

Database of Fortune 500 Companies' Compliance Codes and Policies

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A database of compliance policies for Fortune 500 companies, launched by the University of Houston Law Center, should help companies that want to benchmark their protocols.

The [free database](#) contains the 2012 and 2013 policies at the largest companies. It covers a wide range of over 40 topics, including codes of conduct, whistleblower reporting, conflicts of interest, related person transactions, political activities, insider trading, export controls, intellectual property, money laundering, antitrust, social media, and numerous FCPA-related policies. It can be searched by company name and three types of policies, three companies across three types of policies or by SIC code.

According to its press announcement, social media policies have exploded since 2011, showing 150% growth with 220 companies reporting them in 2013, compared to 88 in 2011. During that same period, the number of whistleblower policies have doubled to 71 in 2013. In addition, almost 300 companies disclosed FCPA policies.

If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

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