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Global Ethics & Integrity Benchmarks

2020

By Joan Elise Dubinsky and Alan Richter



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Global Ethics & Integrity Benchmarks

Our Commitment to Continuous Improvement. Your feedback, suggestions, and stories of how you are using Global Ethics & Integrity Benchmarks are welcome. Please send us your contact information if you wish to receive future versions of Global Ethics & Integrity Benchmarks.

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Joan Elise Dubinsky • rosentretergroup@yahoo.com
Alan Richter • +1-212-724-2833 • alanrichter@qedconsulting.com

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INTRODUCTION

Welcome to the Third Edition of Global Ethics & Integrity Benchmarks! Since 2009, we have offered these benchmarks for free to help organizations make a formal, practical and tangible commitment to ethics and integrity.

Global Ethics & Integrity Benchmarks (GEIB) is a tool for helping organizations assess and measure their progress in integrating ethics and integrity throughout their workplaces. It enables organizations, leaders, and their boards to identify specific actions to enhance performance. Although conditions and attitudes can vary, these benchmarks are global because of their worldwide applicability. Making these benchmarks global has certainly been a challenge. We believe they address the need for a universal systemic approach to workplace ethics and integrity.

Organizations around the world should operate in similar fashion when selecting ethical courses of action. Though governance, legal standards, and expectations for organizations may differ somewhat, the fundamentals of workplace ethics transcend national boundaries and legal systems.

Global values (e.g., truth, fairness, family, justice, freedom, and respect for life) are at the foundation of the Global Ethics & Integrity Benchmarks. Global values rooted in integrity can be found in all religions, texts on moral philosophy down through the ages, the United Nations Universal Declaration of Human Rights, and all rights-related conventions and principles. Though there is significant "play" in how global values can be defined and applied, what unites us as human beings is this ethical dimension. Different cultures, nations, and societies may differ about how to prioritize specific values. Nevertheless, all human societies accept that a set of global values exists and that these values tend to unite—rather than divide—us.

We have written Global Ethics & Integrity Benchmarks (GEIB) to apply to all types of organizations in all sectors. The benchmarks can be used by for-profit, not-for-profit, government and civil society organizations—wherever individuals care that their workplaces and community are known for a commitment to ethical action. The benchmarks will be most relevant to large and medium-sized organizations. However, small organizations can also benefit from working with this tool.

Since 2009 when we launched the first edition of the GEIB, we have observed that ethics and integrity expectations are rising around the world. Thousands of organizations around the world are using this tool, freely downloading the document from our website. Our ever-expanding Expert Panel (see pp 17) continues to provide up to the moment feedback on how GEIB applies to their organizations. In this third edition, we include a new benchmark on Interpersonal Misconduct, one of the most significant emerging ethical risks facing us today as diversity and inclusion have become critical to organizational success, as well as the growing global movement against harassment, sexual harassment and sexual assault.

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This model represents what is needed to build a house for ethics and integrity, in a systemic and sound manner. The four Foundation categories are essential to supporting the structure; the five Culture categories represent living in the "house"; and the six Risk categories provide protection from internal and external ethical risks.

In using GEIB as part of an organizational assessment, you can select from the categories offered – not all need apply, nor need they be weighted equally. Much will depend on the state of maturity and nature of your organization. For example, if you are just starting out with ethics and integrity, then we suggest you start with the Foundation categories.

These benchmarks reflect emerging standards and best practices. They will continue to change and evolve over time, responding to the changing environments in which we work. Context is critical in assessing the importance and relevance of these benchmarks. In one situation, you might not adopt a best practice while in another context it may be a critically desired factor. You will want to review these benchmarks, and evaluate the relevance and importance of each category to your own organization.

The levels. The best practices in each category are shown as 100%. For each category, the benchmarks are divided into five levels that indicate progress toward the best practices in that category – from 0% (where work has yet to begin) to 25% (where minimum compliance is the mindset) to 50% (where significant proactive work has begun to take hold) to 75% (where the work is ethically robust and progressive) and then on to global or world-class best practices at 100%. Reviewers may select benchmarks in more than one level in any category, but this is not a mathematical exercise. So, for example, if your organization's practices generally match the 50% level in a category, you can consider your organization to be at the 50% level of best practice in that category.

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Defining terms. We define ethics and integrity broadly. Ethics (right action) and integrity (personal character) refer to a commitment to virtuous thought and action in all aspects of how an organization is governed and run. We like to draw distinctions between legal compliance and ethics and integrity. Legal compliance describes the necessary and minimum conditions for following the law and avoiding punishment. Legal compliance focuses on what one has the right to do and by implication what one cannot do by law. By way of contrast, ethics and integrity describe the moral choices that individuals and organizations should make. In those parts of the globe where the rule of law is not fully respected, a focus on ethics and integrity is all the more imperative.

We believe that healthy, high-performing, and successful organizations must pay close attention to ethics and integrity, above and beyond legal compliance. Sovereign governments set legal standards. Legal standards and compliance expectations may be similar but are rarely identical across national borders. Organizational life today is global, as the flow of ideas, products, data, and services transcend the limits of political boundaries. As a result, ethics and integrity standards should flow through your organization and across your partners and suppliers without restriction.

By "global," we simply mean that these benchmarks are universally applicable, not specific to a country, culture, or industry. However, cultural, country, and industry considerations may impact which categories you prioritize. Over time, priorities may change.

Conceptual frameworks. There are competing frameworks for understanding and categorizing how global ethics and integrity work. Some of the prominent schools of thought include: 1) stakeholder prominence; 2) substantive and procedural due process; 3) corporate social responsibility and the purpose of the organization; 4) social contract theory; and 5) rights, duties and obligations of individuals and institutions. Our benchmarks include aspects of all of these sometimes competing frameworks.

Background on the source and development. We are indebted to the diversity field. Bench Marks for Diversity was first published by the Tennessee Valley Authority (TVA) in the early 1990s based on groundbreaking research. Julie O'Mara and Alan Richter then updated, reconfigured, and made the original research global to create the Global Diversity & Inclusion Benchmarks (2006, 2011, 2017). The idea behind the GEIB was to use the structure of the Global Diversity & Inclusion Benchmarks and apply it to Global Ethics & Integrity. This is now the third, updated version of the GEIB.

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The authors. Both of us reside in the United States and are aware of the cultural consequences of our location and background in compiling these global benchmarks. Alan grew up in South Africa, lived in the United Kingdom, and has been doing ethics and diversity consulting around the world for over 30 years. Joan grew up in the Midwest of the United States, has lived in several U.S. cities, has traveled and consulted in several countries, previously served as both the Chief Ethics Officer for the International Monetary Fund, and for the United Nations. She is one of the leading business ethics practitioners in the U.S. and among international organizations operating globally.

The panel of experts. To enhance and validate our global view, we have called on expert panelists (EP) who reside and/or work globally. We continue to expand the members of our EP. They are listed and acknowledged for their invaluable contributions on page 17.

We encourage you to incorporate an unwavering commitment to ethics and integrity into every aspect of organizational life. Ethical organizations recruit and retain ethical employees and partner with ethical suppliers, vendors, and other stakeholders. We believe that a fundamental commitment to ethics and integrity in organizational practices is key to making this a better world in which to live and work, one organization at a time.

If you have questions about the use of this tool, please contact us. We would be pleased to work with you in developing an appropriate approach for using this assessment tool.

