

LRN *Inspiring Principled Performance®*

2026 Code of Conduct Report

THE CULTURE
BEHIND THE CODE:

Turning standards
into everyday
decisions



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Introduction

Companies face growing expectations from employees, regulators, customers, and communities to show ethical leadership. As workplaces become more diverse, dispersed, and influenced by artificial intelligence (AI), the role of the corporate code of conduct is changing. Once viewed mainly as a compliance document, today's code is expected to do more. It should reinforce company values, support a strong ethical culture, and guide employees as they make sound, ethical decisions in their day-to-day work.

The 2026 *LRN Code of Conduct Report* examines how companies can meet that challenge. It combines two perspectives: An analysis of more than 1,000 codes of conduct and survey responses from approximately 2,000 employees across multiple countries. Together, these findings show how companies design and deploy their codes, and how employees experience them. This year's report looks beyond whether organizations

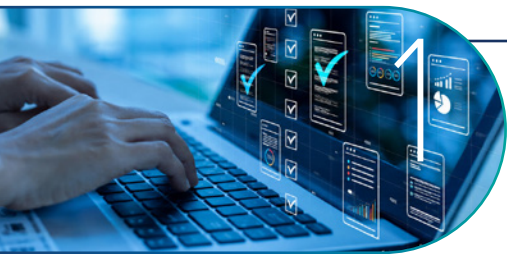
have a code and what it includes. Instead, it explores whether employees can easily find, understand, and use the code in their daily work. It also examines how well today's codes address new risks and support ethical decision making.

The research points to an important shift. For most companies, creating a code of conduct is no longer the biggest challenge; making it useful is. Employees need a code they can access, understand, trust, and apply when questions arise. As organizations respond to new technologies, changing workforce expectations, and a more complex risk environment, the code of conduct is becoming more than a collection of policies. It is becoming a practical tool that helps employees turn company values into everyday actions. This report is designed to help ethics and compliance professionals understand that shift and identify ways to make their codes stronger, more practical, and more effective.



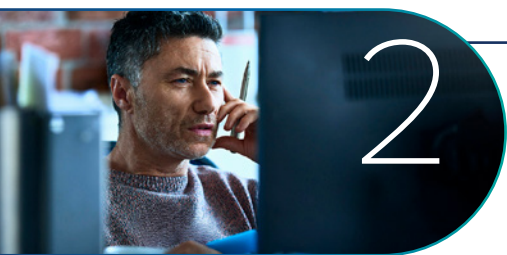
Key findings

Five insights shaping the next generation of codes of conduct



Code usage is strong, but there's room for improvement.

Formal code adoption is widespread: Nearly all employees say their organization requires them to certify or acknowledge the code. But everyday engagement is less consistent. 63% of employees say they have used the code as a resource, down from 70% in 2025, and only about 1 in 4 use it often or very often outside of formal training. Meanwhile, website access increased by 6 percentage points, although PDFs remain the dominant format. The challenge is shifting from simply providing the code to making it a practical resource employees will use throughout the year.



Many codes fall short on practical guidance.

Access is only the beginning. Nearly 1 in 4 employees say their code is difficult to navigate, while nearly 1 in 5 say it lacks practical guidance. More than 80% of codes analyzed have a good layout, and about 80% direct employees to related policies. But practical decision aids are much less common: Only about 40% include a decision-making model and fewer than 1 in 3 include scenario-based Q&As. Effective design means helping employees not only find information but understand how to apply it when difficult decisions arise.



Codes lag in addressing emerging risks.

Traditional compliance topics remain firmly established. Nearly every code addresses conflicts of interest and confidential information, while more than 90% address bribery and corruption. Emerging and operational risks appear far less consistently. Fewer than 1 in 10 explicitly address AI or technology ethics, while security and crisis management and competitive intelligence appear in only about 1 in 3. The opportunity is not to add every new risk, but to keep the code aligned with your latest risk assessment and the issues employees most need guidance on today.

Key findings

Five insights shaping the next generation of codes of conduct



Keeping the code relevant takes more than training.

Training remains valuable: Among employees who receive code training, nearly all say it helps them understand how to use the code. But training now reaches 78% of employees, and only about 3 in 5 say their manager talks about the code. Confidence in speaking up also shows room for improvement. Nearly all analyzed codes provide reporting resources, but only about 2 in 5 explain investigation procedures, and only 66% of employees are confident they can report misconduct without retaliation. Keeping the code relevant requires reinforcement through managers and leaders, along with greater transparency about what happens after employees speak up.



Effective codes balance substance and usability.

More effective codes tend to cover more ground. They score nearly twice as high as less effective codes on LRN's effectiveness framework and are substantially more comprehensive. But more content creates a design challenge: Nearly 1 in 4 employees say their code is too long or difficult to navigate, rising to about 1 in 3 with Gen Z employees. The finding is not that longer codes are better. Effective codes need enough substance to address the issues employees face, supported by design, navigation, and practical guidance that make that substance useful for a diverse workforce.



1 Code usage is strong, but there's room for improvement

The challenge

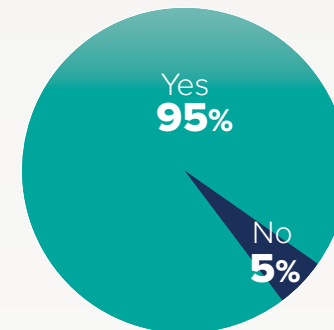
Organizations have largely solved the challenge of making a code of conduct available to employees. But is access enough? If employees acknowledge the code every year, does that mean they use it when difficult decisions arise? Which matters more today: Providing the code, or making it easy to find, navigate, and apply in the flow of work? And as employee expectations shift toward digital, searchable, and practical resources, how should ethics and compliance leaders think about accessibility and engagement? This finding examines where organizations have made meaningful progress and where opportunities remain to turn broad adoption into everyday use.

Code adoption has become the norm

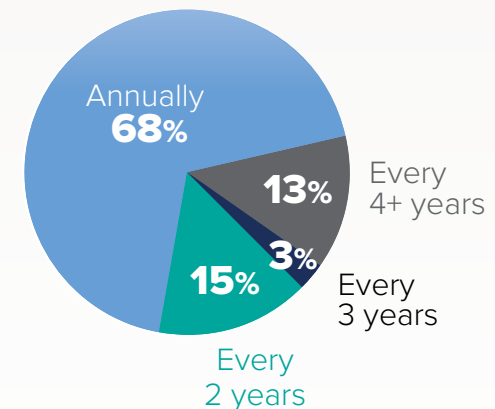
Organizations have made progress in institutionalizing codes of conduct. Formal acknowledgment requirements are now nearly universal, with almost all employees reporting that their organization requires them to confirm their code of conduct. For 68% of those employees, this is an annual requirement. These findings demonstrate that organizations have successfully embedded codes into core ethics and compliance processes and have established a consistent expectation that employees are aware of basic behavioral requirements.

Code acknowledgment/certification

Does your company require that you certify or acknowledge that you have read and will comply with the code?



How often does your company require that you certify or acknowledge that you have read and will comply with the code?



Source: Employee Survey (2026)

Practical engagement lags adoption

Widespread adoption of the code should not be mistaken for widespread use. Certification confirms that employees have received the code, but it does not show whether they rely on it after onboarding, certification, or training. While formal governance is strong, employee engagement with the code appears to have softened over the past year. In 2026, 63% of employees reported having used the code as a workplace resource, down from 70% in 2025. However, only about one third said they used the code often or very often.

ACTIVITY DOES NOT EQUAL IMPACT

Formal activity does not necessarily equal impact. LRN's [2026 Ethics & Compliance Program Effectiveness Report](#) emphasizes that completion metrics alone provide a limited view of program effectiveness. The same principle applies to the code: Acknowledgement and certification show reach, but ongoing

use provides a different measure of whether the code is functioning as a practical resource.

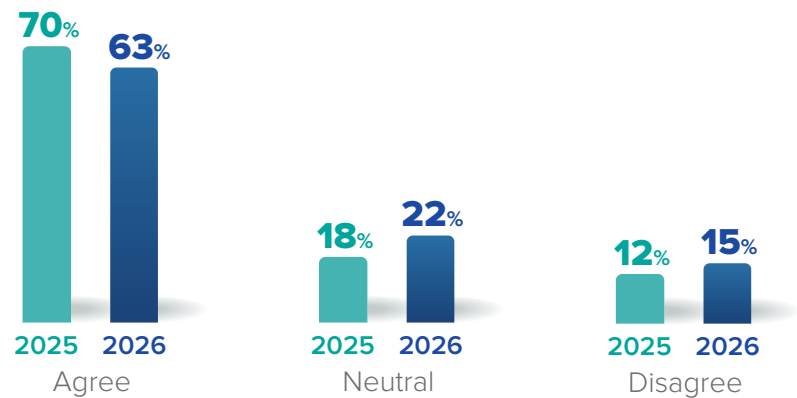
Source: LRN 2026 Ethics & Compliance Program Effectiveness Report



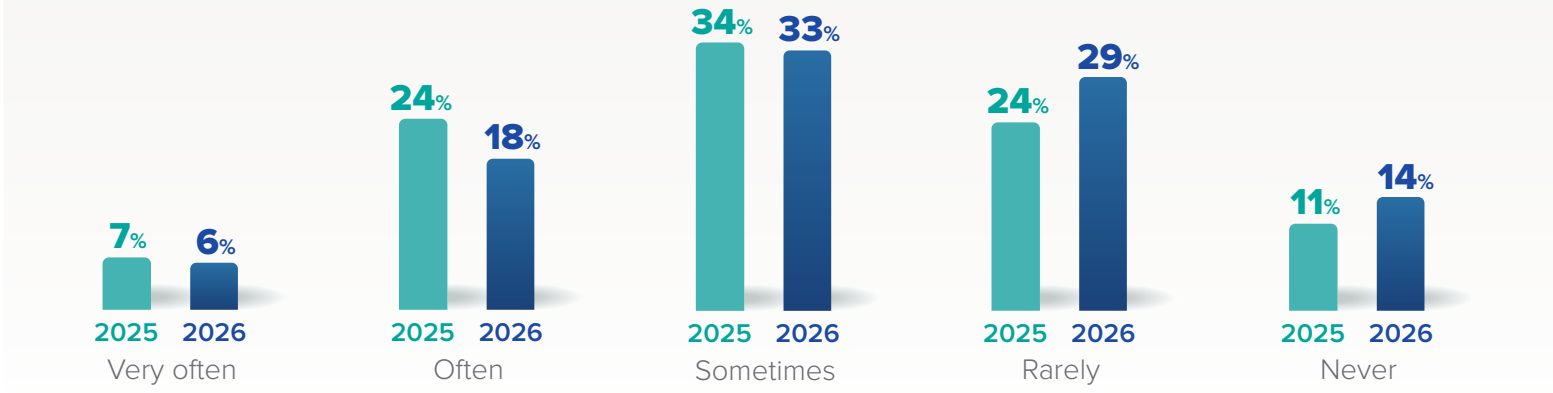
Using the code as a resource

These findings suggest that employees view the code as a practical source of information, not simply as a compliance requirement. At the same time, the year-over-year decline in use suggests that organizations cannot take that relevance for granted. It may reflect changing employee expectations for workplace resources. In an environment where information is expected to be searchable, personalized, and immediately available, employees may be less likely to consult static documents unless those resources are designed for practical, everyday use.

I have used my company's code of conduct as a resource.



Outside of formal code of conduct training, how often have you used your organization's code of conduct as a resource in the past year?



