

THE POWER OF ETHICS

VENDOR OUTREACH PROGRAM

Since 2014, Con Edison has been assisting contractors and vendors interested in starting or enhancing their ethics and compliance programs. We are committed to acting with the highest ethical standards and partnering with contractors and vendors who share our commitment.

Please review these Frequently Asked Questions (FAQs) about our Vendor Outreach Program.

1. What are the benefits of starting or enhancing an ethics and compliance program?

- Demonstrates your commitment to a culture that supports ethics and compliance with the law to your employees, current and potential customers, business partners, and other stakeholders
- Qualifies your firm for contracts with organizations requiring an ethics and compliance program (e.g., government contractors must have a written Code of Conduct)
- Creates a competitive advantage over companies that don't have an ethics and compliance program
- Sets expectations of appropriate conduct for your employees
- Potentially mitigates governmental or regulatory penalties related to wrongdoing

2. Why is it important for Con Edison to partner with companies that have an ethics and compliance program?

We believe that conducting business in an ethical manner is the right thing to do and is vital to the long-term success of our company. In addition to our own behavior, this expectation extends to our business partners whose actions may reflect on us.

The U.S. Federal Sentencing Guidelines offer guidance relating to designing and implementing compliance programs and serve as a standard used by government agencies to evaluate ethics and compliance programs. The guidelines encourage large organizations to assist small organizations with implementing effective ethics and compliance programs. This is one of the ways Con Edison can assist smaller organizations who share our high ethical standards.

3. What are the components of an effective ethics and compliance program?

The U.S. Federal Sentencing Guidelines identify seven components of an effective ethics and compliance program:

1. Having a system for assessing Ethics and Compliance risk
2. Establishing policies, procedures, and controls
3. Establishing roles and responsibilities
4. Performing due diligence of personnel to prevent and detect criminal conduct (particularly those in levels of heightened responsibility)
5. Providing ongoing training and communications
6. Providing a channel to report concerns, seek guidance, and ask questions
7. Investigating issues and preventing further incidents related to wrongdoing or criminal conduct

4. Does a business partner of Con Edison have to establish an ethics and compliance program to continue doing business with Con Edison?

Participation in the Vendor Outreach Program is currently voluntary. Con Edison is constantly looking to expand the performance of our vendors and improve ethics and compliance.

5. How can a small business afford to start such a program?

There are cost effective ways to set up an ethics and compliance program. The U.S. Federal Sentencing Guidelines state that small businesses must demonstrate the same commitment to ethics and compliance as large organizations but can meet the requirements with less formality and related expense. In addition, not all components of a recommended ethics and compliance program need to be launched at once. You can select the areas that would be most beneficial and build your program over time.

6. How can Con Edison help me?

To begin the process, we will arrange a call to discuss your ethics and compliance needs. Once they're determined, we will work with you to implement the steps to develop or enhance your ethics and compliance program and address those needs.

Based on our experience, contractors and vendors most commonly start with creating a Code of Conduct: A document that serves as a daily guide for ethics, integrity, and compliance. Codes of Conduct often include: Information to address the components of an effective ethics and compliance program, including how to report an ethics and compliance issue; criteria for selecting the ethics officer(s); and the process for investigating concerns. In addition, a Code of Conduct might contain information on ethics and compliance training.

Con Edison has sample Codes of Conduct and other resources available to share with you.

7. How can I get started?

Complete the Ethics and Compliance Assessment Questionnaire (below) and send it to FORETHX@conEd.com. A member of our team will contact you with next steps. Or, call 1-855-FOR-ETHX (1-855-367-3849) to speak with a member of our team.



Ethics and
Compliance Program

Informational Resources

Con Edison

- Con Edison Vendor Outreach Presentation



Vendor Outreach
Presentation Final 1

- Con Edison Standards of Business Conduct
<https://www.coned.com/-/media/files/conedison/standards-of-business-conduct.pdf>
- Vendor Code of Conduct
[Vendor Code of Conduct](#)

Government

- Federal Sentencing Guidelines for Organizations
<https://www.ussc.gov/guidelines/2016-guidelines-manual>
- Department of Justice Evaluation of Corporate Compliance Programs
<https://www.justice.gov/criminal-fraud/page/file/937501/download>
- Foreign Corrupt Practices Act (FCPA)
<https://www.justice.gov/sites/default/files/criminal-fraud/legacy/2012/11/14/fcpa-english.pdf>
- FCPA Resource Guide
<https://www.justice.gov/sites/default/files/criminal-fraud/legacy/2015/01/16/guide.pdf>
- U.S. Attorneys Manual, Principles of Federal Prosecution of Business Organizations
<https://www.justice.gov/usam/usam-9-28000-principles-federal-prosecution-business-organizations#9-28.800>
- Office of Government Ethics
<https://www.oge.gov/>
- Federal Acquisition Regulation 52.2013-13
https://www.acquisition.gov/far/html/52_200_206.html
- Homeland Security Human Trafficking Awareness Training (online module)
<https://www.dhs.gov/blue-campaign/awareness-training>

Industry

Ethics & Compliance Initiative (ECI)

- Toolkit
<https://www.ethics.org/resources/free-toolkit/>
- Principles & Practices of High-Quality Ethics & Compliance Programs
<https://www.ethics.org/resources/high-quality-ec-programs-hqp-standards/>
- National Business Ethics Survey
<https://www.ethics.org/knowledge-center/eci-recent-research/>
- Global Business Ethics Survey
<https://www.ethics.org/knowledge-center/2018-gbes/>

Defense Industry Initiative on Business Ethics & Conduct (DII)

- <https://www.dii.org/home>
- <https://www.dii.org/featured-tools>
Small Business Toolkit
Creating and Maintaining an Effective Ethics & Business Conduct Program

Corporate Compliance Answer Book

- https://www.pli.edu/product_files/Titles%2F2470%2F%23205998_02_Corporate_Compliance_Answer_Book_2018_P3_20170915151415.pdf

Ethics and Compliance Membership Organizations

- Ethics & Compliance Initiative (ECI)
<https://www.ethics.org/>
- Society of Corporate Compliance & Ethics (SCCE)
<https://www.corporatecompliance.org/>