Joan Elise Dubinsky
Kensington, Maryland

Alan Richter, Ph.D.
QED Consulting
New York, New York

February, 2020

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HOW TO USE THE GLOBAL ETHICS & INTEGRITY BENCHMARKS

Here are some ways to use these benchmarks:

- Create clear and aspirational organizational standards. Standards are helpful for employees, managers, executives, and board members because they help define excellence. Use the benchmarks to set standards for achieving ethics and integrity in your organization as part of your strategic planning process.
- Educate senior leaders and governance teams on expectations, goals, and structures for effective ethics and integrity programs within an organization.
- Engage employees and promote accountability for progress. Obtain buy-in from management and the board. Have groups discuss selected categories and try to reach consensus on the level at which their departments or organizations currently compare to the benchmarks. If no consensus can be reached, then discover what is the narrowest agreed-upon range. Over time, this iterative process can chronicle your organization's progress in the chosen categories. Report back to management and the board regularly.
- Evaluate organizational progress towards short-term and long-term program goals. Use your organization's benchmark scores to determine which of the categories are most important, and then set concrete goals as you work toward increasing the overall percentage/score.
- Engage in continuous improvement of your organization's ethics and integrity systems and processes. This set of global benchmarks is one tool—but not the only one of its kind—that can be used to conduct rigorous self-assessments resulting in measurable program improvement.
- Assess ethical risk. These benchmarks can help organizations identify, describe and assess a wide range of ethical and reputational risks.
- Inform internal audit's assurance arrangements and the effectiveness of the organization's control framework.

How NOT to Use These Benchmarks

These benchmarks have been created based on our experiences and the experiences of the expert panel. While we are confident that the benchmarks represent realistic and successful practices, they are not based on a systematic empirical study. Therefore, please use these benchmarks as guidelines, not as requirements. They should not be used to determine whether an organization has met specific legal standards set by any one national jurisdiction. Do not use them to make compensation decisions or judge the effectiveness of individuals who have organizational responsibility for implementing ethics and integrity programs. The benchmarks do not constitute legal advice, and are in no way a substitute for consultation with your organization's legal counsel. We are not legally responsible for any misuse of these benchmarks beyond their specific intended purposes.

Finally, these benchmarks do not provide organization-to-organization comparisons. This tool is not designed to create a sector scoreboard. It is solely designed for any organization to benchmark against global best practices and chart its own development over time. GEIB does not replace codes of conduct adopted by associations representing licensed professionals (e.g., doctors, lawyers, or accountants).

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CATEGORY DESCRIPTIONS

Foundation

1. **Vision, Purpose & Goals.** Covers the organization's overall approach to ethics and integrity, including how it formally articulates it's underlying commitment to ethical conduct, how these aspirations and expectations are embedded throughout the organization, and how they are reflected in the organization's purpose or reason for being. This category includes how an organization identifies and defines its core ethical values or principles.
2. **Leadership.** Covers the responsibilities of the organization's leadership in shaping, guiding, and supporting the organization's ethics and integrity initiatives. It examines how board members, leaders and managers show commitment, lead by example, and are held accountable for promoting ethics and integrity throughout the organization. This category includes an assessment of its "Tone from the Top".
3. **Ethics Resources.** Covers how the ethics function (standalone or integrated) is structured, staffed, and resourced, as well as its formal and informal reporting relationships. This category includes the qualifications, roles and responsibilities of those individuals who are assigned to implement the ethics and integrity function.
4. **Legal Compliance, Policies, & Rules.** Addresses how laws, policies, rules, and country or industry guidance create the legal system within which ethical behavior will flourish. It includes compliance with the legal framework, established by the multiple jurisdictions within which the organization operates. This category covers the systems and controls used to ensure that the organization, board and all employees are legally compliant.

Culture

5. **Organizational Culture.** Addresses how the organization promotes ethical conduct in the context of its mission, vision, purpose, structure, and strategy. This category explores the degree to which an organization focuses on shaping its organizational culture (both the written and unwritten rules, values and behaviors that dictate how work is performed and goals reached) and whether that culture actively promotes ethical conduct. This category addresses how culture promotes trust, respect and goodwill among all stakeholders.
6. **Rewards & Discipline.** Describes how the organization sets and enforces its standards for ethical conduct and behavior. This category addresses rewards and punishments, incentives that promote ethical behavior, and disciplinary action taken to deter or punish unethical conduct. This category includes how the organization promotes accountability through performance management, and whether ethical conduct is linked to compensation and/or other types of non-monetary benefits.
7. **Social Responsibility & Sustainability.** Describes the relationship between the foundational principles of the organization and service in the common good. This category covers the organization's efforts to establish links with, engages with, and invests in the communities and stakeholders with which it interacts. This category covers government relations, environmental stewardship, philanthropy, sustainability, human rights, social justice, and community impact.

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8. Ethics Communication. Describes how the ethics and integrity strategy is articulated and promoted, both internally and externally. This category covers how the organization presents itself, defines its stakeholders and how it crafts key messages for distinct audiences. This category considers both opportunities and ethical risks arising from the use of social networks and social media.
9. Ethics Training & Education. Explores ethics and integrity awareness, skill-building training, and the integration of such training into the overall development of employees. This category addresses the provision of ethics training throughout the life cycle of employees, and the degree to which these initiatives are integrated into other organization-wide training commitments.

Risk

10. Ethics Risk Assessment. Explores how the organization articulates and assesses ethical and reputational risk. This category describes how risk is defined, measured, and managed to ensure that the ethics and integrity strategy addresses those risks that are the most serious and most likely to occur.
11. Interpersonal Misconduct. Covers how the organization addresses harassment, sexual misconduct, discrimination, bullying, abuse of power, favoritism and nepotism, whether committed by board members, leaders, managers, employees, vendors, suppliers, or others with whom the organization has interactions.
12. Whistleblowing & Investigations. Explores how the organization encourages individuals to make reports about questionable conduct. This category describes the methods and protections offered to individuals who wish to make the organization aware of possible unethical behavior, misconduct, or illegal actions. This category covers how complaints are investigated while ensuring that the principles of fairness and due process are observed.
13. Conflicts of Interest. Covers the organization's ability to effectively manage personal and organizational conflicts of interest, including favoritism, nepotism, and self-dealing. This category considers the systems for recognizing, managing, and resolving personal conflicts of interest in the best interests ethically and in the interests of the organization.
14. Confidentiality & Transparency. Covers the organization's ability to effectively balance its duty to maintain an appropriate level of confidentiality and privacy with its obligation to promote transparency in its interactions with stakeholders.
15. Bribery & Corruption. Covers the organization's ability to effectively prevent, detect, and address fraud, waste, abuse of authority, bribery and corruption in all aspects of its operations. Bribery and corruption are defined as the offering, promising, giving, or receiving of any undue advantage, whether directly or indirectly, to or from a government official, a political candidate, party or party official, or any individual, including a person who directs or works for a private sector enterprise in any capacity.

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GUIDELINES FOR USE

Each category follows the same format. The benchmarks are grouped by levels. There are 5 levels of achievement, from 0% (inactive), 25% (reactive), 50% (proactive), 75% (progressive), to 100%. The 100% level indicates current global best practices for each ethics and integrity category as perceived by the authors and in concurrence with our expert panelists. Going beyond 100% would make your organization a pioneer and a model for the next update.

The 0% level typically identifies an organization that has not yet begun to focus on this specific ethics consideration. The 25% through 75% levels show progressively where an organization might be situated as it improves in that category, finally reaching the 100% or best-practice, level. The 100% level describes current best practices as of February 2020.