Source: Employee Survey (2026)

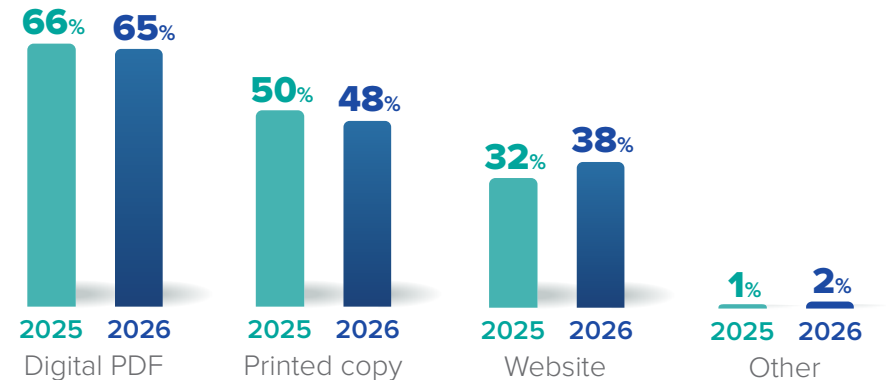
Web codes gain traction, but PDFs still dominate

Access remains a foundation, but the format in which employees receive the code is becoming more important. The survey shows that 65% of employees receive a digital PDF version of the code, 48% receive a printed copy, and 38% have access to the code through a website. Compared with 2025 responses, website access increased by 6 percentage points, while PDF and printed formats declined slightly.

Beyond acknowledgment: Making the code matter

Our findings show that formal code adoption is no longer the primary challenge. Most organizations require employees to acknowledge the code, and access continues to expand through digital formats. However, employee engagement tells a different story. Employees report using the code less often than they did a year ago, and many read it only during required training. Together, these findings point to the next opportunity for ethics and compliance leaders: Moving beyond access to create an employee experience that makes the code a practical, go-to resource year-round, rather than a document employees acknowledge annually or only when they are hired.

In what format does your company provide the code of conduct to you?



Source: Employee Survey (2026)

RECOMMENDATIONS FOR INCREASING CODE ENGAGEMENT

- **Design for usability.** Design the code with the end user in mind.
- **Make the code the “front door” to your program.** Establish the code as a “front door” to your program by linking it to related ethics and compliance policies, training, and other resources.
- **Go digital.** Publish the code in a web-based, interactive, and searchable format.
- **Communicate.** Communicate about the code often through multiple channels at all levels.
- **Remind.** Remind employees often on how to use the code.



2 Many codes fall short on practical guidance

The challenge

Employees may know how to find their company’s code of conduct, but what happens next? Can they quickly find the information they need? Does the code help them work through a difficult decision or provide enough detail without being difficult to navigate? This finding examines how employees experience the code and how codes can be made easier to use, understand, and apply in everyday work.

Many codes are not easy to use

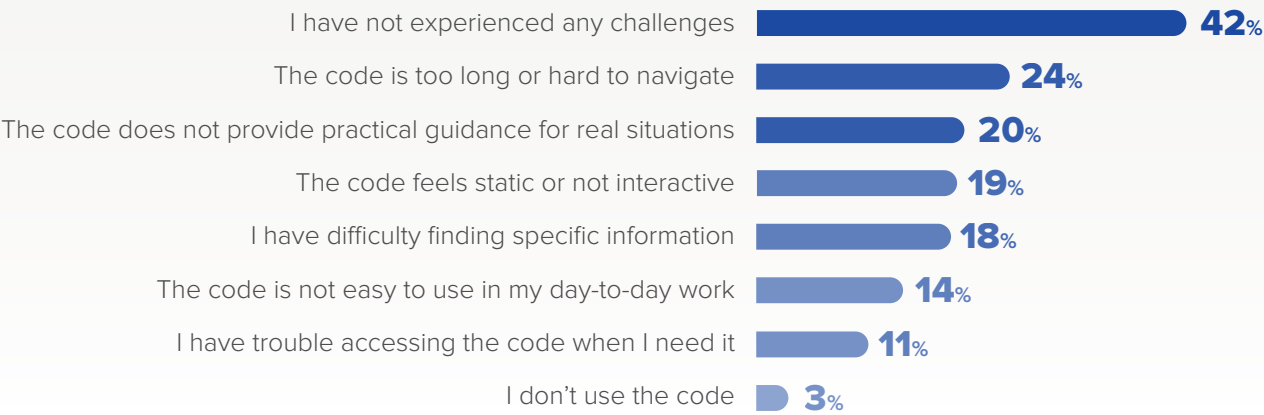
On a positive note, only 3% of the employees surveyed said they don’t use the code at all. However, only 2 out of 5 employees report having no challenges when using their organization’s code. The most common concern is that the code is too long or too difficult to navigate, cited by almost a quarter of respondents.

Nearly 1 in 5 say the code lacks practical guidance or feels too static or non-interactive. Others report difficulty finding information or say the code is not easy to apply to their day-to-day work.

These findings suggest that access is only the first step. Employees also need to be able to locate the right information without working through a long or complicated document. A code may address every required topic, but that content has limited practical value if employees cannot find it when a question arises. The challenge becomes more important as codes expand to address new risks, policies, and workplace expectations. More content can make a code more complete, but it can also make the document harder to use. The goal is not simply to make the code shorter. It is to organize information so employees can move through it easily and reach the guidance they need.

Which challenges, if any, have you experienced when using your code of conduct?

Select all that apply



Source: Employee Survey (2026)

Helping employees navigate ethical decisions

Our analysis of more than 1,000 codes of conduct across the globe shows that many companies have adopted basic design and navigation features. 8 in 10 codes have a good overall layout and direct employees to relevant policies. Almost two-thirds include a table of contents. More than half prominently display useful resources.

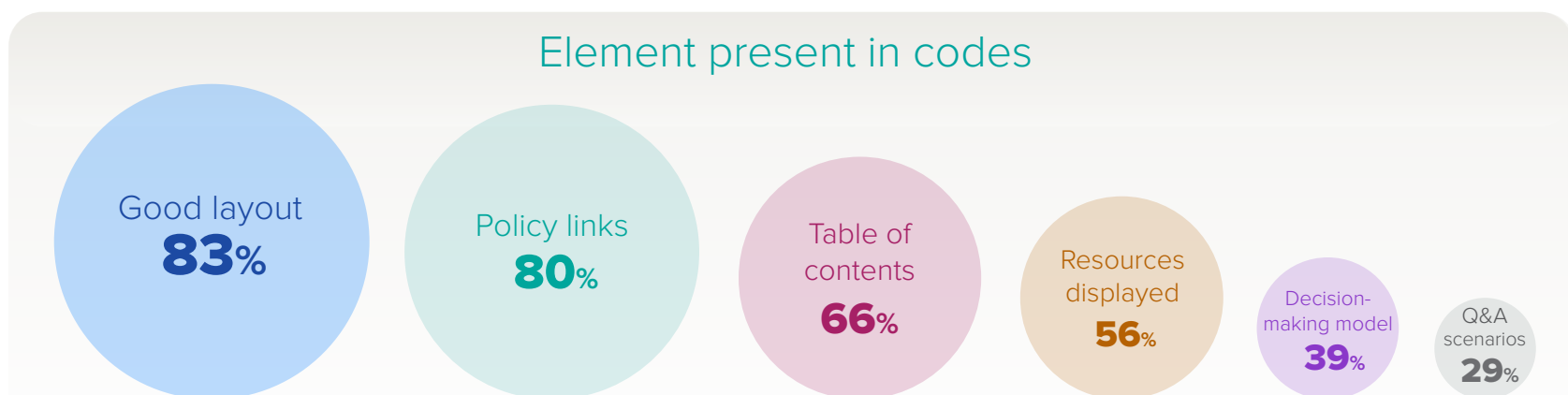
Practical decision aids are much less common. Only 4 in 10 include an ethical decision-making model, and just under one-third include scenario-based questions and answers.

A well-organized code helps employees find information; a useful code helps them decide what to do with it. Employees may be trying to decide whether a gift is appropriate, how to respond to pressure from a customer, whether information can be shared,

or when a concern should be reported. In those moments, a rule alone may not be enough.

An ethical decision-making model helps employees pause and consider a consistent set of questions. Is the action legal? Does it align with company values? Would the employee be comfortable if the decision became public? Who could provide additional guidance? These tools do not replace policies or professional advice, but they can give employees a practical starting point.

Scenarios serve a similar purpose. They show what a principle looks like in a realistic work setting and help employees connect broad expectations to the situations they may face. A short question-and-answer example can often make a complex standard easier to understand than another paragraph of policy language.



Source: Code Analysis (2026)

Designing for usability

Enhancing the usefulness of the code means designing around how you want employees to use it. Our findings point to a need to balance comprehensive content with easy navigation and practical guidance, making it simple for employees to find answers, understand how standards apply to real situations, and know where to go for additional support. Clear organization, searchable content, links to relevant resources, and practical tools such as decision-making models and scenarios can help move the code beyond a reference document toward a more useful resource for everyday decisions.

Practical guidance matters most when the right answer is not the easy one

LRN's [*2024 Benchmark of Ethical Culture Report*](#) found that 23% of employees said it is OK to break



the rules if needed to get the job done, while 14% reported personally engaging in behavior that violated their company's code or standards in the prior year. The research identified ethical managers, trusted teams, and an environment where employees can question actions that conflict with company values or standards as important drivers of principled performance.

Source: LRN 2024 Benchmark of Ethical Culture Report

RECOMMENDATIONS FOR IMPROVING THE EMPLOYEE EXPERIENCE

- **Make the code easier to navigate** with clear headings, logical organization, and strong search functionality.
- **Add practical decision tools** such as ethical decision-making models, scenarios, and concise Q&As.
- **Connect employees to next steps** with direct links to relevant policies, training, reporting channels, and supporting resources.
- **Use clear, concise language** so employees can quickly understand and apply guidance when they need it.





3 Codes lag in addressing emerging risks

The challenge

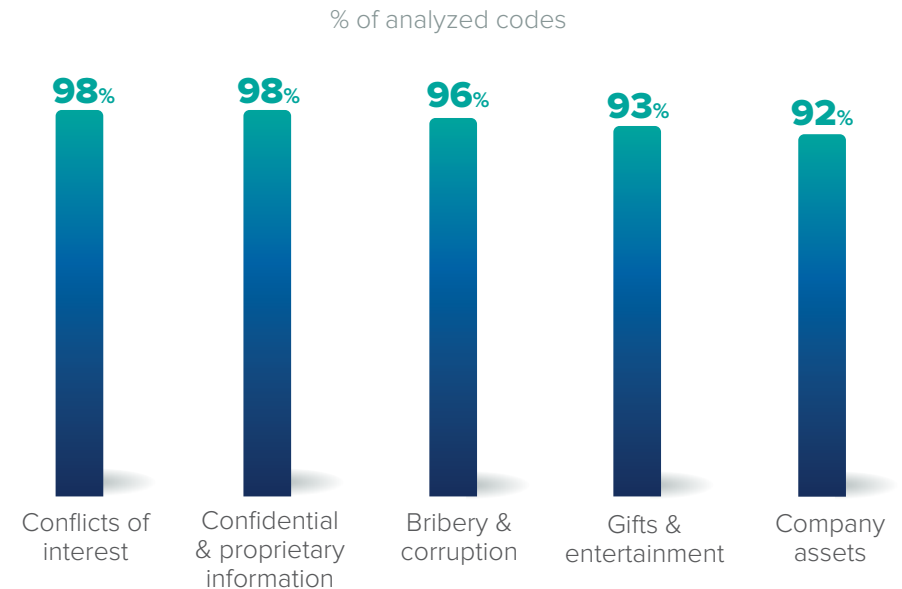
Every code reflects the risks of its time, but today those risks are changing so fast that many codes are not keeping up. Traditional topics such as conflicts of interest, bribery and corruption, and confidential information remain essential, while AI, cybersecurity, evolving regulations, and complex global operations are creating new ethical questions. How can organizations keep their codes current without simply making them longer? And which emerging risks belong in the code versus supporting policies and training? The challenge is maintaining strong compliance fundamentals while keeping pace with what comes next.

The foundation is strong

Organizations continue to build their codes on a consistent foundation of traditional compliance topics. Our analysis of more than 1,000 codes reveals strong consistency in the risks organizations prioritize. Nearly every code addresses conflicts of interest and confidential and proprietary information, while more than 9 in 10 cover bribery and corruption, gifts and entertainment, and protection of company assets.

The prevalence of these topics across industries, regions, and company sizes underscores their role as the common language of ethics and compliance programs worldwide. This consistency suggests that organizations have largely established a shared set of compliance fundamentals - the core topics employees can expect to find in a code. The next challenge is to build on that strong foundation as new workplace risks emerge.

