

POLICY: Proper Use of Assets

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AS-OF-DATE: 01/01/2011

PURPOSE:

This Code of Conduct reflects the company's commitment to ensure that its employees and those with special business relationships with the company - hereafter included in the references to employee - will maintain an ethical and lawful conduct in all company affairs.

SCOPE:

This policy applies to all company operating units and entities with direct, indirect, or implied access to information assets owned by or entrusted to the company.

RESPONSIBILITY:

All employees must adhere to this Code of Conduct. Employees in leadership positions are responsible for ensuring that their subordinates understand and comply with this Code of Conduct. Violations of the Code of Conduct could lead to disciplinary actions up to and including termination. If this code fails to provide specific information needed to make an informed decision that may have legal or ethical implications, the company human resource manager or legal representative should be contacted.

AUTHOR:

Name: **Title/Role:** **Phone:**
Email: **Location (Site):**

APPROVING AUTHORITY:

Name: **Title/Role:** **Phone:**
Email: **Location (Site):**

REQUIREMENT:

All employees must adhere to this Code of Conduct. Employees in leadership positions are responsible for ensuring that their subordinates understand and comply with this Code of Conduct. Violations of the Code of Conduct could lead to disciplinary actions up to and including termination. If this code fails to provide specific information needed to make an informed decision that may have legal or ethical implications, the company human resource manager or legal representative should be contacted.

STANDARD:

EMPLOYEE RELATIONS - The organization is an equal opportunity employer that values diversity in the workforce. We recognize that a diverse workforce provides unique benefits and opportunities including creativity, variety in approaches in problem solving (e.g., perspectives, experiences, ideas, etc.), and the ability to work effectively in the ever-changing global community.

Race, age, gender, religion, national origin, or any other form of discrimination will not be tolerated in the company, the conduct of company business, or any other company activity. The company will select and place employees, or others with special working relationships (e.g., contractors, consultants, teaming partners, etc.) based on their qualifications and ability to perform the desired task.

This also applies to all company personnel actions including, but not limited to, recruitment, hiring, training, education, promotion, compensation, benefits, separation, social and recreational activities, administration, and access and use of company facilities and resources.

SEXUAL HARASSMENT AND OTHER MALICIOUS BEHAVIOR - Sexual harassment and other malicious behavior will not be tolerated in the workplace or while on assignment conducting company business. This applies to all company employees, supervisors, leaders, clients, customers, prospects, or others with special relationships with the company (e.g., contractors, vendors, consultants, etc.). Neither will the company tolerate actions, statements, behavior, jokes, nor comments considered derogatory or negative reflection of any person's age, sex, ethnicity, sexual orientation, religion, or disability.

Human Resources or the company's legal representatives should be contacted if harassment of any kind is a concern or an issue. If you are not sure whether or not the statement you are about to make would be considered harassment - **DO NOT MAKE IT!**

The victim of any form of harassment should consider the following steps: 1) Inform the offender that you consider the remarks, actions, or behavior offensive and to discontinue it in your presence; 2) If the behavior continues or you are uncomfortable approaching the offender, bring the matter to the attention of the next level above the offender or any leader with whom you are comfortable; 3) If the behavior persists, contact Human Resources and the company's legal representative; 4) Sexual harassment and other malicious behavior are serious and harmful to the victim and company; 5) Consequently, the company will deal with such matters or allegations fairly and summarily.

HEALTH & SAFETY - The organization will comply with health, safety, and environmental laws and regulations; and, it will develop and implement policies and standards where vital laws or regulations do not exist. Employees are responsible for notifying supervisors and managers (e.g., site, HR, etc.) of any situation or condition that poses a safety, health, or environmental danger to the employees and/or community.

SUBSTANCE ABUSE - The organization is committed to maintaining a workplace free of alcohol and drug abuse; and, the company prohibits the possession, use, distribution, sale, or purchase of any illegal drugs or controlled substances on company operated or owned facilities or property other than that which is medically prescribed.

Certain drugs - including alcohol - can alter the user's behavior and may contribute to a combination of work related problems, including violence. Therefore, any employee who has knowledge of individuals who

possess, sell, use, distribute, or is working under the influence of illegal drugs, alcohol, or any other controlled substance on or off company property must inform the appropriate company manager or supervisor. Whether or not employees or persons with special company relationships are permitted to consume alcohol during business hours is at the discretion of the site and/or business unit manager.

CONFLICT OF INTEREST - The organization understands the employee's right to partake in activities outside of their job (e.g., financial, business, charity, social, etc.). However, activities outside of company employment must not conflict with or appear to conflict with company responsibilities or duties. Conflicts of interest can develop when an outside activity creates the following situation or condition: 1) Misuse of company assets or influence; 2) Effects an employee's objectivity, judgment, or decision making when representing the company; 3) Any business activity in which products and services compete with those of those offered by the company; 4) Prevents an employee from efficiently and effectively performing company assigned duties and responsibilities; and 5) Diverts business from the company.