The benchmarks combine both processes and outcomes; however, the outcomes become more important at the higher level benchmarks. The positive outcomes are to be read cumulatively, so that 100% descriptions incorporate the positive outcomes of 25%, 50% and 75%. For example, if at 25% or 50% the benchmark says "some managers," assuming this is a positive outcome, then at 75% and 100% one can assume that "some managers" become "most (if not all) managers." The cumulative effect is strongest between 75% to 100%, but less so below the 50% range.

TERMINOLOGY

To clarify definitions and avoid repeating lengthy terminology, please note the following:

- We refer simply to "ethics," which in many places is shorthand for "global ethics and integrity."
- We use "chief ethics officer" to designate the most senior person responsible for leading ethics and compliance initiatives in an organization. This person has expertise in organizational ethics but may or may not be a full-time ethics professional. We want to distinguish the top executive or leader of the entire organization from the highest-ranking person in the organization with specific programmatic responsibility for ethics. The titles used for this role will vary around the globe.
- We use the term "leaders" to describe everyone in the organization who has responsibility for accomplishing some or all of the organization's ethics and integrity vision and goals. In some cases these leaders will be board members and senior executives. In other cases, "leaders" will include managers and supervisors and/or individual contributors.
- We use the term "code of conduct" and "code of ethics" interchangeably.

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1 : Vision, Purpose & Goals

Foundation

Covers the organization's overall approach to ethics and integrity, including how it formally articulates its underlying commitment to ethical conduct, how these aspirations and expectations are embedded throughout the organization, and how they are reflected in the organization's purpose or reason for being. This category includes how an organization identifies and defines its core ethical values or principles.

100%

- ☐ Ethical analysis and action are part of the fabric of the organization, tied to its vision, socially valuable purpose and mission.
- ☐ Ethics is seen as key to sustained progress and success.
- ☐ Employees consistently behave in a way that shows their commitment to achieving the organization's vision for ethical conduct.
- ☐ A diverse sampling of employees rate the workplace as just, tolerant, fair, and respectful of individuals and their communities.
- ☐ The organization is publicly acknowledged as a leader and strong promoter of ethics and integrity.
- ☐ The organization has effectively remediated past injustices in its organization's history.

75%

- ☐ The organization has articulated its "social contract" with each employee, specifying mutual and reciprocal rights, duties, and obligations.
- ☐ In a contest between upholding principles and seeking financial gain, leaders are clear that upholding ethical values comes before closing a deal, making a sale, or pursuing unbridled profitability or revenues.
- ☐ The organization's performance management system is based on the organization's core ethical values.
- ☐ Ethical action and ethical leadership are perceived as critical for the organization's continuing success.
- ☐ The organization has acknowledged its past inequities and unethical behavior.

50%

- ☐ Ethical conduct is seen as a requirement for organizational and individual performance.
- ☐ The organization has defined its core ethical values, and communicates about its vision and values on a regular basis.
- ☐ The organization and its leaders understand and reinforce the connection between ethical values, performance, organizational purpose, and success.
- ☐ The organization and its leaders recognize that legal conduct and ethical behavior are related but not necessarily identical.
- ☐ To raise employee sensitivity about ethical issues, the organization emphasizes ethical awareness and dialog.

25%

- ☐ "Ethics" is narrowly defined, referring primarily to legal compliance and/or the organization's formal internal rules structure.
- ☐ A legalistic code of conduct and/or compliance policy exists.
- ☐ There may be reference to ethics in the organization's values statement, but little is done practically to embed ethical action in the organization.

0%

- ☐ There is no explicit ethics and integrity vision, goals, policies, or program.
- ☐ Ethics and integrity are not seriously discussed in any business-related fashion.
- ☐ If mentioned, ethics and integrity are dismissed by leaders and managers as not relevant to the organization's vision, mission, reputation, profitability, or impact.

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2 : Leadership

Foundation

Covers the responsibilities of the organization's leadership in shaping, guiding, and supporting the organization's ethics and integrity initiatives. It examines how board members, leaders and managers show commitment, lead by example, and are held accountable for promoting ethics and integrity throughout the organization. This category includes an assessment of its "Tone from the Top".

100%

- ☐ Management and leadership rewards, including pay, bonuses, recognition and promotions, are tied to behavioral indicators measuring commitment to ethics and integrity.
- ☐ Leaders are fully accountable for supporting ethical conduct at both an individual and organizational level.
- ☐ Leaders are consistently seen as respected role models inside the organization and in the community at large.
- ☐ Leaders publicly support ethics and integrity initiatives, even when these initiatives are perceived as controversial.
- ☐ Leaders speak out against corporate and governmental wrongdoing, societal inequities and injustice, acknowledging that this may be controversial.

75%

- ☐ Managing ethically and inclusively are considered essential leadership competencies.
- ☐ Leaders and managers are humble, ethically aware, comfortable with the vocabulary of ethical analysis, and act consistently with the organization's values.
- ☐ Leaders are comfortable speaking about ethics and integrity.
- ☐ The board shares responsibility for integrating ethical conduct into the organization's culture, and includes ethics on its agendas.
- ☐ Ethical awareness, analysis, and action are routinely incorporated into selection, performance evaluation, and promotion decisions.
- ☐ When things don't go as well as predicted, leaders consistently take personal responsibility for adverse outcomes and acknowledge any harm done.

50%

- ☐ Leaders view promoting ethical conduct as part of their responsibilities and are held accountable for their own ethical behavior.
- ☐ Leaders hold managers and supervisors personally accountable for integrating ethical conduct into daily operations.
- ☐ Board members and leaders view ethics and integrity as a management level function, with direct impact on the organization's success.
- ☐ Leaders understand that there is a direct connection between "tone from the top" and whether their organization enjoys a positive reputation for ethics.
- ☐ The organization's leadership model incorporates personal ethical behavior as a key indicator of success.

25%

- ☐ Leaders view ethics and integrity as mainly a Human Resources or Legal function.
- ☐ Leaders need scripts to discuss ethics and integrity.
- ☐ Leaders are reluctant to adopt and promote ethical values, codes or credos.

0%

- ☐ Neither board members, leaders nor managers are involved or held accountable for their organization's reputation for ethics and integrity.
- ☐ Leaders assume that their private moral codes and beliefs are adequate in leading the organization.
- ☐ The organization does not consider ethical reputation or ethical conduct when selecting and appointing board members, leaders, managers, and key volunteers.

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3 : Ethics Resources

Foundation

Covers how the ethics function (standalone or integrated) is structured, staffed, and resourced, as well as its formal and informal reporting relationships. This category includes the qualifications, roles and responsibilities of those individuals who are assigned to implement the ethics and integrity function.

100%

- ☐ The ethics function has full operational independence.
- ☐ The chief ethics officer issues an Annual Report to all stakeholders concerning the maturity and efficacy of the organization's commitment to ethics and integrity.
- ☐ The chief ethics officer is a recognized and respected member of the senior management team.
- ☐ The chief ethics officer serves as an independent and confidential ethics advisor to board members.
- ☐ The chief ethics officer has a dual reporting relationship to executive management and the board.
- ☐ The chief ethics officer's remarks and reports are not subject to pre-clearance by management.

75%

- ☐ A senior executive is responsible for the daily operations of the ethics function.
- ☐ Sufficient financial and other tangible resources are allocated to the ethics function, as part of the organization's budget cycle.
- ☐ The structure, policies, practices, and systems that comprise the ethics function are described in an approved charter or framework statement.
- ☐ The chief ethics officer reports regularly to senior management and the board on activities, outputs, results and impact of the function.
- ☐ The ethics function publishes an Annual Report to all stakeholders concerning the maturity and efficacy of the organization's commitment to ethics and integrity.