Traditional compliance topics remain nearly universal



Source: Code Analysis (2026)



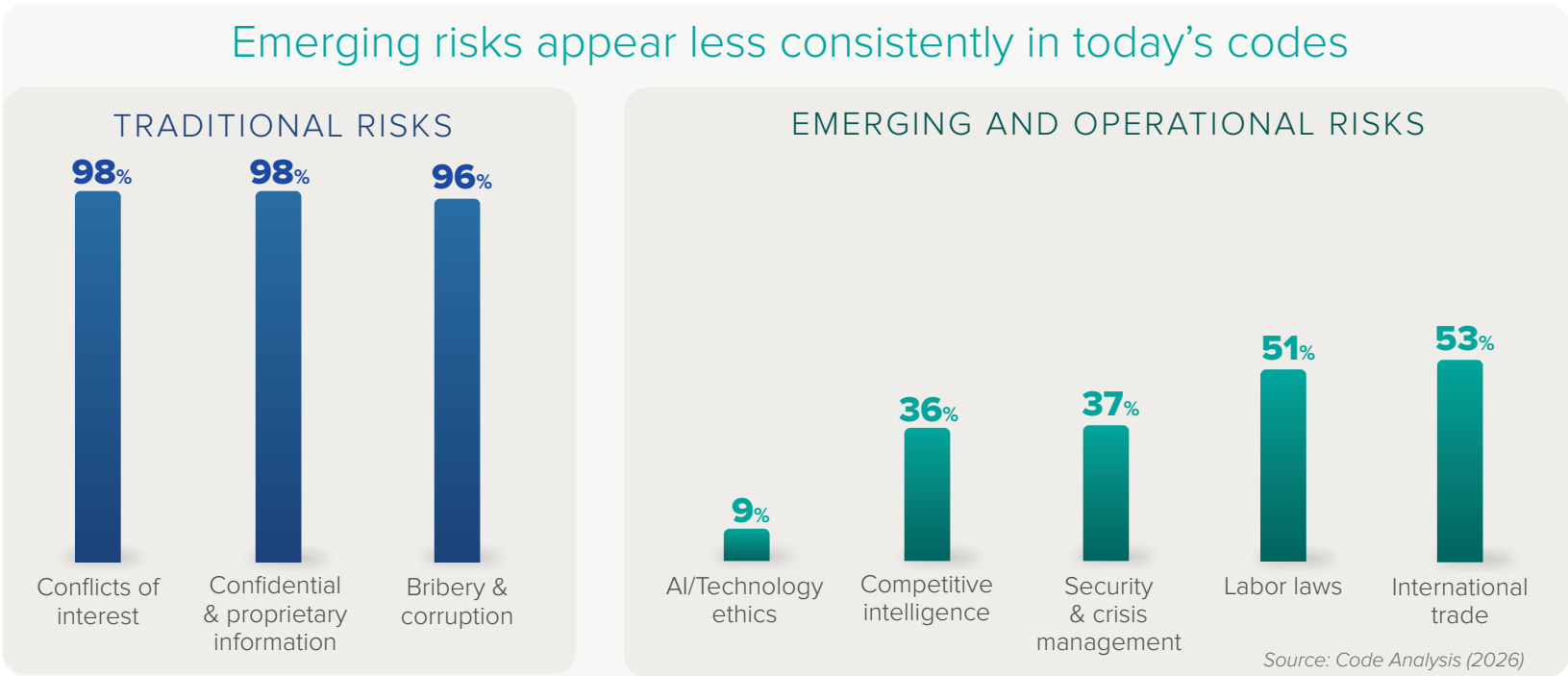
Preparing for what's next

A code cannot stay relevant if the risks around it keep changing while its guidance stands still. Traditional compliance topics are firmly established in today's codes, but newer and evolving risks appear far less consistently. While foundational topics appear in more than 90% of codes, international trade and labor laws appear in only about half, while security and crisis management and competitive intelligence show up in around one-third. The contrast highlights a wide gap between risks that have long been part of the compliance landscape and those that reflect a changing business environment.

That does not mean organizations are ignoring these issues; many may address them through policies, training, or other

program resources. But it raises an important question: Is the code evolving quickly enough to reflect the risks employees face today? New technologies, regulations, geopolitical pressures, and ways of working can create new questions long before the next major code refresh, making regular review more than a maintenance exercise.

For ethics and compliance leaders, the opportunity is to keep the code aligned with the organization's changing risk environment and evolving global regulatory expectations. The goal is not to add every new risk to the code, but to ensure it continues to address the issues employees most need help navigating. A modern code should not simply document the risks an organization has faced in the past. It should evolve to help employees navigate the risks they face now and into the future.



AI is leading the conversation

No topic better illustrates the pace of change than artificial intelligence.

Employees are already using AI to write content, analyze information, support customers, develop software, and make everyday business decisions. Yet according to our code analysis, only 9% of analyzed codes explicitly address AI or technology ethics.

The broader ethics and compliance profession is evolving in parallel. The [*2026 Ethics & Compliance Program Effectiveness Report*](#) found that organizations are investing more heavily in AI-enabled compliance tools, analytics, and automation. At the same time, many organizations continue working to build the governance, measurement, and oversight needed to use those technologies effectively.

For most organizations, preparing employees for AI will not require an entirely new section of the code. Instead, it presents an opportunity to connect emerging technologies back to the ethical principles employees already understand: accountability, fairness, transparency, protecting confidential information, and using sound judgment. Those principles remain relevant regardless of how technology evolves.

Only 9% of analyzed codes explicitly address AI or technology ethics.

Source: Code Analysis (2026)

In summary

Organizations have established a strong foundation around traditional compliance topics. The next opportunity is helping employees apply those same ethical principles to new technologies, changing business models, and increasingly complex workplace decisions. The strongest codes will not simply add more content. They will help employees navigate emerging risks with practical guidance that is easy to find, easy to understand, and easy to apply.

RECOMMENDATIONS FOR PREPARING CODES FOR EMERGING RISKS

- **Include emerging risks.** Build emerging risks into the code review process. Regularly assess whether the code reflects changes in the organization's risk profile, business environment, and regulatory landscape, and update guidance where needed.
- **Connect guidance on new technologies**, including AI, to established ethical principles rather than creating standalone technical guidance.
- **Add links in the code** to supporting policies, training, and resources so guidance can evolve without continually expanding the document.

4 Keeping the code relevant takes more than training



The challenge

A code becomes meaningful when leaders and managers make it part of everyday work. Employees make ethical decisions in meetings, customer conversations, performance discussions, and other moments when the code may not be in front of them. In those moments, leadership communication and manager reinforcement can keep ethical expectations visible and relevant.

But are employees hearing about the code often enough outside formal training? Do they trust the organization enough to speak up when something goes wrong? And are managers equipped to reinforce the code in day-to-day decisions? The 2026 findings point to a central challenge: Moving the code beyond training and certification by making leadership and manager reinforcement part of how employees experience it throughout the year.

Reporting channels are common - Confidence is not

Most organizations make it clear where employees can raise a concern. Our analysis of more than 1,000 codes found that reporting resources appear in nearly all codes. But only about 2 in 5 explain what happens next by describing the investigation process. The message about where to report is clear; the message about *what happens after you do* is much less consistent.

Employee confidence also moved in the wrong direction. 69% of employees say their code explains the organization's stance on retaliation, down from 75% in 2025. And only 66% are confident they can report misconduct without facing retaliation, down from

71% a year ago. These findings do not tell us why confidence declined, but they highlight an important gap between providing a way to speak up and giving employees confidence in what will happen when they do.

Employees need more than a reporting channel. They need to know what to expect after raising a concern and understand the protections available to them. Ethics and compliance teams can help by making the process more transparent – explaining what happens after a report, making non-retaliation expectations easy to understand, and giving employees a clearer picture of what comes next.

Employees know where to report, but fewer codes explain what happens next

CODE CONTENT



Reporting resources



Investigation procedures

EMPLOYEE SURVEY



Code explains retaliation



Confident reporting without retaliation

Source: Code Analysis (2026) and Employee Survey (2026)

Managers keep the code relevant

Training introduces employees to the code, but managers help keep it visible in everyday work. Yet only 61% of employees say their manager talks about the code, down from 67% in 2025.

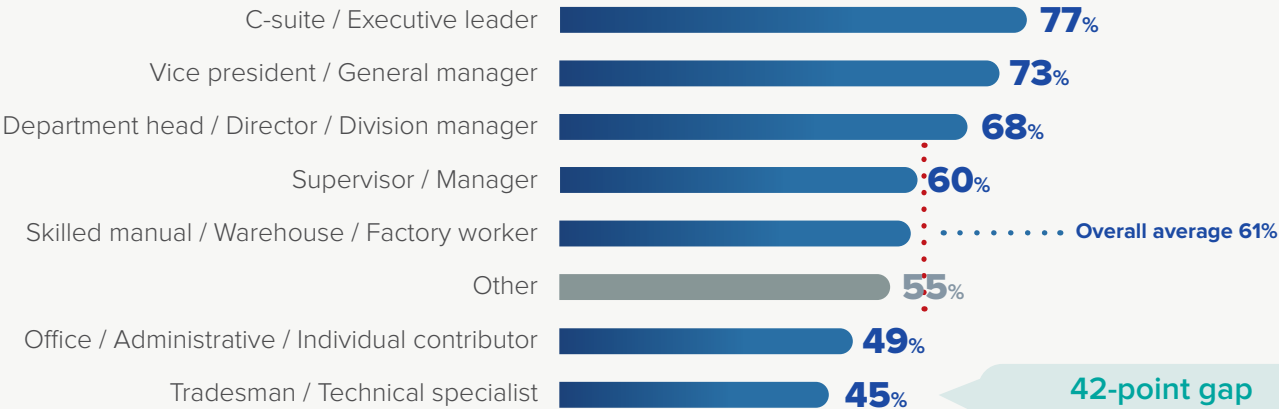
That experience also varies sharply by role. 77% of executives say their manager talks about the code, compared with 68% of directors and 60% of supervisors and managers. Among office and administrative employees and trades and technical specialists, that figure falls to fewer than half. The pattern is clear: Employees further from senior leadership report hearing about the code less consistently from their managers.

LRN’s [2026 Ethics & Compliance Program Effectiveness Report: The Next Leap](#) reinforces the importance of this connection. It identifies middle managers as a critical link between organizational expectations and employees’ day-to-day work, while highlighting the need for more role-specific training and practical tools that help managers translate values into everyday decisions.

Manager communication about the code varies by role

Percent who agree their manager talks about their code of conduct

60% of employees say their manager talks about the code.



42-point gap between executives and trades/technical specialists.

Source: Employee Survey (2026)

Reinforcement extends learning beyond training

Formal training remains a strong part of the employee experience. Among employees who receive code training, nearly all say it helps them understand how to use the code. But training is reaching fewer employees, with less than 78% reporting having received it, down from 85% in 2025.

These findings highlight why training should be part of a broader approach. Manager conversations, leadership communication, and practical reminders can reinforce the code throughout the year and connect it to everyday decisions. Training introduces employees to the code; ongoing reinforcement can help keep it visible and relevant.

RECOMMENDATIONS FOR ACTIVATING THE CODE

- **Ask managers to communicate about the code.** Make manager communication about the code part of regular team conversations rather than limiting it to annual training.
- **Increase employee understanding of the reporting and investigations processes.** Help employees understand not only how to report concerns, but also what to expect after they speak up.
- **Constant reinforcement.** Reinforce the code throughout the year with leadership messaging, practical guidance, and role-specific examples that connect ethical principles to everyday decisions.

Training works – but ongoing reinforcement matters

TRAINING REACH



TRAINING EFFECTIVENESS

Training helps employees understand how to use the code.

Source: Employee Survey (2026)

In summary

Leadership activates the code by keeping it visible beyond formal training. Reporting channels and training provide an important foundation, but employees also need to hear ethical expectations reinforced through the leaders and managers they encounter every day. The opportunity is to make the code part of an ongoing conversation – building trust around speaking up, equipping managers to reinforce expectations, and connecting the code to decisions throughout the year.

5 Effective codes balance substance and usability



What does a more effective code look like? The 2026 findings point to a balance. More effective codes tend to cover more ground, but employees still report challenges with length and navigation. And those challenges are not felt equally across the workforce.

