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## Letter to the Editor: 'Code' offers framework to help companies avoid perils of dark money

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Larry Householder, former speaker of the Ohio House of Representatives, speaks during the Republican National Convention in Cleveland on July 18, 2016.

Your <u>March 13 editorial</u> ("Out of the darkness") tying the recent Larry Householder guilty verdict to the perils that companies face from "dark money" political spending hit the bullseye. This verdict sends companies a strong warning about the perils of "dark money" political contributions.

It also should move companies to address that peril by adopting a framework for approaching, governing and evaluating the risk of their political spending. Such a framework is laid out in the CPA-Zicklin Model Code of Conduct for Corporate Political Spending. It sets parameters for companies about when, or whether, to spend politically; it gives them greater control over their spending; and it can serve as a kind of heat shield to protect them. The Code is the product of the Center for Political Accountability and The Wharton School's Zicklin Center for Governance and Business Ethics, with input from corporate governance experts, investors, directors and companies. It has the support of key figures in the business community, as demonstrated in a recent Fortune op-ed that I co-authored with the former vice president for North American Government Affairs at Dow Chemical.

The Center for Political Accountability is currently speaking with a growing number of companies about adopting the Model Code, and we invite any interested companies in the Crain's Cleveland Business readership area to contact us.

Bruce F. Freed

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