50%

- ☐ There is a senior-level manager with adequate support responsible for organization-wide ethics and integrity activities.
- ☐ The senior-level ethics manager reports to the chief executive, or to another member of the executive management team.
- ☐ A designated budget has been allocated to cover implementation of the annual workplan for ethics and integrity.
- ☐ The ethics function is subject to regular independent oversight, either through existing oversight mechanisms such as internal audit, or through an external review mechanism.
- ☐ The ethics function reaches all organizational locations and units, regardless of geography.

25%

- ☐ Ethics functions are performed as additional, secondary duties by mid-level staff in Human Resources, Compliance or the Legal department.
- ☐ Organizational ethics is not recognized as a unique discipline requiring specialized skills, knowledge, or experience.
- ☐ Elements of an ethics and integrity program may exist in isolation, or in some scattered departments, but there is no integrated structure or design.

0%

- ☐ There is neither an organizational structure focused on ethics nor a designated individual responsible for ethics and integrity.

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4 : Legal Compliance, Policies & Rules — Foundation

Addresses how laws, policies, rules, and country or industry guidance create the legal system within which ethical behavior will flourish. It includes compliance with the legal framework, established by the multiple jurisdictions within which the organization operates. This category covers the systems and controls used to ensure that the organization, board and all employees are legally compliant.

100%

- ☐ Leaders uphold the code, policies and rules regularly referring to them in speeches and other communications, and use them in everyday decision-making.
- ☐ The board has adopted a code of ethics that guides governance officials' behavior.
- ☐ The code, policies and rules are seen as best practice documents in the organization's sector or industry.
- ☐ The organization assists its suppliers, vendors, industry partners and others in adopting ethical business practices.

75%

- ☐ The organization is knowledgeable and in compliance with the laws of all jurisdictions in which it operates and has a system for resolving conflicts of law.
- ☐ ___The code is an inclusive, evolving document, setting forth the mutual rights, duties, and obligations of both the organization and its employees.
- ☐ ___The code covers all members of the workforce, whether full or part time, occasional or regular, and those employed for fixed term or on open-ended contract.
- ☐ ___The organization has clearly articulated the ethical standards, principles and policies expected of everyone, including third parties (e.g., suppliers, vendors, consultants, agents, and contractual workers).
- ☐ ___The code, policies and rules are global in operation and address legal variations across countries and applicable international standards and conventions.
- ☐ ___The code provides concrete actionable guidance and examples of real situations and how to address them.

50%

- ☐ Policies and rules that describe what employees should or should not do on behalf of the organization are written in plain language, and are translated into all major languages spoken in the organization.
- ☐ Codes of ethics, policies and rules are available in written and electronic format, are freely available, and easily accessible by all internal and external stakeholders.
- ☐ Codes, policies and rules are updated regularly with revisions circulated upon adoption by the organization.
- ☐ The code is based on the organization's core ethical values and describes the type of business conduct expected of employees in all their interactions internally and externally.
- ☐ Functional leaders understand how the code, policies and laws apply specifically to their area of responsibility.

25%

- ☐ Legal requirements about ethics, integrity, and compliance are met.
- ☐ Leaders believe that ethics and obedience to law are identical and sufficient.
- ☐ The organization has adopted a code of conduct or code of ethics which provides basic guidance about legal compliance for employees and management.
- ☐ The operational policies and rules upon which the code of conduct is based are written by lawyers.
- ☐ The organization assumes that compliance with laws and regulations at its headquarters is an adequate standard.

0%

- ☐ No ethics, integrity, or compliance policies or rules have been adopted by the organization.
- ☐ No internal controls, monitoring or auditing processes exist to assess the organization's compliance with applicable laws.
- ☐ The organization does not have a clear understanding of the legal and ethical frameworks under which they are required to operate.

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5 : Organizational Culture

Culture

Addresses how the organization promotes ethical conduct in the context of its mission, vision, purpose, structure, and strategy. This category explores the degree to which an organization focuses on shaping its organizational culture (both the written and unwritten rules, values and behaviors that dictate how work is performed and goals reached) and whether that culture actively promotes ethical conduct. This category addresses how culture promotes trust, respect and goodwill among all stakeholders.

100%

- ☐ Employees are proud to work at the organization and would describe it as a great place to work, where ethics, integrity, inclusion, trust and fairness are highly valued.
- ☐ Employees can easily identify integrity role models in their current leadership ranks as well as in the organization's past leaders.
- ☐ The organization takes the long-term view, never sacrificing ethical principles for short-term financial gain.
- ☐ The organization describes its commitment to ethics and summarizes its accomplishments in this area in its annual report or through other publicly available communication channels.
- ☐ The organization values cultural diversity, but ethics and integrity are never compromised in the name of cultural relativity.
- ☐ Leaders are strongly committed to continuously improve their organization's culture.

75%

- ☐ The organization promotes its commitment to ethics and integrity, and is willing to share both successes and failures with internal and external audiences.
- ☐ There are recognized positive ethical role models among the leaders of the organization.
- ☐ Employees generally feel good about the organization as well as its commitment to social responsibility and can identify specific examples of positive ethical conduct.
- ☐ Employees feel safe speaking up (e.g., asking for help or "blowing the whistle") if they encounter possible wrongdoing in the organization.
- ☐ Employees believe that the organization will respond promptly and appropriately to concerns or complaints that are raised.
- ☐ Employees do not experience pressure to ignore rules, policies, applicable laws or regulations in order to get their work accomplished.
- ☐ Recruitment, promotion, performance management, and grievance systems are fair and consistent.

50%

- ☐ The organization has broadly committed itself to ethics and integrity, even if there are some shortcomings.
- ☐ The culture of the organization is regarded as open to discussion, dissent, and differing opinions.
- ☐ The organization's culture is described in terms of its values, mission, and ethical commitments to stakeholders.
- ☐ The organization routinely assesses its culture through surveys.

25%

- ☐ The culture is shaped by minimal regard for rules or laws.
- ☐ Employees perceive a significant gap between the organization's ethical communications and its actions.
- ☐ Employees rarely speak out to challenge hierarchical authority or to question a superior's decisions or directions.
- ☐ Employees do not believe that they can speak out about wrongdoing without experiencing some type of workplace retribution.

0%

- ☐ The prevailing attitude about the organization is that it lacks a culture of trust and integrity.
- ☐ Organizational practice or national culture is used to justify any behavior.
- ☐ Employees are fearful of speaking up about observed misconduct and believe that making reports of wrongdoing will be futile.

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6 : Rewards & Discipline

Culture

Describes how the organization sets and enforces its standards for ethical conduct and behavior. This category addresses rewards and punishments, incentives that promote ethical behavior, and disciplinary action taken to deter or punish unethical conduct. This category includes how the organization promotes accountability through performance management, and whether ethical conduct is linked to compensation and/or other types of non-monetary benefits.

100%

- ☐ Employees see the organization as fair in its internal administration of justice (e.g., grievance procedures and dispute resolution systems).
- ☐ The organization's policies and guidelines for rewards and discipline are regarded as best practice in its industry.
- ☐ Leaders understand what motivates employees to act ethically or to act unethically and apply the training and tools necessary to motivate and reinforce ethical behavior.
- ☐ Compensation and incentive programs are routinely analyzed to avoid unintentional unethical consequences.

75%

- ☐ The organization recognizes and rewards ethical behavior and enforces appropriate discipline when necessary.
- ☐ Leaders are experienced in taking disciplinary measures when necessary, and are swift to recognize and reward good conduct.
- ☐ The recruitment and performance management systems incorporate the organization's values and ethical principles.
- ☐ The organization does not shy away from taking disciplinary action against high-performing, senior leaders who have acted unethically.
- ☐ The organization is transparent in publishing or discussing examples of disciplinary action taken, after removing identifying details.
- ☐ Ethical conduct is seen as one of the critical elements for promotion and advancement at all levels.