The code analysis and employee survey tell two sides of the same story: More effective codes tend to be more comprehensive, while employees still need guidance that is easy to navigate and use. Together, the findings point to an important balance between comprehensive coverage and unnecessary complexity, recognizing that more content alone does not make a code more effective.

Strong codes provide enough depth

Our code analysis shows that codes rated as more effective under LRN's framework also tend to be more comprehensive. They cover more of the elements LRN evaluates across the dimensions of an effective code and, on average, contain substantially more content than codes rated as less effective.

But more content is not the same as greater effectiveness. The relationship is associative rather than causal. Higher-scoring codes tend to address more elements of LRN's effectiveness framework, which often requires more space to cover effectively.

That creates an important design challenge. As codes become more comprehensive, organizations also need to make that depth manageable for employees. The goal is not a longer or shorter code, but one with enough substance that is easy to navigate and use.

2026 Code Effectiveness Analysis

MORE EFFECTIVE CODES

LESS EFFECTIVE CODES



EFFECTIVENESS SCORE

91% vs. **53%**



AVERAGE PAGES

36 vs. **11**



AVERAGE WORDS

10,443 vs. **3,563**

Relationship is associative: Length alone does not determine effectiveness.

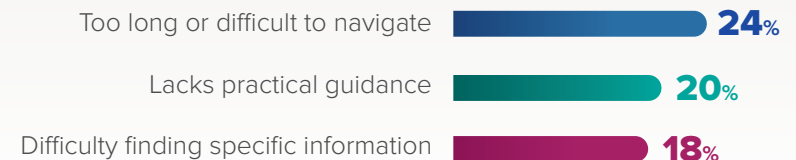
More depth raises the stakes for design

More effective codes tend to cover more ground. That makes it even more important to organize content in a way employees can navigate. As codes expand to address more risks, responsibilities, and resources, the challenge is making that added depth manageable.

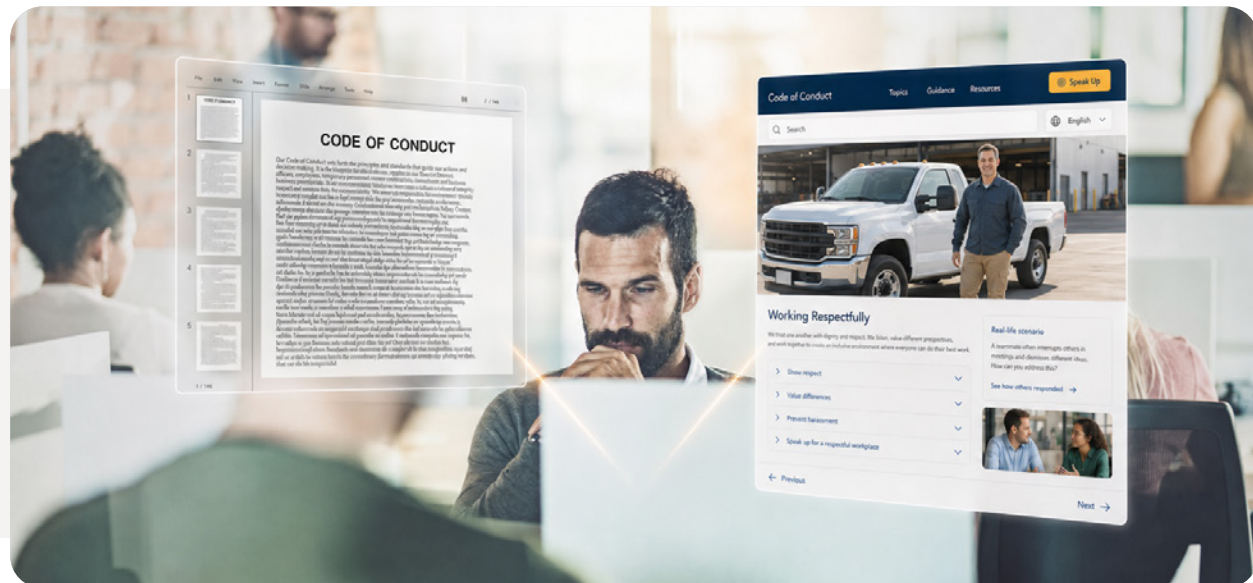
The employee survey shows where that tension can surface. Nearly 1 in 4 employees say their code is too long or difficult to navigate. Length is not the only challenge: About 1 in 5 say their code lacks practical guidance, while a similar share struggle to find the information they need. These findings do not directly tell us that more comprehensive codes cause those challenges, but they do show that employees can encounter friction when trying to find and apply guidance.

This matters because comprehensiveness is only part of the effectiveness story. A code can address a broad range of topics and still need to make that information manageable for employees. The goal is not to strip away useful content, but to make depth easier to navigate. Clear organization, intuitive navigation, and connections to supporting resources can help employees get to the guidance they need without asking the code to do less.

Where employees encounter friction with codes



Nearly 1 in 4 employees say their code is too long or difficult to navigate



The same code can land differently

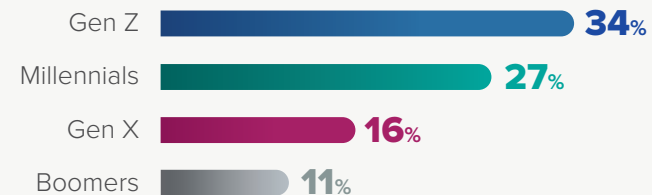
Employees do not experience the same code in the same way. According to the survey analysis, 34% of Gen Z employees say their code is too long or difficult to navigate, compared with 27% of Millennials, and 16% of Gen X employees. Among Boomers, the number falls to roughly 1 in 10. Difficulty finding information follows a similar pattern, with Gen Z employees reporting the challenge about three times as often as Boomers.

Access also varies depending on employees' circumstances, including language and work arrangement. 80% of employees whose first language is not English say the code is available in their native language. Across work arrangements, most employees know how to access the code, although remote employees report somewhat lower levels of awareness than their hybrid and in-office counterparts.

These differences do not tell us why employees experience the code differently, but they do show that there is no single employee experience of the code. Looking at usability across different parts of the workforce can help organizations identify where employees may need easier access, navigation, or support.

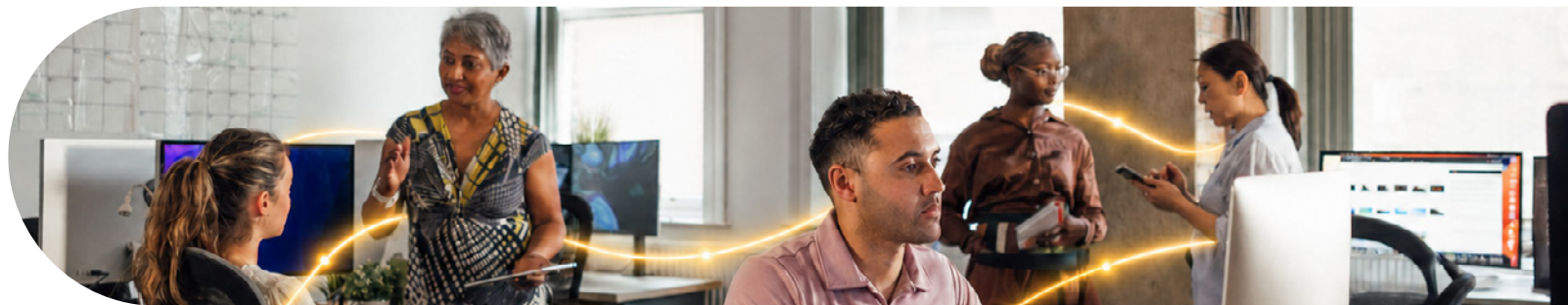
Younger employees report more navigation challenges

Percent who say their code is too long or difficult to navigate



Source: Employee Survey (2026)

80% of employees whose first language is not English say the code is available in their native language



Effectiveness is a balance

The 2026 findings point to a more nuanced view of code effectiveness. Higher-scoring codes tend to be more comprehensive, while the employee survey separately shows that length and navigation remain common usability concerns. At the same time, employees do not all experience that complexity in the same way.

The goal, then, is not simply a shorter code or a longer one. It is a code with enough substance to address the issues employees face, supported by design and practical guidance that make that substance manageable.

That idea is consistent with the [2025 Code of Conduct Report](#), which evaluated effective codes across eight dimensions—including risk topics, knowledge reinforcement, usability, and look and feel—rather than treating any single feature as the measure of a strong code.

And it provides a connection to the broader culture story. LRN's [2024 Benchmark of Ethical Culture](#) defines ethical culture through a much wider set of factors, including leadership modeling, psychological safety, organizational justice, trust, incentives, transparency, and E&C program impact. The code is one part of that broader environment. The 2026 findings suggest that organizations can strengthen that part by focusing on both what the code contains and how employees experience it.

The goal is not simply a shorter code or a longer one. It is enough substance, made manageable.



RECOMMENDATIONS FOR BALANCING SUBSTANCE AND USABILITY

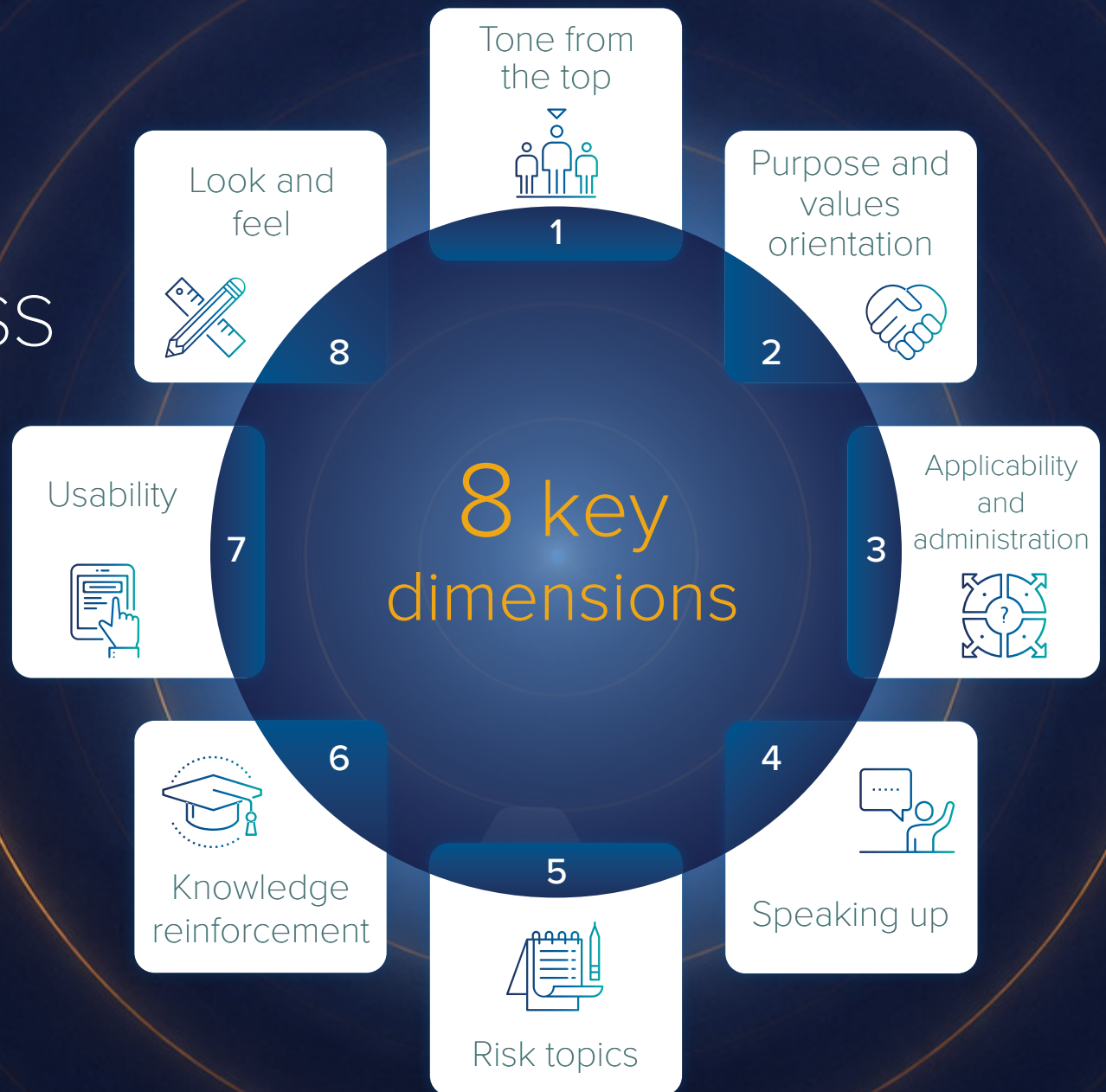
- **Design for depth, not length.** Include the content employees need, but use clear structure, concise language, and strong navigation to keep added depth manageable.
- **Test usability across the workforce.** Look beyond overall averages to understand how different generations, work arrangements, languages, and employee groups experience the code.
- **Use the code as a “front door” to deeper resources.** Keep essential guidance in the code and connect employees to policies, training, and other resources when more detail is needed.
- **Evaluate effectiveness from more than one angle.** Consider content coverage alongside readability, navigation, usability, and employee feedback rather than relying on any single measure of code effectiveness.



