



Aberrant Open-ISM™

---

## CODE OF ETHICS POLICY

---

Property	Description
Document Version	1.0
Status	DRAFT
Last Update	2022-03-25
Document Owner	Risk Management
Next Scheduled Review	

**PROPRIETARY**

Document Approvals		
Approver Name	Title	Date
???	???	???

Revision History			
Version	Date	Description of Changes	Revised by
1.0	2022-03-25	DRAFT	Aberrant

## TABLE OF CONTENTS

1	Purpose .....	4
2	Scope.....	4
3	Our objective.....	4
4	Core Principles .....	4
5	Adhering to principles.....	6
5.1	Decision Making.....	6
5.2	Employee Autonomy.....	6
5.3	Politics .....	6
5.4	Conflict of interests.....	6
5.5	Bad Behavior .....	7
6	Policy Violations .....	7
7	Reporting Unethical Behavior.....	7
8	Contact Information.....	8
9	Document RACI .....	8
10	License Information .....	9
	Appendix A: Code of Ethics Acknowledgment Form .....	10

## 1 PURPOSE

---

This policy is designed to provide decision makers with a framework that aligns business decisions with the common good. Collectively, the aggregate of everyone making morally sound decisions benefits the business and increases everyone's overall welfare.

## 2 SCOPE

---

This policy applies to everyone.

This policy should be confused with our Code of Conduct Policy. While the Code of Conduct Policy is derived from this policy, it differs in that it aims to provide more concrete guidance on things like social media use, or acceptable professional attire.

The Code of Ethics Policy provides the framework for the 'how' and 'why' of everything we do. It applies directly to the design of our processes, our compensation model, our corporate strategy. It applies to everything.

## 3 OUR OBJECTIVE

---

Our paramount goal is to increase the welfare of our customers. Customer satisfaction is the ultimate metric of our success in this regard. Building the best product drives revenue and results in increased market-share. By satisfying our customers we are implicitly also maximizing the welfare of the company.

Of course building the perfect product is a Sisyphean task given the mercurial nature of the market. Think of optimizing customer satisfaction as the lodestar that guides our purpose.

## 4 CORE PRINCIPLES

---

The principles that underlie this policy are simple and impact everything we do. Our core principles can be thought of as the 'means' to our end.

1. **Honesty.** The foundation of trust is honesty. Honesty is also essential for effective communication. Honesty is the cornerstone of all other principles.
2. **Transparency.** Lies of omission depend on opacity. Transparency is at its heart a design principle. We should strive toward transparency in everything we do: systems, process design, pricing, contracts, etc.

3. **Trust.** We operate and make decisions in a world with imperfect information. Information asymmetry pervades everything we do. Giving co-workers, clients, vendors the benefit of the doubt prior to arriving at judgement is crucial to maintaining functional work relationships. Trust is also a crucial component of delegation.
4. **Diversity.** Diversity is a strength. It provides perspective and enables us to build better products for our customers. This applies to attributes that people can't change: e.g. race, culture, gender, and sexual orientation.
5. **Tolerance.** Tolerance is a key component in working productively with others. You should be indifferent to how other people express their freedom if it doesn't affect you directly. That said, it's unethical to be tolerant in the face of intolerance.
6. **Equality.** No one person is fundamentally better than anyone else. As a result, everyone deserves the same level of respect as everyone else.
7. **Empiricism.** You should be willing to question your own beliefs and be driven by reason instead of emotions. You should maintain an open mind and be willing to change your point of view based on evidence that is presented to you. Empiricism is another key design principle that allows us to incorporate the customer's voice in the direction of our product.
8. **Excellence.** We are collectively stewards of the business and by extension our investors' capital. As a guideline, we should aspire to be excellent in everything we do. We should prefer quality over expedience where it is a prudent investment. This principle applies equally to the automation of our system and our HR hiring practices. Less is more, excellence enables us to do more with less.
9. **Minimalism.** A minimally viable product is the shortest critical path to customer value. Minimalism is optimally nimble. As a guideline we should adopt an agile mindset that is driven by empirical customer data—this is the fastest way toward approaching optimizing customer welfare.

---

## 5 ADHERING TO PRINCIPLES

---

### 5.1 DECISION MAKING

---

Decision fatigue is real, everyone is limited to some degree in their ability to make consistent quality decisions over time. As a result, management should delegate decision making authority to members of the team that have the most relevant information to solve the problem at hand. As a manager, delegating decision making authority to members of your team that are closest to the problem is ultimately the most efficient way to complete work.