50%

- ☐ The organization has explicit policies for breaches of ethics, integrity, and compliance.
- ☐ The organization has adopted formal procedures that provide subjects of complaints with notice and an opportunity to be heard.
- ☐ The organization usually imposes disciplinary measures when misconduct is substantiated, based on the results of a formal investigative mechanism.
- ☐ Prior to taking disciplinary action, leaders consult with Human Resources, Legal or Ethics & Compliance to ensure consistent and fair application of policies.

25%

- ☐ The consequences of unethical behavior are addressed only if they adversely impact business results.
- ☐ Lower-ranking employees believe that the organization grants impunity to higher-ranking individuals.
- ☐ Leaders may tell others to "do the right thing" but this is regarded as less important than achieving results.

0%

- ☐ There is no policy addressing ethical breaches or lapses in integrity.
- ☐ There is no explicit system to either recognize ethical action or take disciplinary action for unethical behavior.
- ☐ Promotion and compensation systems, including bonuses and rewards, are linked only to results, and not how those results are achieved.

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7: Social Responsibility & Sustainability

Culture

Describes the relationship between the foundational principles of the organization and service in the common good. This category covers the organization's efforts to establish links with, engages with, and invests in the communities and stakeholders with which it interacts. This category covers government relations, environmental stewardship, philanthropy, sustainability, human rights, social justice, and community impact.

100%

- ☐ The organization provides financial resources as well as employee time and labor in a variety of community projects.
- ☐ The organization supports the United Nations' Sustainable Development Goals (SDGs) and mainstreams social responsibility into everyday practice.
- ☐ Facilities are selected, where possible, to serve and promote sustainable economic growth of the whole community, with particular attention paid to areas that have been historically underserved.
- ☐ The organization is generous in supporting and assisting other organizations in their ethics and integrity initiatives.
- ☐ The organization vigorously supports human rights, development, and environmental sustainability in all its actions.
- ☐ The organization and its leaders have addressed and effectively remediated any past human rights and environmental violations in which their organization has been complicit.

75%

- ☐ The organization thinks systemically, analyzing its social responsibility, investment and philanthropic policies in order to align initiatives.
- ☐ Employees are actively encouraged to raise and address human rights issues that they encounter in their regular work.
- ☐ The organization's involvement in the community and environment reflects a long-range commitment to diversity and inclusion.
- ☐ The organization sponsors scholarship and internship programs that positively impact communities where it has operations.
- ☐ The organization sponsors and engages with community, academic, and business events that promote ethical conduct.
- ☐ The organizations' compensation and benefit programs are designed to elevate the lives of its employees and the communities in which they live.

50%

- ☐ The organization makes charitable contributions and uses these to demonstrate its civic-mindedness.
- ☐ The organization addresses social and environmental issues related to its mission and publicizes its social responsibility policy.
- ☐ The organization supports the personal contribution by its employees of their personal time, energy, and ideas to social and environmental concerns.
- ☐ The organization has some sustainability strategies, tied to diversity, inclusion and integrity.
- ☐ The organization examines how to integrate responsibility for future generations and preservation of the natural environment into its overall business plan.

25%

- ☐ Motivated by public relations, marketing, tax reduction, or other perceived benefits, the organization involves itself in mainstream social causes, government-related projects, the community, or the environment.
- ☐ The organization believes that the personal philanthropic efforts of its senior leaders satisfy any wider obligation to engage on social or environmental concerns.

0%

- ☐ There is little to no involvement, engagement, or support for the external communities with which the organization is associated.
- ☐ The organization does not view social responsibility and sustainability as integral to its success.
- ☐ The organization simply responds to government inquiries or requests for information on social or environmental concerns, through formal (typically legal) channels.

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8 : Ethics Communication

Culture

Describes how the ethics and integrity strategy is articulated and promoted, both internally and externally. This category covers how the organization presents itself, defines its stakeholders and how it crafts key messages for distinct audiences. This category considers both opportunities and ethical risks arising from the use of social networks and social media.

100%

- ☐ Leaders are candid in their internal and external discussions about ethics and engage in conversations that explore ethical dilemmas they have faced.
- ☐ Leaders are circumspect in how they use mass media and social media communications tools.
- ☐ Leaders speak publicly about how ethical values inform their positions on social and public policy, such as environmental sustainability, wage inequality, decent work, or any aspect of human rights.
- ☐ The organization carefully navigates the boundary between privacy protection and its commitment to transparency.

75%

- ☐ The organization directly connects ethical awareness and conduct with its reputation and educates everyone about the importance of communicating transparently and honestly about ethical behavior.
- ☐ An accessible, interactive ethics website provides links to ethics, integrity and compliance materials for employees as well as for external stakeholders.
- ☐ The organization's external website includes information about its ethics vision, goals, policies, programs, and results.
- ☐ The organization publishes independent annual reports about its ethics function, and social responsibility and sustainability, focusing on its goals, activities, and results, and distributes this report widely to internal and external stakeholders.

50%

- ☐ The organization sponsors regular and diverse channels for employees to discuss ethics issues and to provide input to the organization.
- ☐ Examples of best ethical practices are identified and shared through a variety of communications media, such as websites, social media, podcasts, e-mails, and blogs.
- ☐ The organization's dedicated communication functions – community affairs, internal communications, public relations, and marketing – are supportive of ethics initiatives.
- ☐ Employees receive guidance on using social media. They are directed to maintain a clear distinction between their personal on-line presence and their organizational role.

25%

- ☐ If leaders talk about ethics they do so informally or on an ad hoc basis.
- ☐ Employees occasionally receive reminders about ethics-related policies and legal compliance requirements.
- ☐ Employees use the organization's social media without the benefit of guidance and may indiscriminately use these media to promote personal or political agendas (images and text) contrary to the organization's ethical values.
- ☐ Website information (or print literature) is available about ethics and integrity.

0%

- ☐ There are no formal communications or discussions about ethics and integrity.
- ☐ Leaders openly express disbelief that ethical considerations matter to the success of the organization.

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9: Ethics Training & Education

Culture

Explores ethics and integrity awareness, skill-building training, and the integration of such training into the overall development of employees. This category addresses the provision of ethics training throughout the life cycle of employees, and the degree to which these initiatives are integrated into other organization-wide training commitments.

100%

- ☐ The organization provides state-of-the-art ethics training to all board members, executives, managers, supervisors and employees, and establishes a minimum number of ethics training hours annually for each category of learner.
- ☐ Ethics education concentrates on enhancing ethical awareness, decision-making, leadership, courageous action, and personal accountability.
- ☐ The ethics training curriculum is predicated on an educational needs assessment that takes into consideration the organization's profile on risk, accountability, legal liability, and reputation.
- ☐ Ethics training is formally evaluated for effectiveness and regularly reviewed and updated.
- ☐ The organization works with others in its industry, communities, and/or academia to sponsor research into ethics training effectiveness and evaluation methodologies.

