance with Laws

We adhere to all applicable laws and regulatory standards.

Example: Completing required training on regional data protection laws.

3. Workplace Behavior Standards

3.1 Professional Conduct

- Maintain professionalism in all interactions.
- Dress appropriately for role and environment.
- Use respectful language in communications.

3.2 Anti-Discrimination

Discrimination based on protected characteristics is prohibited.

Scenario: Reporting derogatory comments regarding someone's ethnicity.

3.3 Anti-Harassment

Harassment, including sexual harassment, is not tolerated.

Example: Unwanted advances or inappropriate jokes.

3.4 Manager Checklist

- Ensure understanding of behavior standards.
 - Promote diversity and inclusion awareness.
 - Encourage open dialogue.
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4. Conflicts of Interest

Employees must avoid personal interests that interfere with company duties.

4.1 Examples of Conflicts

- Hiring or supervising close relatives.
- Financial interests in a competitor.

4.2 Disclosure Process

Report potential conflicts to a manager or HR.

4.3 Prohibited Activities

- Accepting non-nominal gifts from clients or suppliers.
- Outside employment that affects job performance.

4.4 Manager Checklist

- Review team circumstances regularly.
 - Reinforce transparency.
 - Clarify gift acceptance rules.
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5. Confidentiality and Data Protection Obligations

5.1 Confidential Information

Employees must safeguard company, client, and colleague information.

5.2 Data Handling

- Follow approved processes for storing and sharing data.
- Do not disclose proprietary information without authorization.

Example: Verifying the legitimacy of external requests before sharing client data.

5.3 Manager Checklist

- Conduct ongoing data protection training.
 - Ensure secure data practices.
 - Monitor compliance.
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6. Use of Company Assets and IT Resources

6.1 Acceptable Use

- Use company email and systems for work-related purposes.
- Access online resources relevant to job duties.

6.2 Prohibited Use

- Installing unauthorized software.
- Using company assets for personal profit.

6.3 Manager Checklist

- Monitor asset usage.
 - Provide guidance on acceptable use.
 - Address misuse promptly.
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7. Anti-Bribery and Anti-Corruption Rules

We enforce a strict zero-tolerance policy on bribery and corruption.

7.1 Key Principles

- Never offer or accept bribes.
- Maintain transparency in financial dealings.

Example: Refusing payments offered to influence decision-making.

7.2 Manager Checklist

- Provide compliance training.
- Include anti-corruption clauses in contracts.
- Monitor adherence.

8. Interactions with Clients, Partners, and Suppliers

8.1 Ethical Guidelines

- Treat partners with respect and fairness.
- Avoid behavior that could harm the company's reputation.

Scenario: Reporting a supplier offering incentives in exchange for contracts.

8.2 Manager Checklist

- Review client and supplier engagements.
- Ensure ethical contract terms.
- Build trustworthy partnerships.

9. Reporting Concerns and Whistleblower Protections

9.1 Reporting Channels

- Direct reporting to managers or HR.
- Anonymous reporting via designated whistleblower hotline.

9.2 Protections

Employees reporting issues in good faith are protected from retaliation.

9.3 Manager Checklist

- Encourage transparency.
- Ensure all employees know reporting methods.
- Address reports promptly.

10. Disciplinary Measures for Violations

Violations may result in disciplinary action based on severity.

10.1 Possible Consequences

- Verbal/written warnings
- Suspension or demotion
- Termination for serious breaches

10.2 Manager Checklist

- Document violations.
 - Apply disciplinary actions consistently.
 - Support employee improvement efforts.
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11. Appendix

11.1 Glossary

- **Confidential Information:** Sensitive data requiring protection.
- **Conflict of Interest:** Personal interests interfering with professional duties.

11.2 Related Policies

- Anti-Harassment Policy
- Data Protection Policy
- Whistleblower Policy

11.3 FAQ

What should I do if I witness unethical behavior?

Report it to your manager or HR.

Can I accept gifts from clients?

Only nominal gifts; anything else must be reported.

What if I'm unsure about a conflict of interest?

Disclose it to your manager or HR.

How is confidentiality maintained?

By following data handling procedures.

What protections exist for whistleblowers?

Protection from retaliation when reporting in good faith.

What constitutes harassment?

Any unwanted conduct creating a hostile environment.

Are violations disciplined?

Yes—measures range from warnings to termination.

This Code of Conduct & Ethics Policy establishes clear expectations for ethical conduct, helping maintain a respectful, compliant, and accountable workplace environment.