Ethics Policy

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| Policy Area | IT Policy Library |
| Approved Date | December 31, 20XX |
| Approved By | Policy Committee |
| Effective Date | January 1, 20XX |
| Current Version | 1.0 |

# I. Overview

ABC Company is committed to transparency, trust, and integrity. Our values and practices are the principles that guide our organization.

# II. Purpose

This policy provides guidelines for Staff to help them conduct their actions in accordance with ABC Company's primary values and ethical standards.

# III. Scope

This policy applies to all ABC Company Staff.

# IV. Policy

ABC Company’s Executive Management shall be responsible for overseeing the development and implementation of a Code of Ethics. The Code of Ethics shall describe appropriate behavior principles when conducting organization business.

Accountability. Staff shall acknowledge and accept personal accountability for the ethical quality of their decisions and actions. Staff shall operate in the best interests of the organization and shall not take advantage of their position to personally benefit from organization activities.

Compliance. Staff shall use sound judgment, common sense, and comply with all relevant laws, regulations, and ABC Company policies when conducting business.

Conduct. Staff shall operate in an honest, ethical, and fair approach when dealing and communicating with others. Staff shall not deliberately make untrue, misleading, deceptive, or fraudulent statements. In addition, Staff shall not manipulate, conceal, abuse, or misrepresent information or material facts. Staff shall protect the image and reputation of the organization by ensuring conduct that builds respect and by taking actions necessary to correct or prevent inappropriate conduct of others.

Confidentiality. Staff shall be made aware of confidentiality requirements and take actions to ensure ABC Company complies with such requirements. Information shall only be disclosed to authorized Staff on a need to know basis. Unauthorized disclosure of confidential information is prohibited. In the event of a breach of confidentiality, Staff shall immediately inform their immediate supervisor of any actions that create, or could create a breach of confidentiality.

Conflicts. Staff shall operate in the best interests of the Company and shall not engage in activities or actions that create a conflict of interest. Staff shall immediately inform their immediate supervisor of any actions that create, or could create, a conflict of interest.

Culture. ABC Company values ethical behavior. Ethical values and behaviors shall be consistently and systemically supported by ABC Company Executive Management. Staff shall respect the privacy, rights, and interests of others. Staff shall be courteous and treat others with respect and dignity regardless of sex, race, or national origin.

Records. Staff shall ensure that transactions and actions are accurately captured and reported for all relevant business activities. Such records shall be retained per ABC Company’s Data Retention Policy.

Violations. Any Staff member who becomes aware of a violation, or suspected violation, of this policy, or applicable laws or regulations, should immediately report the matter to their immediate supervisor.

# V. Enforcement

Any Staff member found to have violated this policy may be subject to disciplinary action, up to and including termination.

# VI. Distribution

This policy is to be distributed to all ABC Company Staff.

**Policy History**

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| Version | Date | Description | Approved By |
| 1.0 | 1/1/20XX | Initial policy release |  |
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**References:**

COBIT EDM01.01-03, APO01.01-02, APO01.05, APO01.09, MEA01.02, MEA03.01

GDPR Article 23

HIPAA 164.308(a)(1)(ii)(C), 164.308(a)(1)(ii)(D), 164.308(a)(8), 164.316(a)

ISO 27001 4.1, 5.1-2, 6.1.1, 6.1.3, 9.3

NIST SP 800-37 2.1, 3.3, 3.5

NIST SP 800-53 2.1, 3.2, 3.3, 3.9, 3.17

NIST Cybersecurity Framework ID.AM-5, ID.BE-3, ID.GV-1, ID.GV-3

PCI 3.1, 12.10