75%

- ☐ The organization has adopted an ethics education strategy that includes the Board, leaders, the entire workforce, and key third parties.
- ☐ Ethics education uses challenging and realistic situations that prepare individuals to recognize, appreciate, and resolve ethical dilemmas that they will encounter in everyday business.
- ☐ Ethics is included in other development programs, such as leadership, management and supervisory training, as well as for specialized functions such as procurement, risk management, security, and audit.
- ☐ Instructor guides or tool kits are provided to supervisors and managers with the expectation that they conduct ethics/values discussions as part of team meetings.
- ☐ Ethics professionals help design, develop, deliver, and reinforce ethics education.
- ☐ Managers are expected to help deliver ethics and compliance education and serve as champions for ethical development.
- ☐ Ethics training is offered through a variety of media and learning technologies, matching the subject matter and learning outcomes with the optimal instructional methodologies.

50%

- ☐ Ethics training is offered as a stand-alone course rather than integrated within the overall training and development curriculum.
- ☐ Ethics training is offered to newly hired employees and to those who are promoted.
- ☐ The organization uses an ethical decision-making methodology, tied to its core ethical values, that provides tools to help employees resolve ethical dilemmas.
- ☐ The organization incorporates social science findings on barriers to ethical action into its ethics education curriculum.
- ☐ The organization carefully matches available learning technologies with learning objectives and desired outcomes.

25%

- ☐ Training programs on ethics are brief (whether face-to-face or online) and focus on informing employees about policies and meeting legal requirements.
- ☐ Training programs on ethics reflect the legal and regulatory environment of the country where headquarters is located.
- ☐ Persons designing and delivering training do not have specific expertise in ethics.
- ☐ The success of ethics education is measured by the number of employees who have passed an end-of-program quiz or attendance/head count.

0%

- ☐ No ethics or compliance education or training is provided to employees.
- ☐ Standard training programs (e.g., new employee induction, supervisory training, management development, and leadership) are silent about the organization's core ethical values.

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10 : Ethics Risk Assessment

Risk

Explores how the organization articulates and assesses ethical and reputational risk. This category describes how risk is defined, measured, and managed to ensure that the ethics and integrity strategy addresses those risks that are the most serious and most likely to occur.

100%

- ☐ The organization routinely benchmarks its ethics and reputational risk assessment methodology and results with peer organizations.
- ☐ The organization promotes learning from mistakes and risks as a pathway for improvement, rather than as a vehicle to take punitive action.
- ☐ Leaders take personal ownership for identifying, reducing, mitigating, and resolving ethical and reputational risks.
- ☐ The organization uses its ethics risk assessment to predict and plan for emerging ethical risks.
- ☐ The organization routinely engages independent, external experts to validate its risk assessment, mitigation and internal control efforts.

75%

- ☐ Findings and recommendations from surveys and risk assessments are used to strengthen the organization's commitment to ethics and integrity.
- ☐ The organization is adept at analyzing ethical risk data from multiple sources and across organizational boundaries to enhance internal controls and oversight.
- ☐ Senior leaders take ownership of each major category of risk and assume personal responsibility for risk mitigation plans.
- ☐ The assessment considers the likelihood, seriousness, and potential impact of each ethical risk, in all relevant jurisdictions.
- ☐ Particular attention is paid to risks from supply chain and third-parties, revenue streams, implementing partnerships, joint ventures, sustainability and public-private sector engagement.
- ☐ The organization uses its ethics risk assessment to inform its ethics education, outreach, communications, policy and advisory services.
- ☐ The organization's internal controls system includes appropriate measures and risk management procedures designed to mitigate key ethics risks, and these controls are periodically evaluated for effectiveness.
- ☐ Internal audit assesses the key risks to a healthy organizational culture and routinely provides assurance to leaders on the effectiveness and impact of ethics and integrity processes and controls.

50%

- ☐ The organization considers risk assessment as a tool to ensure that its ethics strategy focuses upon the most likely to occur, and the most serious, ethical risks.
- ☐ The organization uses both qualitative and quantitative methods to seek data from a broad group of stakeholders, in order to fully assess ethical risks.
- ☐ Sufficient resources are allocated to conduct a reliable risk assessment.
- ☐ The ethics assessment incorporates risks from interpersonal misconduct, conflicts of interest, labor disputes, data breaches, privacy and confidentiality losses, corruption, accountability failures, acquisitions and mismanagement.
- ☐ Ethics risk assessment is included in a comprehensive risk management system relevant to the organization's sector or industry.

25%

- ☐ Ethics and integrity risks are viewed as having minor or modest impact on the organization's ability to achieve results.
- ☐ The organization's enterprise risk management system focuses narrowly on risks arising from legal and regulatory non-compliance.
- ☐ Risk management is seen as a necessary condition to enter certain markets or to conduct operations in specific parts of the globe.
- ☐ The organization primarily limits the scope of formal risk assessment and mitigation to financial practices.

0%

- ☐ The organization makes no effort to consider how ethical and reputational risks as relevant to its long-term sustainability.
- ☐ The organization considers addressing ethical risks as an invitation to adverse litigation.

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11: Interpersonal Misconduct

Risk

Covers harassment, sexual misconduct, discrimination, bullying, abuse of power, favoritism and nepotism, whether committed by board members, leaders, managers, employees, vendors, suppliers, or others with whom the organization has interactions.

100%

- ☐ The organization is recognized for its commitment and effective methods that eliminate all forms of harassment, discrimination, or abuse.
- ☐ The organization publicly reports on interpersonal misconduct risks and how these risks are addressed, even if this may cause public embarrassment.
- ☐ The organization works actively with its stakeholders to promote initiatives, both nationally and internationally, that enhance civility, respect, equity, and safety.
- ☐ The organization has adopted effective policies and practices to safeguard children and vulnerable adults with whom it interacts.
- ☐ Any prior incidents of harassment or bullying are seen by employees as a thing of the past and highly unlikely to return, given the positive transformation of the culture.
- ☐ The organization actively adopts standards for its ethical use and reliance upon artificial intelligence or other types of "big data" to eliminate unconscious bias.
- ☐ The Board regularly evaluates the effectiveness of the organization's systems and programs to counteract interpersonal misconduct and promote civility and workplace respect.

75%

- ☐ The organization and its leaders are well respected for promoting a culture of civility, humility, trust, and sensitivity.
- ☐ The organization clearly communicates its expectations for respect and civility to its third parties, including agents, consultants, contractors, vendors, suppliers, partners, and joint venture parties.
- ☐ The organization provides effective protection from retaliation for the reporting of suspected interpersonal misconduct.
- ☐ Sexual orientation and gender identity (LGBTQI) rights are protected and supported.
- ☐ The organization regularly assesses the levels of psychological safety, engagement, and inclusion among employees to strengthen trust, communication, and collaboration.
- ☐ The organization has established processes and adequate resources to provide necessary support and comfort to victims, irrespective of whether the allegations have yet been validated or not.
- ☐ The organization pre-screens leaders for possible prior interpersonal integrity concerns before offering employment or promotion.

50%

- ☐ The organization has adopted a zero tolerance standard for harassment and abuse.
- ☐ Workplace civility, individual respect and intercultural sensitivity are promoted as positive elements of the organization's culture.
- ☐ The organization makes an effort through communication, training and performance management, to promote a civil and harmonious work environment.
- ☐ The organization discourages romance where hierarchy is concerned, to avoid the potential for conflicts of interest, harassment, exploitation or discrimination.

25%

- ☐ The organization has adopted generic human resources policies that address employment discrimination and harassment.
- ☐ The organization's rules on interpersonal conduct simply comply with the basic laws of the entity's country, province, or state of incorporation.
- ☐ The organization has no independent means to investigate interpersonal misconduct issues.

0%

- ☐ The organization has not implemented any rules, policies or systems to address interpersonal misconduct.
- ☐ There is poor oversight on how employees behave with each other, customers, vendors, consultants, or other stakeholders.

