

# CODE OF ETHICS or CONDUCT

(Company Name) has committed to high standards of ethical marketing and business practices. We believe this is the best way to assure the continued success of the company and the pride of its employees. (Company Name) and its employees will, therefore:

- Obey the letter, as well as the spirit, of laws and regulations.
- Practice fair and complete disclosure in the marketing, advertising and sales of its products, avoiding false or misleading representation.
- Write all policies, communications and correspondence in clear and direct language.
- Select and train employees of integrity, who will maintain high levels of courtesy and professional competence through continued education.
- Take swift and appropriate actions against those who deliberately violate standards of ethical conduct.
- Uniformly apply fair and accurate underwriting policies; promptly disclose adverse underwriting decisions.
- Pay all due claims fairly and promptly, with utmost courtesy in their handling.
- Fairly consider all customer complaints and take appropriate legal and ethical actions to satisfy upheld complaints, and take steps to resolve any underlying issues discovered.
- Maintain professional and proper personal conduct that will reflect favorably on the company and on the insurance industry.
- Avoid false or disparaging remarks about competitors, their products, their employees and representatives, and their sales methods.
- Foster a company culture of choosing to do the right things right.
- Whistleblower protection:

[Business name] employees are expected and required to comply with all federal and state “whistleblower protection” laws and regulations including the federal Whistleblower Protection Act (WPA). The WPA prohibits employers from retaliating against employees who make good faith reports, internally or externally, of suspected misconduct. Retaliation against those employees could, in some cases, be illegal and subject the individual engaging in retaliation to criminal prosecution. In conjunction with Department of Defense (DoD) contracts, 10 U.S.C. § 2409 prohibits contractors from discharging, demoting or otherwise discriminating against an

employee as a reprisal for disclosing, to any of the following entities, information that the employee reasonably believes is evidence of gross mismanagement of a DoD contract, a gross waste of DoD funds, a substantial and specific danger to public health or safety or a violation of law related to a DoD contract (including the competition for or negotiation of a contract):

- A member of Congress.
  - A representative of a committee of Congress.
  - An Inspector General that receives funding from or has oversight over contracts awarded for or on behalf of DoD.
  - The Government Accountability Office.
  - A DoD employee responsible for contract oversight or management.
  - An authorized official of an agency or the Department of Justice.
- Any employee who believes that he or she has been discharged, demoted or otherwise discriminated against contrary to the prohibition set forth above may file
- a complaint with the DoD Inspector General.

[I have read and understood these standards of ethical business conduct.]

[I have read, understood, and agree to abide by these standards of ethical business conduct.]

Signature \_\_\_\_\_ Date \_\_\_\_\_

Printed Name \_\_\_\_\_

Department \_\_\_\_\_

Supervisor's Signature \_\_\_\_\_

**Disclaimer:** This document is for reference only and to be used at the consumer's own risk. The Huntington Ingalls Industries and their subsidiaries (HII) disclaim any and all liability for any consequences arising out of your use of this document. HII does not guarantee that any or all aspect of this document has been updated to reflect any changes or developments in the law. As such, the Defense Industry Initiative (DII) is not responsible for any subsequent regulatory or legal changes that may render this document obsolete. By posting this document, HII is not providing legal advice and is not agreeing

to enter into an attorney-client relationship. Please consult with legal counsel to advise you on establishing, maintaining, and auditing your compliance program.