Conclusion

The 2026 findings point to a clear shift in what organizations should expect from a code of conduct. For most companies, simply having a code is no longer the challenge: Access is widespread, acknowledgment is well established, and traditional compliance topics are firmly covered. The opportunity now is to make the code a resource employees can turn to when they need guidance. That means looking beyond what the code contains to how employees experience it – whether it is easy to find, navigate, understand, and apply. It also means keeping pace with emerging risks such as AI without adding unnecessary complexity, and reinforcing the code through training, manager conversations, leadership communication, and trust around speaking up. Ultimately, achieving effectiveness requires a balance. The goal is not simply a shorter or longer code, but one with enough substance presented in a way employees can easily navigate and use. As organizations update their codes for new risks and a changing workforce, the focus should remain on making guidance clear, relevant, and practical for the employees it is designed to serve.

Eight dimensions of code effectiveness





The code should include a message from the organization's chief executive officer or another leader that is brief, unique, inspiring, and connected to values and business performance.



The code should apply to all employees, officers, directors, and contractors and should state that leaders have added responsibilities related to ethics and compliance. The code should provide an overview of the ethics and compliance program and the investigations process. It should also clearly explain the consequences of violating the code.



The code should connect to the organization's purpose, values, and business. The code should explain how it heightens risk awareness, enhances decision-making, and helps strengthen culture. The code should have a distinct theme that runs throughout the document.



The code should identify multiple resources for seeking guidance, raising concerns, and reporting potential violations. The code should clearly address confidentiality, anonymity, and non-retaliation.

5



Risk topics

The code should address a comprehensive range of risk topics, consistent with the organization's industry and operations. The business rationale for each topic should be clearly explained.

Usability



7

The code should be structured in a clear and logical way and should use that structure consistently. Readers should be able to quickly find or navigate to the information they need. Essential principles and behavioral guidance should be clearly highlighted. The writing style should be clear, concise, direct, and understandable to all employees and stakeholders.

6



Knowledge reinforcement

The code should include scenario-based Q&A's, a decision-making model, multi-media elements, and links to company policies.

Look and feel



8

The code should be inspiring, engaging, and look like the organization. It should use images, graphics, text callouts, bullet lists, and judicious use of white space to enhance the reader experience.

Methodology

Employee survey

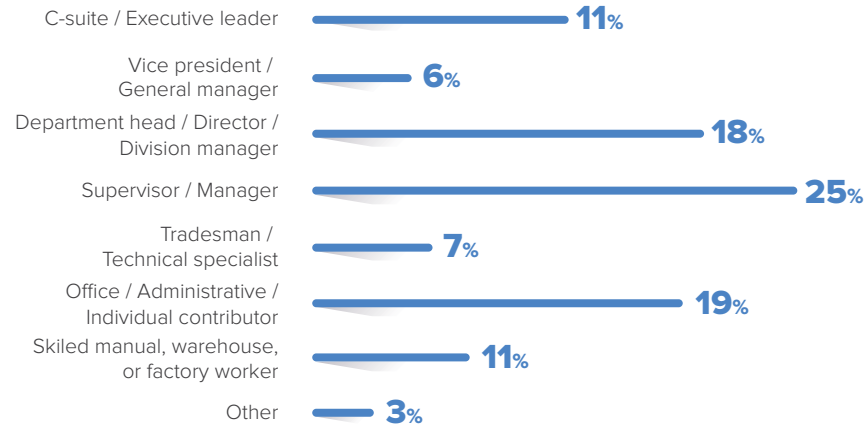
LRN partnered with Sago, a leading global research partner, to conduct a comprehensive survey on employee use of codes of conduct. The survey builds on the employee research included in LRN's prior Code of Conduct reports and earlier validation work from the 2021 and 2024 *Benchmark of Ethical Culture reports*. Previously validated through the LRN Ethics & Compliance Culture Assessment, the survey questions cover characteristics of ethical culture and employee engagement with codes of conduct, informed by LRN's research and frameworks on ethics, culture, leadership, values, and compliance.

The data published in the 2026 *Code of Conduct Report* was collected from 2,000 full-time employees, spanning individual contributors to the C-suite across 16 industries and 15 countries. Respondents represent Asia-Pacific, Europe, North America, and South America. The study was provided in 11 languages: English, Brazilian Portuguese, Chinese (Simplified), Dutch, Canadian French, French, German, Japanese, Latin American Spanish, Polish, and Swedish. Quota sampling methodologies were used to provide broad representation across the survey sample.

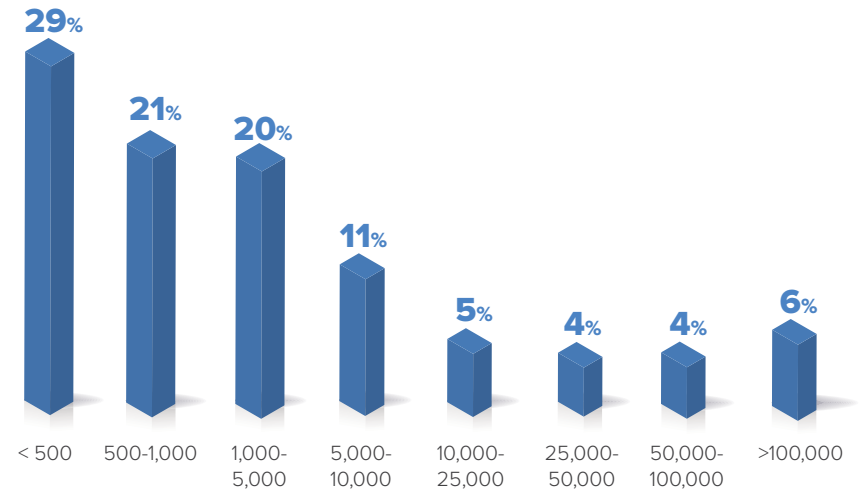


Participant demographics

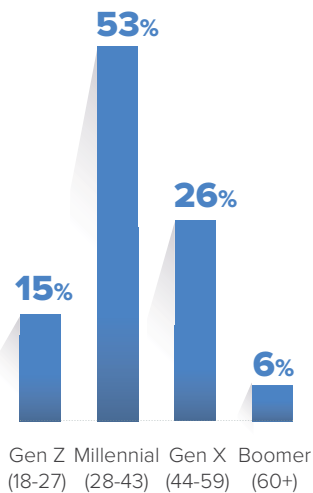
Title



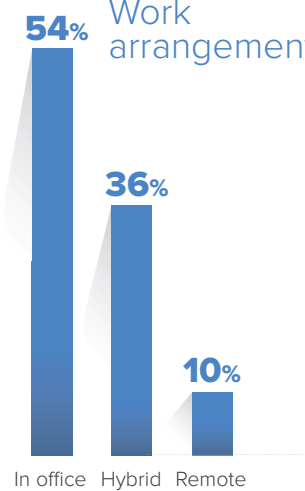
Company size (# employees)



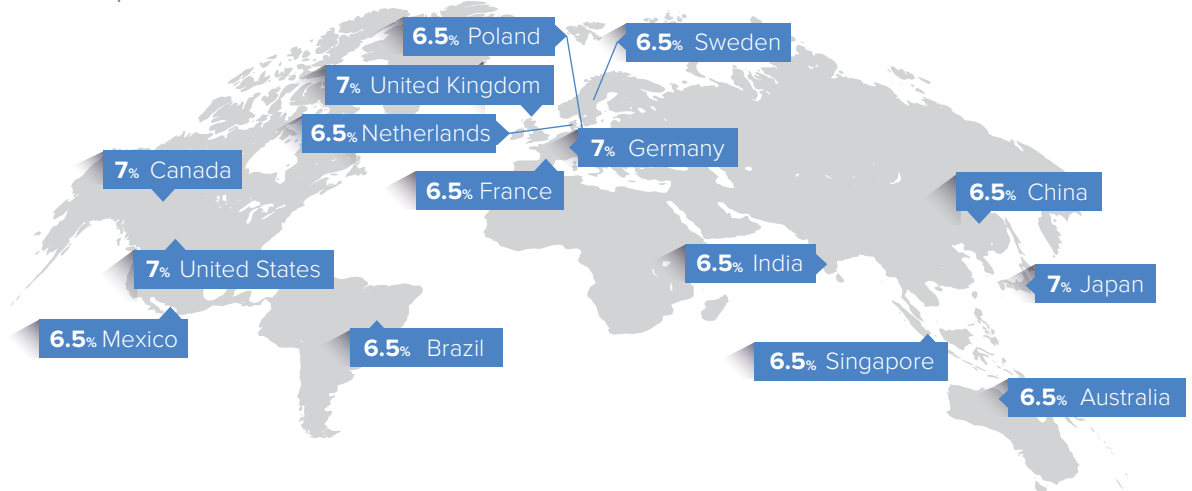
Generation



Work arrangement

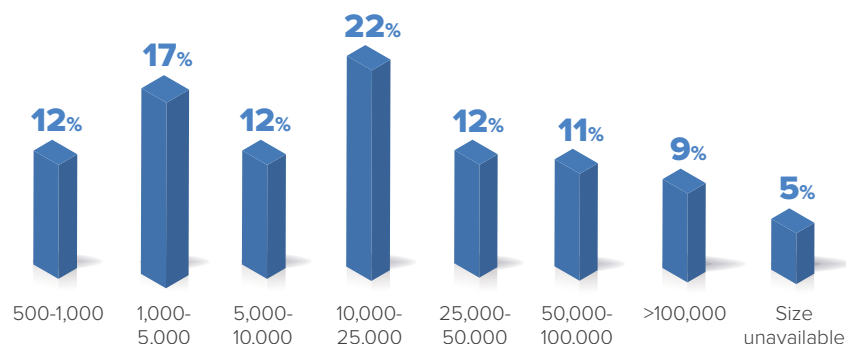


Participant location

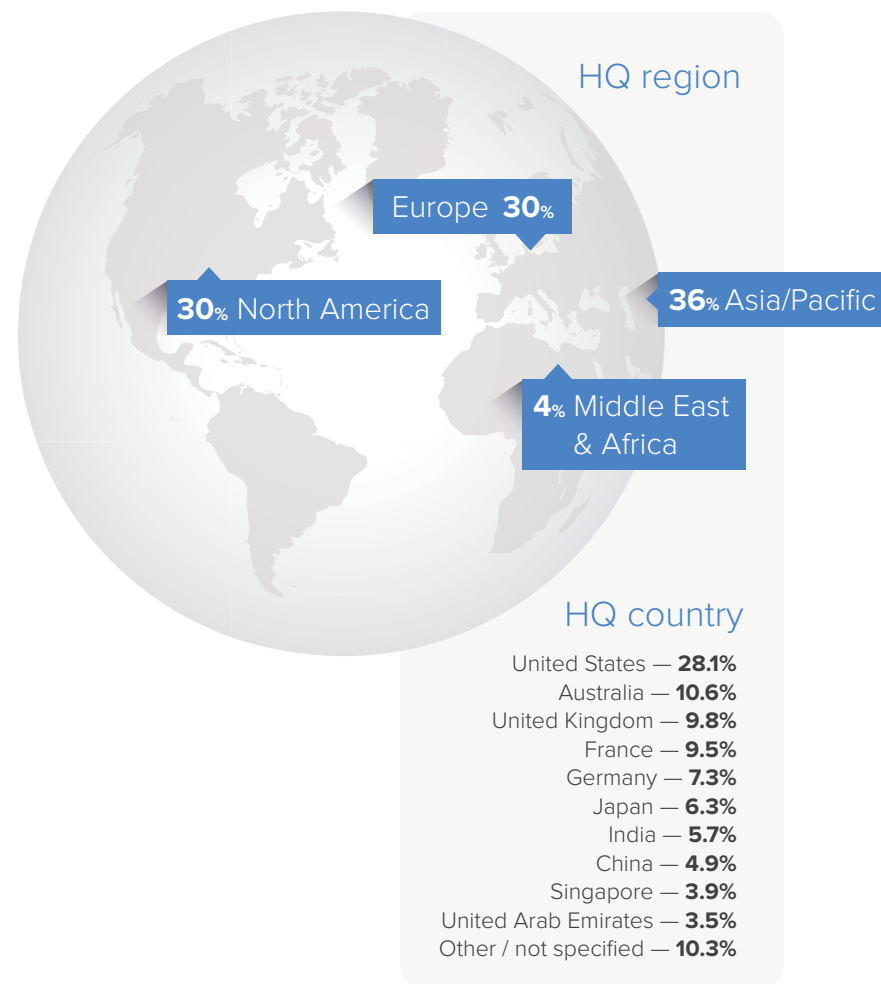
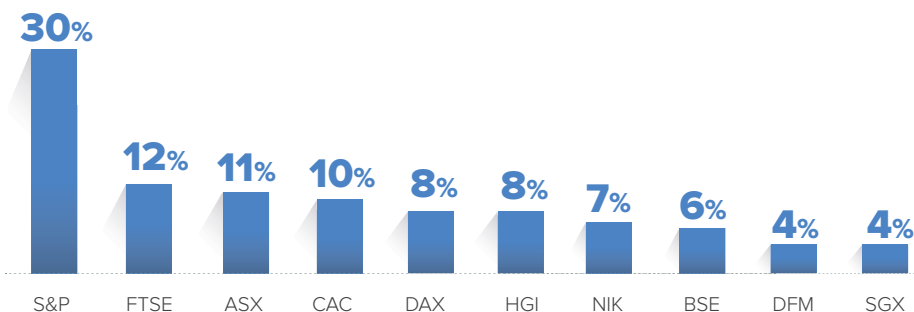


Company demographics of the code analysis

Company size (# employees)



Primary listing



Code analysis

For the 2026 Code of Conduct Report, LRN used an artificial intelligence tool to analyze over 1,000 codes of conduct from organizations across ten major stock exchanges and four global regions. The analysis examined code of conduct elements and risk topics using criteria based on LRN's proprietary Code of Conduct Assessment framework and the eight dimensions of code effectiveness outlined in this report. The underlying analysis includes all of the codes in the overall benchmark.

NOTE: The 2026 code analysis is a current-state benchmark based on over 1,000 analyzed codes. Because the sample and methodology differ from prior Code of Conduct Reports, code-content percentages should not be interpreted as year-over-year changes.

Appendix

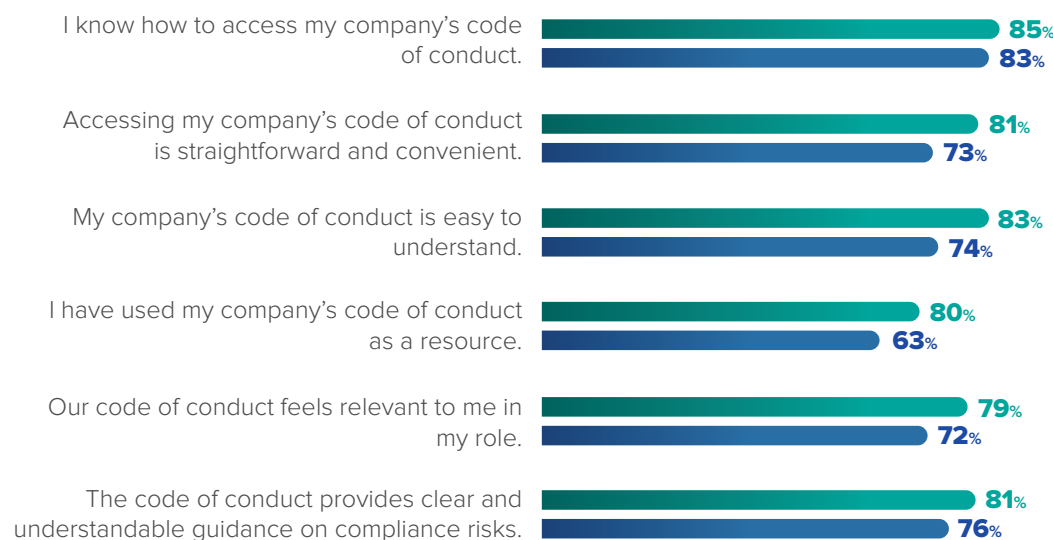
The following charts highlight additional findings from our Code Analysis and Employee Survey. These data points can help you identify opportunities to improve the effectiveness of your code of conduct and strengthen your organization's ethical culture.

EMPLOYEE SURVEY DATA

Code access, usage, and impact

Percent agree

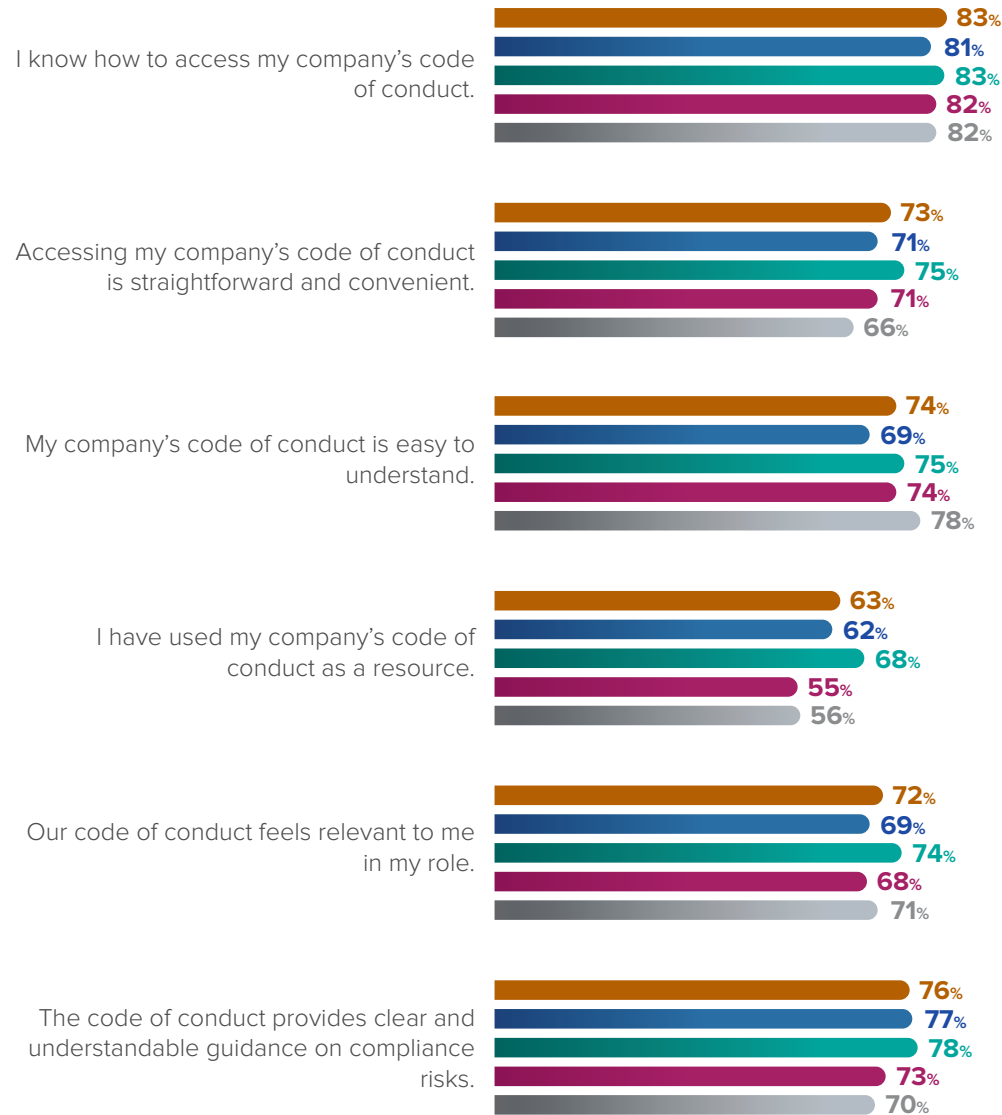
● 2025 ● 2026



Code access, usage, and impact by generation

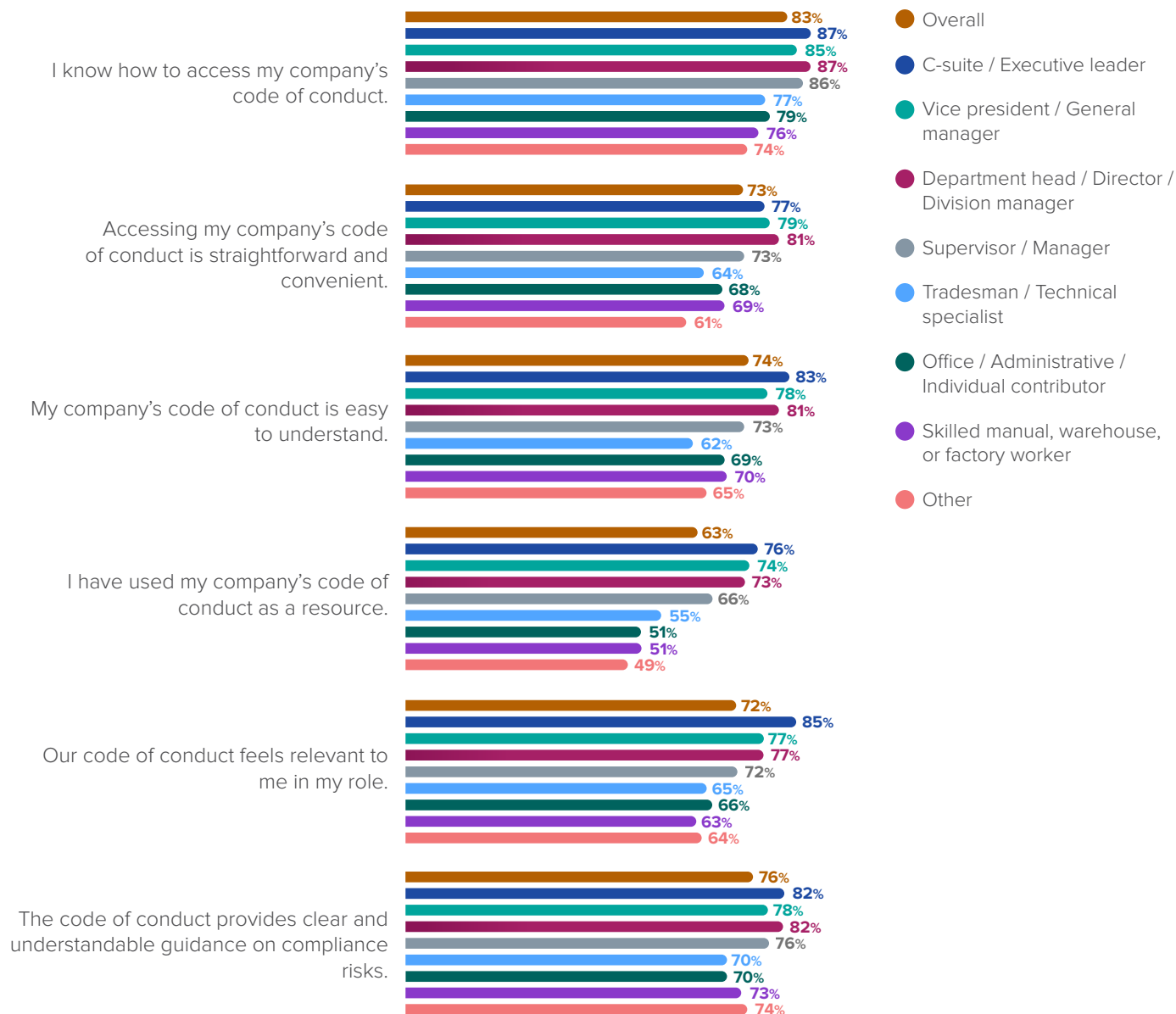
Percent agree

● Overall ● Gen Z ● Millennial ● Gen X ● Boomer



Code access, usage, and impact by job title

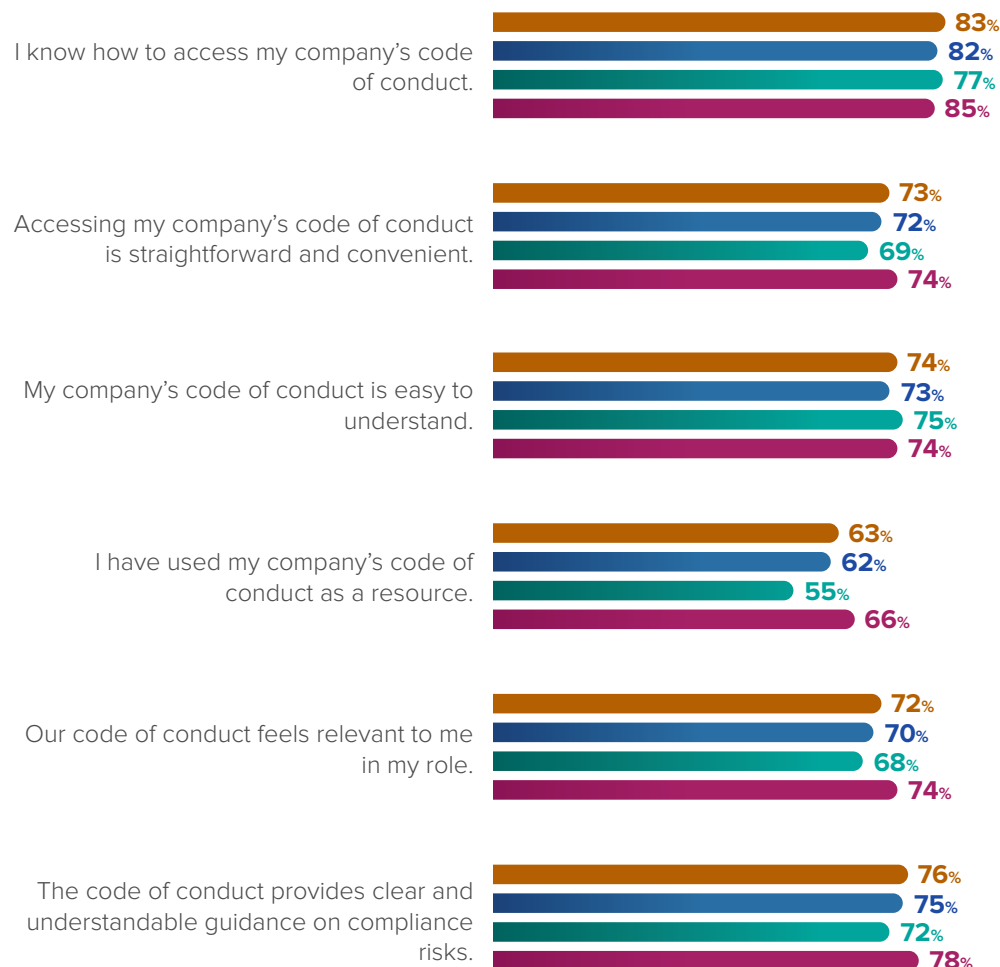
Percent agree



Code access, usage, and impact by work arrangement

Percent agree

● Overall ● In office ● Remote ● Hybrid



Reporting and retaliation

Percent agree

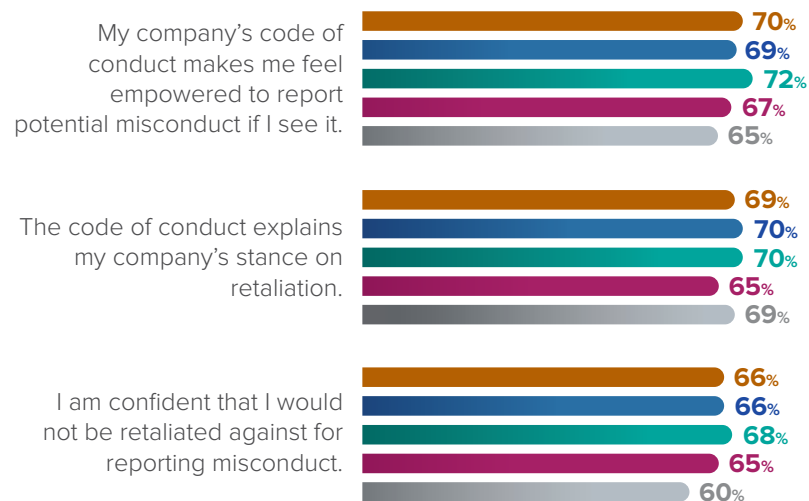
● 2025 ● 2026



Reporting and retaliation by generation

Percent agree

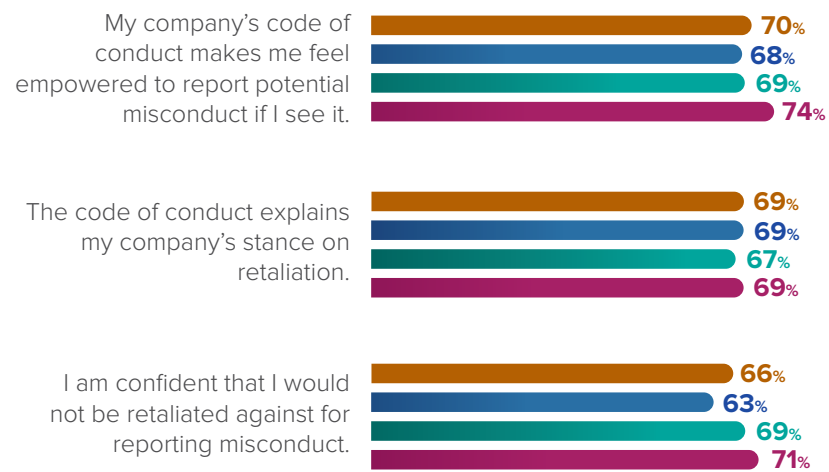
● Overall ● Gen Z ● Millennial ● Gen X ● Boomer



Reporting and retaliation by work arrangement

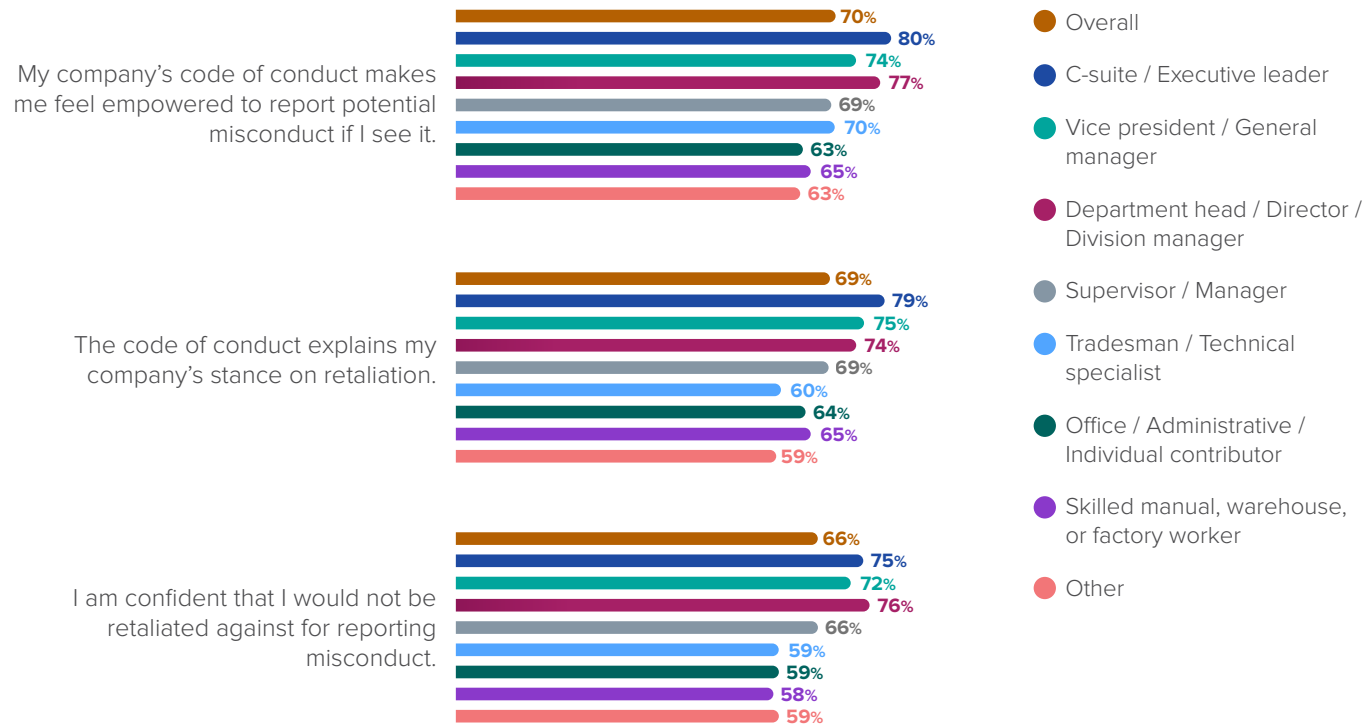
Percent agree

● Overall ● In office ● Remote ● Hybrid



Reporting and retaliation by job title

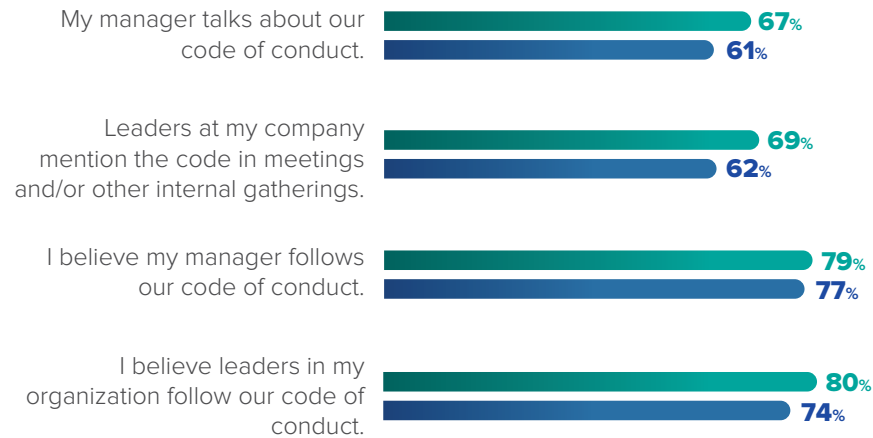
Percent agree



Leadership communication and conduct

Percent agree

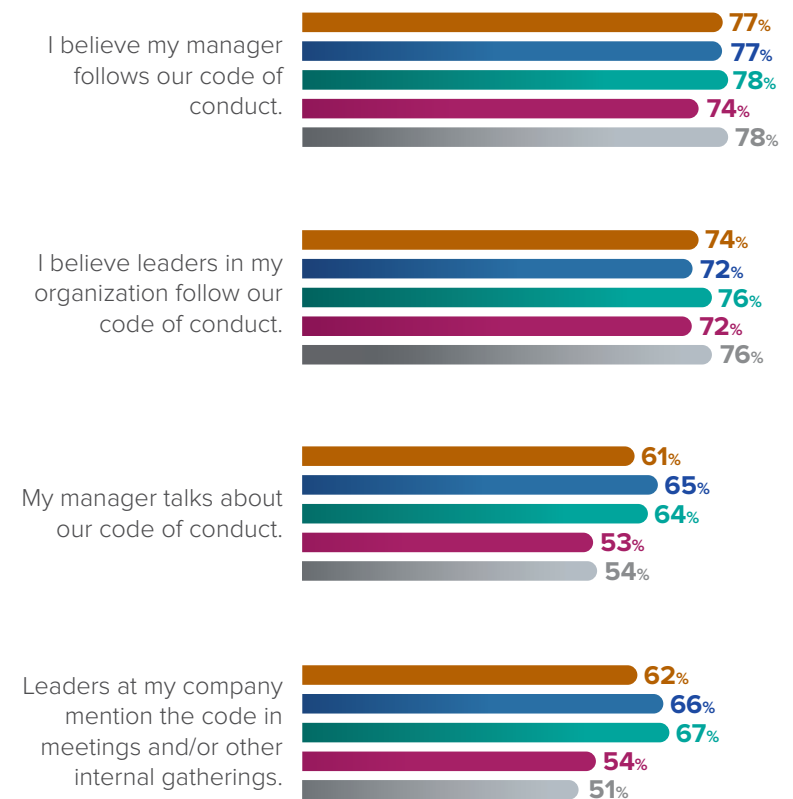
● 2025 ● 2026



Leadership communication and conduct by generation

Percent agree

● Overall ● Gen Z ● Millennial ● Gen X ● Boomer



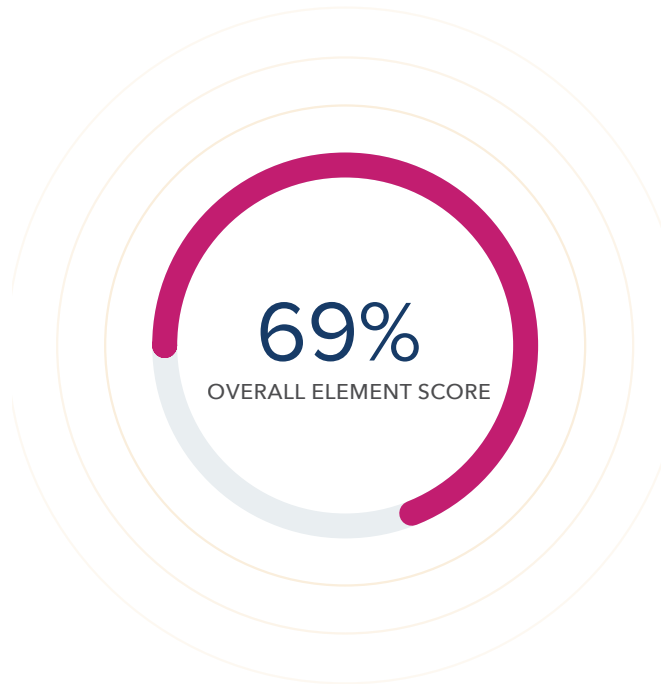
Reporting and retaliation by work arrangement

Percent agree

● Overall ● In office ● Remote ● Hybrid



Code elements included – overall



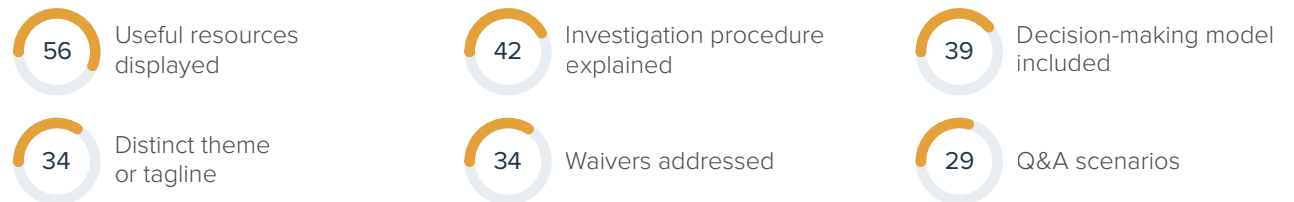
WIDELY ESTABLISHED · 80-100%



MODERATELY ESTABLISHED · 60-79%



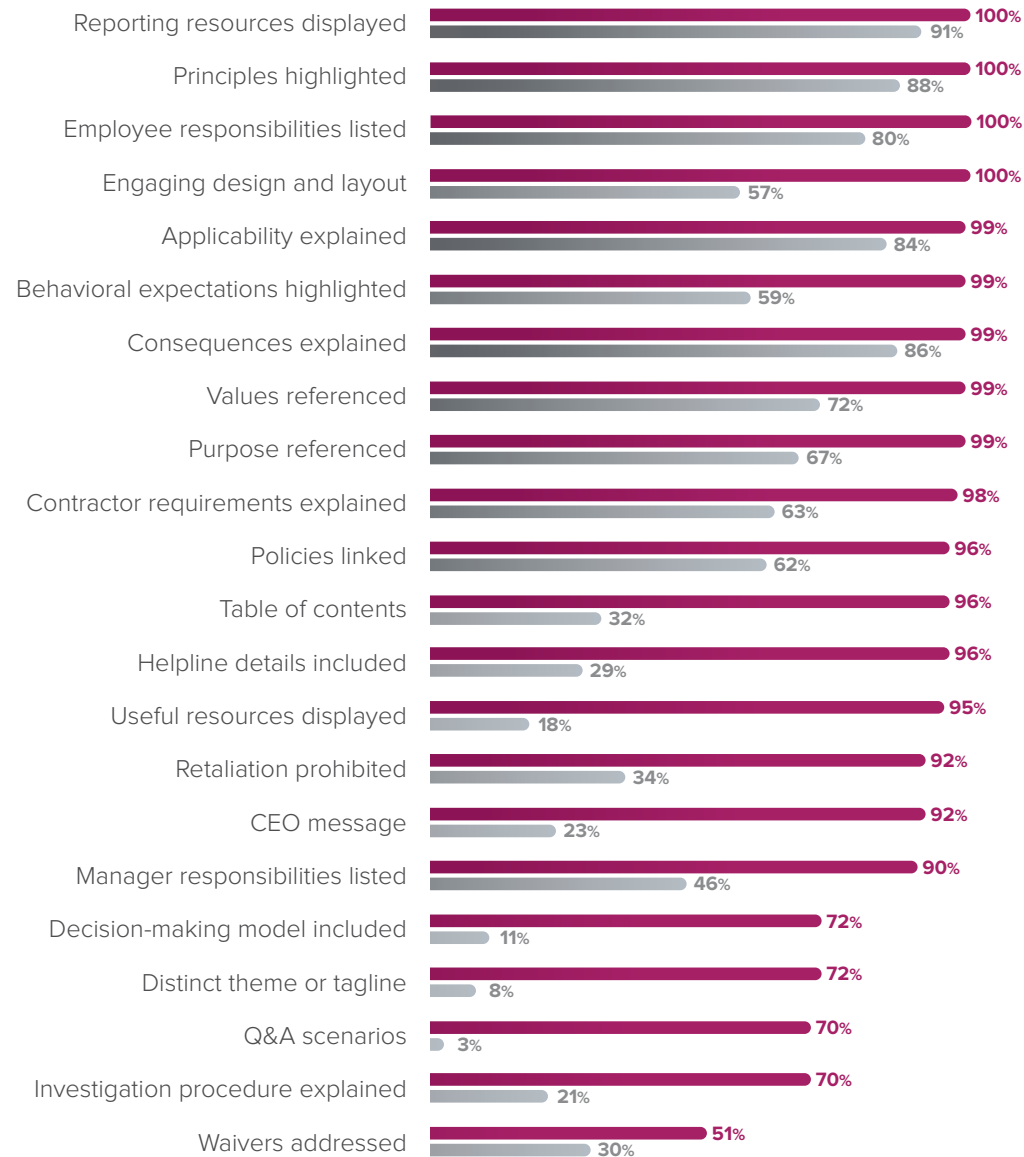
LESS COMMONLY INCLUDED · BELOW 60%



Code elements: More effective vs less effective

Percent present

● More effective ● Less effective



Code elements included – by region

Percent present

	● OVERALL	● APAC	● EUR	● NA	● MEA
Reporting resources displayed	97%	94%	96%	100%	100%
Principles highlighted	96%	91%	100%	96%	96%
Applicability explained	94%	89%	96%	97%	96%
Consequences explained	92%	89%	89%	98%	100%
Employee responsibilities listed	92%	85%	94%	98%	98%
Values referenced	89%	86%	94%	87%	90%
Purpose referenced	85%	76%	92%	88%	86%
Contractor requirements explained	84%	80%	91%	84%	78%
Behavioral expectations highlighted	83%	80%	86%	85%	80%
Engaging design and layout	83%	80%	87%	81%	84%
Policies linked	80%	74%	79%	88%	80%
Manager responsibilities listed	68%	59%	72%	74%	80%
Table of contents	66%	53%	78%	70%	70%
Retaliation prohibited	62%	51%	55%	84%	56%
Helpline details included	62%	41%	61%	88%	58%
CEO message	61%	42%	77%	68%	52%
Useful resources displayed	56%	39%	62%	73%	40%
Investigation procedure explained	42%	27%	37%	64%	44%
Decision-making model included	39%	29%	40%	50%	46%
Distinct theme or tagline	34%	24%	34%	49%	24%
Waivers addressed	34%	20%	8%	78%	26%
Q&A scenarios	29%	15%	30%	46%	12%

Risk topics covered – overall

Risk (% present)

● 90–100% Nearly universal

● 80–89% Widely addressed

● 60–79% Moderately addressed

● Below 60% less common



Conflicts of interest



Confidential and proprietary information



Bribery and corruption



Gifts and entertainment



Company assets



Discrimination



Harassment



Third party management



Privacy and data protection



Insider trading



Health and safety



Financial records and reports



Information security



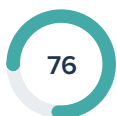
Competition antitrust



Environment



Intellectual property



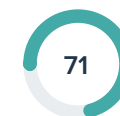
Fraud



Inclusion and belonging



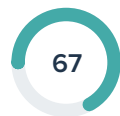
Records management



Political activities



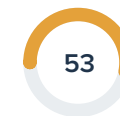
External inquiries



Human rights



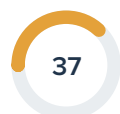
Social media



International trade



Labor practices



Security



Competitive intelligence



Artificial intelligence

Risk topics covered – by code effectiveness

Risk (% present)



Risk topics covered – by region

Risk (% Present)

	● OVERALL	● APAC	● EUR	● NA	● MEA
Conflicts of interest	98%	98%	97%	99%	100%
Confidential and proprietary information	97%	99%	93%	99%	100%
Bribery and corruption	96%	95%	97%	96%	92%
Gifts and entertainment	93%	92%	93%	95%	96%
Company assets	92%	93%	84%	98%	94%
Discrimination	91%	90%	93%	91%	90%
Harassment	91%	91%	91%	90%	88%
Third party management	90%	84%	93%	93%	90%
Privacy and data protection	87%	86%	90%	86%	94%
Insider trading	87%	87%	79%	95%	92%
Health and safety	87%	88%	87%	86%	76%
Financial records and reports	83%	79%	77%	97%	74%
Information security	83%	79%	85%	83%	92%
Competition antitrust	83%	75%	88%	90%	54%
Environment	78%	77%	87%	74%	62%
Intellectual property	76%	74%	69%	86%	82%
Fraud	76%	75%	68%	85%	74%
Inclusion and belonging	75%	70%	83%	75%	68%
Records management	75%	69%	66%	92%	74%
Political activities	71%	61%	76%	82%	48%
External inquiries	70%	71%	61%	78%	78%
Human rights	67%	60%	85%	59%	58%
Social media	60%	56%	56%	67%	68%
International trade	53%	36%	61%	67%	36%
Labor practices	51%	40%	64%	52%	56%
Security	37%	28%	30%	52%	44%
Competitive intelligence	36%	22%	31%	58%	26%
Artificial intelligence	9%	6%	9%	14%	4%

Is your Code clear, engaging and culture driven?

Our Advisory experts can help you create a best-in-class Code report that improves E&C program effectiveness.

Find out how.