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12 : Whistleblowing & Investigations

Risk

Explores how the organization encourages individuals to make reports about questionable conduct. This category describes the methods and protections offered to individuals who wish to make the organization aware of possible unethical behavior, misconduct, or illegal actions. This category covers how complaints are investigated while ensuring that the principles of fairness and due process are observed

100%

- ☐ Reporters and subjects of reports receive both procedural and substantive due process protections.
- ☐ There are no adverse consequences for good faith reporting of misconduct or seeking advice.
- ☐ Disciplinary action is imposed without regard to rank, status, hierarchy, or position.
- ☐ The organization provides interim protection for reporters of observed misconduct as a means to prevent future harm and reduce the likelihood of retaliation.
- ☐ The organization implements remedies for any damage caused by retaliation.
- ☐ The organization has adopted independent and neutral channels for reporting and investigating allegations against its executive head.

75%

- ☐ The organization is proactive in preventing and reducing the risks of retaliation.
- ☐ Employees receive clear instructions on how, when, and why to call the hotline or helpline.
- ☐ Hotline/helpline usage rates and outcomes are used to identify emerging ethics and reputational risks.
- ☐ There is a single set of guidelines that controls how internal investigations are conducted throughout the organization.
- ☐ Supervisors and managers receive training on how to recognize and prevent retaliation.
- ☐ Investigations are objective, independent, effective, thorough, prompt, and fair.
- ☐ Investigators do not make or participate in decisions concerning disciplinary action to be taken by management.
- ☐ Investigators recuse themselves from an investigation should there be any potential conflict of interest that could jeopardize the validity of the investigation.

50%

- ☐ The organization offers independent and confidential channels (usually referred to as a hotline or helpline) where employees, as well as other third parties, can make reports or complaints about unethical behavior or misconduct.
- ☐ Retaliation and retribution against those who speak up, or ask for advice, is not tolerated.
- ☐ Concerns reported to the helpline are summarized and transmitted to a confidential point of contact who determines whether each reported matter requires follow-up, referral, investigation, or resolution.
- ☐ Reporters of workplace concerns may choose to remain anonymous.
- ☐ Due regard to the privacy of the reporter and witnesses is provided.
- ☐ Summary data are reported at least annually to management and the Board describing the kinds of matters that have been reported to the helpline and their outcome/disposition.
- ☐ The organization supports independent investigations into reports of wrongdoing.
- ☐ Investigators receive regular training on how to conduct fair, objective, independent, and confidential fact finding, to ensure that their conclusions are based on credible evidence.

25%

- ☐ Employees are expected to speak to their direct supervisors about unethical behavior or misconduct regardless of whether these individuals are implicated in the reported matter.
- ☐ The organization has a policy that requires employees to follow and exhaust their chain of command when seeking resolution of any workplace issue.
- ☐ The organization actively discourages the bringing forward of anonymous complaints about unethical behavior or misconduct.

0%

- ☐ There are no channels for individuals to report observed misconduct.
- ☐ Employees are fearful of speaking up or challenging how decisions are made, and believe that to do so would subject them to workplace harm.
- ☐ Employees believe that the act of reporting is futile, and that if they did so, the organization would offer immunity to highly valued individuals.

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13: Conflicts of Interest

Risk

Covers the organization's ability to effectively manage personal conflicts of interest, eliminate favoritism, and eradicate self-dealing. This category considers the systems for recognizing, appreciating, and resolving personal conflicts of interest in the best interests of the organization.

100%

- ☐ Through regular organization-wide surveys, employees report that they believe that promotions are based on performance rather than favoritism.
- ☐ Corporate and individual charitable and political contributions made by leaders and their close family members are disclosed and reviewed for actual or potential conflicts of interest.
- ☐ The organization has an effective gifts registry program to track, analyze and address gifts received by both individuals and the organization.
- ☐ The Board receives and evaluates the effectiveness of the organization's programs to recognize, control, and remedy conflicts of interest.
- ☐ The organization continuously and closely monitors the risk of conflicts of interest (personal, organizational, financial and familial) as part of its strategy to prevent and address corruption.

75%

- ☐ Responsibility for the organization's efforts to prevent and mitigate conflicts of interest is assigned to a senior ethics official.
- ☐ The organization sensitizes employees at all levels to avoid even the appearance of a conflict of interest.
- ☐ Senior leaders make it clear that they will not tolerate any behavior that creates conflicts of interest.
- ☐ Written advice on conflicts of interest is provided with the reassurance that the advice, if followed, provides the individual with a "safe harbor" from subsequent disciplinary action.
- ☐ Integrity due diligence systems are used to pre-screen Board members, executives and designated managers for possible conflicts of interest before an offer of employment or promotion is made.
- ☐ Annually, the Board, executives, and key staff, confidentially disclose their personal assets, liabilities, and outside activities to detect and remedy real or potential conflicts of interest.

50%

- ☐ The organization encourages employees at all levels to obtain confidential ethics advice about actual or possible conflicts of interest from a designated ethics and compliance professional.
- ☐ Confidential advice on conflicts of interest is delivered in writing, outlining facts, issues, consequences, and recommended actions.
- ☐ Conflicts of interest are clearly defined and employees are trained in how to manage them, particularly through awareness, disclosure, caveats, and recusal.
- ☐ The organization has adopted policies that limit the offering, soliciting, or accepting of gifts and hospitality, entertainment, and travel subsidies.
- ☐ The organization has policies on outside employment, external activities, political engagement, loans to executives and key managers, and the employment of relatives or other close friends of staff.
- ☐ The organization works to reduce bias and favoritism in its decisions about recruitment, selection, promotion, benefits, compensation, and performance management.
- ☐ Procurement, supply chain, government relations/lobbying, finance staff, attorneys, and others who are likely to encounter conflicts of interest receive support to prevent and remedy conflicts of interest.

25%

- ☐ Dealing with conflicts of interest is seen as procedural in nature and undertaken primarily for cosmetic purposes.
- ☐ Conflicts of interest may be identified and resolved, but policies fail to specify the types of situations where conflicts of interest are likely to occur.
- ☐ Conflicts of interest are examined as compliance exercises, rather than as opportunities to enhance ethical awareness.
- ☐ Employees are encouraged to discuss possible or actual conflicts of interest with either Human Resources or their direct supervisor.

0%

- ☐ Organizational leaders fail to acknowledge that self-interest, favoritism or self-dealing could influence their decision-making.
- ☐ Leaders and managers assume that conflicts of interest cannot occur within their own organization because they believe themselves to be ethical individuals.
- ☐ There are no identified organizational resources where employees can turn for confidential advice about possible or actual conflicts of interest.

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14 : Confidentiality & Transparency

Risk

Covers the organization's ability to effectively balance its duty to maintain an appropriate level of confidentiality and privacy with its obligation to promote transparency in its interactions with stakeholders.

100%

- ☐ The organization is recognized as an outstanding leader at safeguarding the integrity of information, balanced by a climate of transparency and trust.
- ☐ The Board regularly evaluates how well the organization both maintains and promotes transparency.
- ☐ Through regular organization-wide surveys, employees report that they have full access to the information that they need and confidentiality is respected in word and deed.
- ☐ The organization has adopted clear standards for the ethical use and reliance upon artificial intelligence or other types of "big data".

75%

- ☐ The organizational culture promotes asking questions about who needs to have access to designated information and how private information should best be protected.
- ☐ Documents are clearly labeled so there is no ambiguity about what constitutes confidential data.
- ☐ All staff act with care in handling confidential information.
- ☐ Stakeholders feel comfortable that their private and confidential information will be protected from inadvertent disclosure.
- ☐ Should a data breach negatively impact stakeholders' personal and private data held by the organization, leaders respond promptly and fully to mitigate the loss of private data.
- ☐ The organization publishes complete lists of their subsidiaries, affiliates, joint ventures, and other related entities, explaining ownership and investment structures.