Pushing authority downwards as much as possible enables management to reduce decision fatigue and in the spirit of excellence make better decisions. Less is better.

### 5.2 EMPLOYEE AUTONOMY

---

Employees are adults and should be treated as such. Micromanagement of work, or group punishment should be roundly rejected by management.

It goes without saying that employees are the company's most important asset.

### 5.3 POLITICS

---

Politics in the corporate context can be viewed as an individual having goals that are out of alignment with the objectives of the company. An example of company politics might be a manager who is making decisions that preference his/her group over the welfare of the company. Political decisions are toxic and create a culture that can never optimize welfare.

The objectives of the company are the purview of executive management. Executive management should be focused on maximizing the welfare of the customer. Not being political is aligning to the mission of the executive and working to satisfy the customer.

### 5.4 CONFLICT OF INTERESTS

---

Notify your manager when you've identified an area where there may be conflicts of interest. Conflicts of interest have the potential to result in situations where the objectives of an individual or group are not aligned with the best interest of the company. Conflicts of interest might be process related or financial, or sometimes both—e.g. imagine a scenario where the CFO opts to forgo a third-party audit in order to perform the audit herself.

While it's not always possible to remediate conflicts of interest, we should make every effort to mitigate conflicts of interest through transparency.

## 5.5 BAD BEHAVIOR

---

Working with vendors that directly, or indirectly, support or enable racism, anti-Semitism, homophobia, or sexism would be tolerating intolerance. As a company, we should avoid working with vendors or customers that support points of view that are morally reprehensible.

In some cases, this logic extends to the whole country. As a matter of legal compliance we should avoid working with countries, or entities associated with countries, that are listed on the State Department's OFAC list.

## 6 POLICY VIOLATIONS

---

People make mistakes and should be given opportunities to change their behavior. As a guideline, management should use violations of the Code of Ethics Policy as a learning experience for employees. That said, there are some instances where management is constrained and must terminate employment as a result of policy violations. Some examples,

- Employee safety is a concern.
- The security of assets or information entrusted to the company is jeopardized.
- An employee or contractor violated the law or committed a serious felony.

## 7 REPORTING UNETHICAL BEHAVIOR

---

Employees, third parties, and customers are encouraged to report unethical behavior when they encounter it. Reports of unethical behavior can be done in confidence with a manager or in a confidential manner. <<Company Name>> operates a culture where honesty and integrity are valued. Whistleblowers should never fear retaliation for reporting unethical behavior or organizational dysfunction.

## 8 CONTACT INFORMATION

---

Name of Security Program Owner

Title of Security Program Manager

Phone Number

Email

## 9 DOCUMENT RACI

---

<b>Responsible</b>	Assigned to do the work	Security Program Manager
<b>Accountable</b>	Final decision, ultimately answerable	ISM Governance Committee
<b>Consulted</b>	Consulted BEFORE an action or decision is taken (proactive)	Executive Management
<b>Informed</b>	Informed AFTER a decision or action has been taken (reactive)	Named Participants in this document Other parties affected by the change



## 10 LICENSE INFORMATION

---

This work is licensed under a Creative Commons Attribution-NonCommercial-No Derivatives 4.0 International Public License (the link can be found at <https://creativecommons.org/licenses/by-nc-nd/4.0/legalcode>)

To further clarify the Creative Commons license related to the Open-ISM™ content, you are authorized to copy and redistribute the content as a framework for use by you, within your organization and outside of your organization for non-commercial purposes only, provided that (i) appropriate credit is given to Aberrant, Inc., and (ii) a link to the license is provided. Additionally, if you remix, transform, or build upon the Open-ISM, you may not distribute the modified materials. Users of the Open-ISM framework are also required to refer to (<http://www.aberrant.io/open-ism/license>) when referring to the Open-ISM to ensure that users are employing the most up-to-date guidance. Commercial use of the Open-ISM is subject to the prior approval of Aberrant, Inc.

---

**APPENDIX A: CODE OF ETHICS ACKNOWLEDGMENT FORM**

---

The following form is required to be completed prior to an employee be onboarded by HR.

<b>Name of Employee / Contractor / Third Party</b>	
<b>Date of Hire</b>	
<b>Hiring Manager</b>	

I acknowledge that I have read the Code of Ethics Policy and understand adherence to this policy is a condition of my employment at <<Company Name>>. I also understand that violation of the Code of Ethics Policy may result in disciplinary action in the form of a reprimand, suspension, or termination.

<b>Signature</b>	
<b>Date</b>	