

Gowen The Ethical Way 2019: GowenPlaces

Geoffrey Owen

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Code of Ethics

GowenPlaces follows a guiding principle that businesses should be both profitable and socially responsible. GowenPlaces complies with all applicable laws in regions where its services are offered. Following the law is mandatory, but compliance is not enough: GowenPlaces pursues the establishment of beneficial and realistic ethical principles and practices, both internally and externally.

Every GowenPlaces employee strives to embody the company's values and mission in all actions they undertake and assumes this responsibility as part of their duties. We believe these values are a key factor in the quality and integrity of our services. Embodying these values means acting in the interest of GowenPlaces as well as those of our stakeholders. We, therefore, expect all our employees to apply these values in carrying out their day-to-day work.

All GowenPlaces employees are encouraged to understand, participate in, and live by the Code of Ethics, which is a fundamental part of the Company's culture. The Code of Ethics establishes the framework for its values and best practices. Employees are provided with training and development opportunities to maintain an up-to-date awareness of any changes to the Code of Ethics.

Wherever they are located and whatever role they fill, all GowenPlaces employees are encouraged to carry out their duties with the following principles in mind:

Honesty: to act transparently and with uncompromising integrity, the Company always endeavors to establish trustworthiness

Ownership: to be accountable to the actions of the Company and employees, GowenPlaces fosters a workplace culture of involvement, engagement, and responsibility

Improvement: to sustain and enhance GowenPlaces market influence by implementing solutions which follow a path of continuous improvement and growth

Collaboration: to create added value by putting team success ahead of individual gain, GowenPlaces firmly believes we are each other's best resource

Inclusion: to act as stewards of socially responsible behavior, the Company and employees respect the individual choices of others and strive to build a more diverse and inclusive culture

Customer Evangelism: to be a driven and customer focused Company, every decision considers the customer's experience as a key factor to lasting success

This Code of Ethics describes the core values for GowenPlaces ongoing success. Employees use the Code of Ethics to guide their decisions both inside and outside the office, where permitted by applicable law.

Gowen The Ethical Way – 2019: GowenPlaces Ethics Program

Standards and Procedures: Code of Conduct

GowenPlaces believes professional standards and procedures apply to every employee, and they are expected to follow the Code of Conduct regardless of race, nationality, gender, age, disability, or individual trait.

1) GowenPlaces does not tolerate bribery

- Accepting, submitting, or being complicit to an act of bribery is considered unacceptable behavior. (e.g., taking a bribe for promoting an employee)
- Attempting to influence or obtain favorable results by employing the use of incentive-based decision making to eliminate or obfuscate business or legal obstacles is considered unethical and will not be tolerated. (e.g., giving non-approved gifts to sway a customer)

2) GowenPlaces believes in fair competition

- Using the Company's intellectual property to increase the profitability of investments is considered insider trading and shall not be tolerated. (e.g., using the company roadmap to influence personal investment decisions)
- The Company and its employees will uphold applicable laws and regulations to maintain fair competition practices.

3) GowenPlaces protects its intellectual property

- Employees are expected to protect intellectual property by only using Company property for business purposes.
- Employees shall only disclose information to entities who have the right or privilege to access or receive this information.

4) GowenPlaces resolves conflicts of interest

- Engaging in any other activity which directly conflicts with the services or products GowenPlaces offers is considered an unacceptable conflict of interest.
- Personal relationships shall not interfere with the ongoing business of GowenPlaces

Training Program: Ethical Decision-Making Training

GowenPlaces understands individuals come from diverse backgrounds and hold unique perspectives when it comes to ethical dilemmas. We offer a collaborative and comprehensive training program to new employees and existing employees, which align closely with our Code of Ethics and Code of Conduct. Our primary training method involves group exercises and role-playing ethical scenarios; however, most of the ethical training comes from studying the Code of Ethics and Code of Conduct.

Training Program Objective(s): All employees are encouraged to adopt the Code of Ethics and Code of Conduct to foster an environment of collaborative, ethical decision making.

Frequency of Training: All Employees receive new hire training and are given the opportunity to participate in ongoing training sessions.

- New hires receive a copy of the Company's Code of Ethics and Code of Conduct on "day-one" and directed to study the contents. At the end of week 1, they will be asked to complete a 25 question, multiple choice survey designed to help the instructors identify ethical inconsistencies, learning opportunities, and develop plans for quarterly check-ins.
- All employees receive quarterly check-ins with their Instructors, reinforcing the Code of Ethics and Code of Conduct by discussing their understanding of ethical decision making and how it applies to their roles.
- All employees participate in monthly guided group exercises lead by their Instructor.
- All employees participate in monthly 1-on-1 role-playing scenarios collaboratively planned during their quarterly check-ins with their Instructor.
- All employees are expected to receive a 25/25 passing score after six months of hire.

Location of Training: Ethical Decision-Making training will take place at the Seattle Office, in Conference Hall Alpha.

Instructors: The Senior Compliance Officer will appoint Instructors to a six-month review cycle, based on their adoption and passion for encouraging others to follow the Code of Ethics and Code of Conduct. The Senior Compliance Officer will take the role of Instructor for the first six-month cycle and upon completion of the quarterly reviews, they will appoint their first Instructor.

- Employees who did not receive a 25/25 passing score after six months of hire are not eligible to be appointed as Instructors. However, they will be eligible to take the test on a quarterly basis. Upon a successful passing score, they are eligible during the next cycle.

Training Program: Addressing Misconduct

Asset Protection: Hardware, software, and intellectual property tracking mechanisms are in place to protect the Company's assets and mitigate risks of internal and external misconduct.

- The Senior Compliance Officer will develop and maintain a database of hardware assets assigned to employees and collect these assets upon employee departure from the Company.
 - With leadership approval, the Senior Compliance Officer may hire a Database Administrator to manage the Company's hardware assets.
- The Senior Compliance Officer will assign and revoke software assets/licenses for employees through separate software tracking and management system.
 - With leadership approval, the Senior Compliance Officer may hire a System Software Configuration Manager to administer the Company's software assets.

- The Senior Compliance Officer will identify potential security vulnerabilities and identify/implement technologies to mitigate damage from the loss of Company property.
 - This responsibility will be shared with the Chief Technology Officer.

Asset Protection- Misconduct Identification: The Senior Compliance Officer and the Chief Technology Officer will work together to implement technologies designed to aid in their investigation of improper use of Company assets (e.g., hardware, software, intellectual property)

- Asset Protection systems in place will identify employee hardware and software assignments through standard database management methodologies.
 - If an employee does not return their equipment upon their departure, their final paycheck may be reduced based on the cost of a like-replacement device, and the non-returned device will be remotely wiped by the database system and software licenses/assets re-assigned.
- Intellectual Property will be protected using role-based access control technologies to assign access rights based on the employee's role or function with the Company.
 - If an employee violates the Code of Ethics or Code of Conduct pertaining to Intellectual Property, the Senior Compliance Officer and Chief Technology Officer will investigate ethical, legal, and other concerning effects of the violation and act accordingly.

Reporting Employee Misconduct: If employee misconduct is observed, communicate your findings directly to the Senior Compliance Officer and await further instruction.

- If an employee identifies the misconduct of another employee, they are encouraged to tell the Senior Compliance Officer of the findings in-person rather than deal with the issue themselves.
 - The Senior Compliance Officer records the misconduct report and begins an investigation into the violation and takes action if a violation occurred.

Training Program: Continuous Improvement Auditing

GowenPlaces is committed to improving the ethical standards and principles of the Company and its employees by reviewing and auditing the Code of Ethics and Code of Conduct and training program on an ongoing basis. Our Instructor(s) are responsible for reporting feedback about our Ethics Program directly to the Senior Compliance Officer. After analyzing trends and reviewing existing policies, the Senior Compliance Officer will use these reports to adjust the Code of Ethics, Code of Conduct, and training program structure to better align with employee feedback and industry standards.

Measuring Effectiveness: GowenPlaces uses the 25-question multiple-choice survey to measure the effectiveness of the Ethics Program as a whole.

- The percentage of the number of employees receiving a passing score is directly correlated to the successful implementation of the program.

Feedback Tools: Employee feedback provided during quarterly reviews and 1-on-1 roleplaying with their Instructors will be forwarded to the Senior Compliance Officer after the Instructor vets the feedback for useful information. Instructors are the primary auditors of the Ethics Program because they receive feedback from employees and compile reports for further review.

- Instructors are encouraged to seek out additional survey -style feedback tools and forward them to the Chief Technology Officer for review and approval before submitting them to the Senior Compliance Officer for implementation.

Frequency of Auditing: Due to the nature of our auditing mechanisms and continuous improvement built into the fabric of the program, the frequency is considered continuous as well.

- The Senior Compliance Officer may increase or decrease the frequency of which group exercises, reviews, and 1-on-1 sessions occur based on the percentage of employees who have passed the 25-question assessment.

Audit Facilitators: Instructors (see Feedback Tools) are responsible for providing feedback to the Senior Compliance Officer.

Implementation of Changes: The Senior Compliance Officer may update the Ethics Program using feedback from Instructors or feedback from employees who have reported misconduct.

- Senior Compliance Officer will forward all changes to the Ethics Officer for the immediate writing of an updated Code of Ethics, Code of Conduct, or updates to the training program.

Communication of Changes: GowenPlaces is committed to transparency and ensuring employees are provided with an up-to-date awareness of any changes to the Company's Ethics Program. The Senior Compliance Officer will send company-wide communications through multiple channels (email, message board) detailing any updates made to the program with a method for receiving immediate feedback through said channel. Changes will also be discussed during group exercises, reviews, and 1-on-1 sessions. Please contact your Instructor with further questions.