50%

- ☐ There is widespread recognition of the importance of keeping confidential records, and respecting stakeholder privacy.
- ☐ Strict confidentiality is maintained throughout the internal investigations process.
- ☐ The organization has adopted policies that encourage transparency in communications with key stakeholders, while preserving confidentiality where appropriate.
- ☐ The organization has enacted thoughtful protections of personal data that are consistent with emerging global privacy standards.
- ☐ Leaders are trained to become effective communicators, thereby providing information to stakeholders in a timely and strategic manner.
- ☐ All staff are regularly trained and updated on how to protect confidential information.
- ☐ Financial and operational controls consistently protect confidential information.
- ☐ The organization is actively considering how to adopt and provide standards for the ethical use and reliance upon artificial intelligence or other types of "big data".

25%

- ☐ Even when materials are labeled "Confidential", there is low confidence that information will in fact be protected.
- ☐ Leaders say they value and support transparency in the workplace, but key information is often withheld from stakeholders.
- ☐ The organization is not ready to address the ethical implications of "big data", artificial intelligence, and the mining of personal employee, stakeholder, or customer data.

0%

- ☐ There is widespread perception that promises of confidentiality are not kept.
- ☐ There is no transparency in communications from the top.
- ☐ Employees, regulators and other stakeholders are not kept current on information that is important to their functions.
- ☐ There are no controls to prevent breaches of confidentiality or invasions of privacy.

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15: Bribery & Corruption

Risk

Covers the organization's ability to effectively prevent, detect, and address fraud, waste, abuse of authority, bribery and corruption in all aspects of its operations. Bribery and corruption are defined as the offering, promising, giving, or receiving of any undue advantage, whether directly or indirectly, to or from a government official, a political candidate, party or party official, or any individual, including a person who directs or works for a private sector enterprise in any capacity.

100%

- ☐ The organization publicly reports on corruption and bribery risks and how these risks are addressed.
- ☐ The organization works actively within its stakeholder communities to promote community and societal initiatives, both nationally and internationally, designed to eliminate corruption and bribery.
- ☐ The organization provides effective protection from retaliation for the reporting of suspected misconduct, including but not limited to conflicts of interest, bribery, and corruption.
- ☐ The Board regularly evaluates the effectiveness of the organization's programs to adhere to the letter and spirit of laws to eliminate fraud, waste, abuse of authority, bribery and corruption.

75%

- ☐ The organization has implemented a comprehensive anti-corruption program, including prevention, outreach, education, and on-going risk assessment.
- ☐ The organization has identified the specific types of business interactions that can pose a significant risk in the exchange of corrupt payments.
- ☐ The organization extends its anti-corruption program to all of its third parties and its supply chain. Failure to comply with the organization's requirements may lead to termination of these relationships.
- ☐ The organization has adopted policies that ensure that charitable contributions and sponsorships are not used as a subterfuge for bribery.
- ☐ The organization has a zero-tolerance policy for facilitation payments of any kind and requires prompt disclosure of all attempts to offer or accept bribes or corrupt payments.
- ☐ Senior leaders recognize that their organization's social responsibility and sustainability initiatives are at risk if they are seen as tolerating corruption at any level.

50%

- ☐ The organization's commitment to zero tolerance of bribery and corruption is formalized in governance level policies which are widely disseminated and implemented.
- ☐ The organization has financial and accounting procedures that address the risk that books and accounts can be manipulated to hide bribery or corruption.
- ☐ The organization places a premium on the integrity of its financial and accounting records and financial reporting.
- ☐ The organization has implemented a structured financial disclosure program to detect and prevent bribery and corruption.

25%

- ☐ Bribery and corruption are narrowly defined, as the offering, promising, or giving of any undue advantage to or from a government official.
- ☐ The organization has adopted a stand-alone anti-corruption policy.
- ☐ There is poor oversight on expenses or reimbursements for employees and third parties.

0%

- ☐ The organization has not implemented an integrated system of effective internal controls, audit, or independent oversight to prevent bribery and corruption.
- ☐ The organization does not maintain accurate books and records and may use off-the-books accounting.

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THE AUTHORS

Joan Dubinsky, Esquire

Joan Dubinsky is an internationally recognized expert in business ethics and corporate compliance. Beginning in 1985, she helped create the field of business ethics, gaining recognition for the role of ethics in the conduct of business and organizational life. She has served as the chief ethics or compliance officer at several internationally recognized organizations including the United Nations, the International Monetary Fund, the American Red Cross, and BAE Systems, Inc. In addition, she is the president of the Rosentreter Group, providing consultation in ethics, compliance, and organizational development. Joan is a Lecturer at the School of Public Policy, University of Maryland and at the Heller School of Social Policy and Management at Brandeis University. She is a Fellow with the Center for Professional Responsibility in Business and Society, at the Gies School of Business, University of Illinois, and a Fellow with the Rutland Center for Ethics, Clemson University. She serves as the Independent Ethics Advisor to the Board of Directors of the Global Fund to Fight HIV, Tuberculosis and Malaria. She received her B.A. in Religious Philosophy from the University of Michigan and her Juris Doctorate from the University of Texas. Contact email: rosentretergroup@yahoo.com

Alan Richter, Ph.D.

Alan Richter, the founder and president of QED Consulting, has consulted to organizations for many years in multiple capacities, and specializes in the areas of leadership, values, culture, and change. He has provided strategic consulting and assessments and has designed and developed innovative curricula for ethics, global diversity and intercultural effectiveness, using innovative case studies, simulations and games, videos, and interactive exercises. He is the co-author of the Global Diversity & Inclusion Benchmarks and the Global Diversity Survey and the co-editor of An Inquiry into the Existence of Global Values (Hart, 2015). He has been a presenter at many conferences around the world and has worked in over 60 countries. He has an M.A. and a B.A.B.Sc. from the University of Cape Town, and a Ph.D. in Philosophy from Birkbeck College, London University. Contact email: alanrichter@qedconsulting.com telephone: +1-212-724-2833.

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THE EXPERT PANEL

Jean Abboud
Sherian Abramaitys-Yi
Osvaldo R. Agatiello
Penny Andrews
John Barkat
Larry Barnett
Joyce Brauer-Weston
Helmut Buss
Martina Coxova
Keith Darcy
Dennis Davis
Diagne Mouhamadou
Dawn-Marie Driscoll
George Enderle
Anne Harris
Nick Jackson
Christopher W. Jones
J. Graham Joscelyne
Jessica McManus
Christopher Michaelson
Nazeema Mohamed
Gwen Murphy
William A. Nelson
Jeff Oak
Matthew Pachman
Katrina Pugh
Suomi Sakai
Arnold Smit
Robert J. Smith
Christoph Stueckelberger
Ruth Szabo
Lex Takkenberg
Gillian Triggs
Greg Triguba
Pulina Whitaker

Past Expert Panelists

Elia Armstrong
Gerard Biraud
Maria Borrero
Eudes Brophy
Carlos Desmet
Philippa Foster-Back
Paolo Giusta
W. Michael Hoffman
Timothy Holmes
Mohammad Kisubi
Len Konar
Ann E. Lewis
Amalia LoFaso
Joseph E. Murphy
John O'Byrne
Nikos Passos
Paula F. Saddler
Tore Skatun
Jonathan Sprole
Simon Webley
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Global Ethics &
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