Avoid Questionable Business Interests - Employees are expected to refrain from any investments, interests, associations, or relationships that interfere or has the potential of interfering with objective decision making or judgment in support of the company's best interest. Employment with a company competitor - while employed with the company - is prohibited.

Customer, Client, & Supplier Relationships - Employment, consulting, or providing products and services to organizations with special company business relationships (e.g., suppliers, clients, etc.) is not allowed without approval from the appropriate business unit manager.

The company may acquire products and services from a variety of sources. Company employees involved in the evaluation and selection processes must avoid situations that impede or appear to impede the ability to make free and independent decisions when making purchases on behalf of the company.

The sale of products and services - as well as procuring products and services - must be free from any inference or perception that favorable treatment was asked for and/or provided. Accepting gifts such as entertainment awards, special accommodations, services, favors, etc. are prohibited. Employees who are offered or receive any gifts or favors - that would be considered substantial - should not be accepted or returned; and, the supervisor or manager should be informed.

This guideline does not apply to items of small value often exchanged in business relationships; nevertheless, the employee should use discretion and common sense before accepting "questionable" gifts or rewards. When in doubt, refuse the offering or contact the company's legal representative for advice.

SOCIAL ACTIVITIES - Participating in social activities with business partners, associates, clients, vendors, customers, and prospects is a common practice. However, such activities must be reasonable and based on an unmistakable business purpose with good taste. Such activities may include dinners, sporting events, picnics, etc.; however, excessive amusement or questionable conduct is unacceptable.

Gifts, Favors, and/or Entertainment - The following guidelines should be considered: 1) comply with accepted business practice; 2) comply with local laws and ethical standards; 3) must not have the propensity of being construed as a bribe or payoff; 4) if publicly disclosed, must not create an embarrassment to the employee or the company.

FAMILY APPLICATION - The organization recognizes that family members have their own duties and responsibilities beyond the control of the employee. Nevertheless, employees must be sensitive to conflict of interest issues within the family dynamics. It is the employee's responsibility to preclude the disclosure of information - even to family members - when the well-being of the company is a stake.

Employees must not supervise or be under the supervision of family members. More importantly, employees must not be in a position to influence the salary or working environment of a family member.

DISCLOSURE - Employees are responsible for disclosing any situation that is or might be perceived as a conflict of interest. In such cases, the employee should contact the immediate supervisor or manager.

Note: Even if no conflict of interest exists, it is better to err on the side of precaution and let the company infrastructure sort out the matter.

CONFIDENTIAL INFORMATION - The unauthorized release or disclosure of confidential or sensitive information can jeopardize the company's competitive edge, damage company-client relationships, prove embarrassing, or harm fellow employees. Additionally, the release of personal information can result in civil and criminal litigations towards the company, the company's leadership, and/or the custodians of the personal information.

Confidential information - that which the leadership, information owner, or information custodian deems critical to the well-being of the company and its clients - should be safeguarded from improper disclosure to the public or other unauthorized personnel. Confidential information may include - but is not limited to - strategic plans, client information, marketing and sales data, technical information, security countermeasures, and personnel information such as, payroll, health, and insurance records.

It is the employee's responsibility - whether information owner, creator, custodian, or user - to ensure the security of confidential or sensitive information in accordance with established policies and standards. Confidential or sensitive information must be made available only on a need-to-know basis - when there is a valid business reason to disclose such information.

POLITICAL ACTIVITIES - No employee shall contribute company funds, property, or other resources to political organizations (e.g., parties, campaigns, candidates, etc.). This policy must be adhered to even if local, regional, or country laws and regulations permit such practices. Additionally, no employee shall use the company or their position in the company to influence another's decision or participation with respect to political contributions or activities.

This policy does not, however, prevent activities designed to communicate company view or positions to legislators, government organizations, or the general public with respect to legislation or policies designed to affect company business operations.

REPORTING VIOLATIONS - The policy suggest that employees err on the side of precaution; consequently, any form of reprisal for raising issues - in good faith - regarding violations of our policy will not be tolerated. Therefore, actual or suspected violations of this Code of Conduct should immediately be reported to the supervisor, manager, or other company official (e.g., Human Resources, legal representatives, security officer, etc.). In some situations, the incident reporting form should be used to document policy violations.

COMPLIANCE:

This Code of Conduct offers a broad range of guidance with respect to employee and business integrity. It cannot address all possible scenarios or situations. It does, however, suggest that employees should be held accountable for their actions and inactions and exercise good judgment while representing the company or conducting company business.

ENFORCEMENT:

Failure to comply with the company Code of Conduct may result in disciplinary actions up to and including termination.

REFERENCES:

ISO 27002 Standard:

8.1 Prior to employment; 8.1.1 Roles and responsibilities; 8.1.2 Screening; 8.1.3 Terms and conditions of employment; 8.2.3 Disciplinary process.

NIST SP 800 Standard:

NIST SP 800-53 Security Controls: Personnel Security Family

OTHER Standard:

COMMENTS, ADDITIONAL INFORMATION, EXAMPLES: