

## **UH Law Center debuts first database of Fortune 500 company codes of conduct**

Oct. 9, 2014 – The University of Houston Law Center today released a searchable [database](#) that contains the compliance codes for Fortune 500 companies. The project was led by Houston attorney Ryan McConnell, an adjunct professor at the University of Houston Law Center. McConnell worked with a team of recent graduates and current students to develop the database, which covers 42 different topics.

“The free database allows any company to conduct benchmarking on virtually every compliance area covered in a code of conduct and to spot compliance trends within their industry,” McConnell explained.

“In addition to proactively building a program, when compliance failures occur, whether a foreign bribery violation or environmental issue, stakeholders – whether they are shareholders in a lawsuit or criminal investigators – frequently scrutinize the company’s compliance program. This database provides a powerful tool for anyone to evaluate the strength of a company’s compliance program, including subject matters addressed in the code and the organization’s core values.”

The Wall Street Journal has already dubbed the online tool as “catnip for compliance officers.” More than 2,000 hours have been devoted to maintaining and updating the database since McConnell began the project in 2010 with the assistance of Akin Gump associate Katherine Southard Frazier and UH Law Center web developers Ruth McCleskey and Baroness Adams.

McConnell is a former federal prosecutor who focuses his practice on corporate compliance issues, internal investigations and white collar criminal defense with the Houston firm of McConnell Sovany LLP. He has taught international corporate compliance and criminal procedure at the Law Center for several years. The project was an outgrowth of the compliance work McConnell does for his client, where he identified a lack of publicly available resources for companies to benchmark their programs.

Most recently, McConnell has noticed an increased focus on social media and security issues. Social media policies experienced a 150 percent growth in codes of conduct since 2011, increasing from 88 companies to 220 companies in the latest dataset. Privacy policies addressing the protection of personal identifying information is included in 350 company codes. Out of those companies, three mention safe harbor certification and only one mentions approval of its binding corporate rules. This is consistent, he said, with the notion that data privacy and data security are dynamic areas as companies evaluate the information they hold

and process to determine which of the two programs best suits their company. The number of companies with “whistleblower” policies more than doubled from 34 in 2011 to 71 in 2013.

The database was updated this year by the University of Houston's Business and Tax Journal, working with UH alumna Michelle Jee and several other UH students. Other current and former students who assisted with the project include Kevin Baker, Aaron Blair, Paula Bonavides, Shaun Cassin, Briana Deanne, Angeles Garcia, Elli McKean, Erin Mitchell, Charlotte Simon, Ashley Whittington, and Katherine Witty.

To access UH Law Center’s compliance database, go to <http://www.law.uh.edu/compliance/>.

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