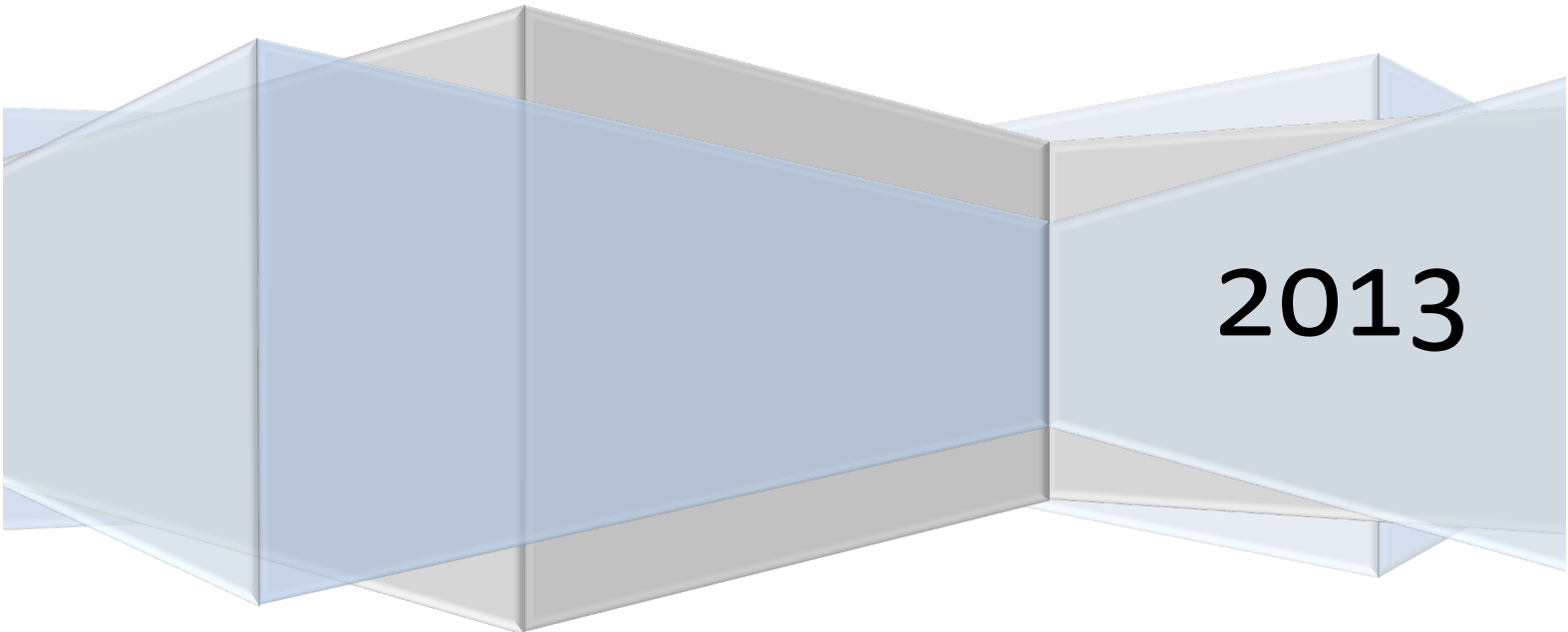




Central European University

Global Integrity Survey Report



2013

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Introduction

Regardless of efforts of business school educators to promote ethics and integrity by introducing compulsory business ethics courses, revelations of corporate corruption and misconduct keep periodically shaking the markets and questioning an impact of such courses on management behavior. In the aftermath of corporate scandals as Enron, WorldCom and Tyco, business schools were criticized for teaching ‘ideologically inspired amoral’ management theories and practices prioritizing profit maximization and shareholder value (Ghoshal 2005) that ‘marginalize’ teaching of ethics (Mintzberg 2004). These critical views were supported by the next wave of corporate scandals involving such giants as Lehman Brothers, AIG, Siemens, Société Générale, and Goldman Sachs. Moreover, unethical behavior of corporate managers lead to “dramatic failures of corporate governance and risk management” in the largest investment and commercial banks and contributed to the 2007 credit crunch in the US and current financial crisis in the world (Financial Crisis Inquiry Report 2011). These developments support the continuous critique of the quality of business education and provoke further calls for ‘radical changes’ in business education curricula and a more holistic ‘highly integrated, creative and agile approach’ to teaching (Danko 2009).

Indeed, a new approach to business education is especially needed in times of financial crisis in order to re-evaluate and reconsider an understanding of business, its aims, principles, values and responsibilities in the modern society. This is also an opportunity and a “societal obligation for business educators to train this generation to do better” (Cavaliere et al. 2009, at 6). Supporting this idea of the holistic approach to teaching ethics and integrity and driven by an idea of reforming and innovating the business curricula, the Center for Integrity in Business and Government is developing an Integrity Curriculum Framework (ICF) - a series of learning outcomes and guidelines for local curriculum development. In order to ensure ICF’s quality and contextual and practical applicability, CIBG created the Global Integrity Survey that mirrors business sector’s views on integrity education’s impact in practice. The Survey aims to shed the light on what corporate executives and compliance officers think should be part of an integrity education curriculum, what knowledge and skills they expect an MBA graduate to be equipped with,

and what values they find essential to create and maintain an integrity culture on a workplace.

This report consists of four parts: part I offers an overview of the survey, part II focuses on the importance of integrity, part III discusses questions relevant to the content of integrity education curriculum, finally, part IV presents those survey questions that targeted existing corporate actions in the area of keeping integrity culture including compliance programs.

I. Survey Overview

The primary purpose of the survey was to gather views of business regarding the content of the integrity education in business schools. The survey questions were based on focus group discussions with corporate executives and compliance officers held in Budapest in fall 2011 and spring 2012. These discussions were part of the preparation work on the survey and significantly contributed to the structure and wording of the survey questions, so that the vocabulary used was clear to respondents and for the further analysis of the survey. For example, the list of skills and knowledge included in the survey includes those kinds of skills and knowledge that were identified during the preparatory discussions as most significant in practice. This allowed making the survey questions more specific and focusing on issues relevant in practice. Moreover, the last part of the survey contained questions directed at compliance officers only; this approach was suggested by the focus group participants.

The survey was sent to more than three thousand companies all around the world; the target group included C-level managers and compliance officers. The survey was based on an online platform Qualtrix and its confidentiality and anonymity were assured. The survey was distributed in co-operation with the American Chambers of Commerce in Hungary, Slovakia, Romania, Kyrgyzstan, Tajikistan, and Uzbekistan; several other Chambers of Commerce and business associations, business schools and business ethics centers in Europe and North America; and with the support of the focus group participants.

The survey combined closed-ended (rating scale and forced choice) questions and open-ended (free response) questions. The Survey intentionally did not define such concepts as integrity or corruption in order to avoid contextualization and any sort of bias. This

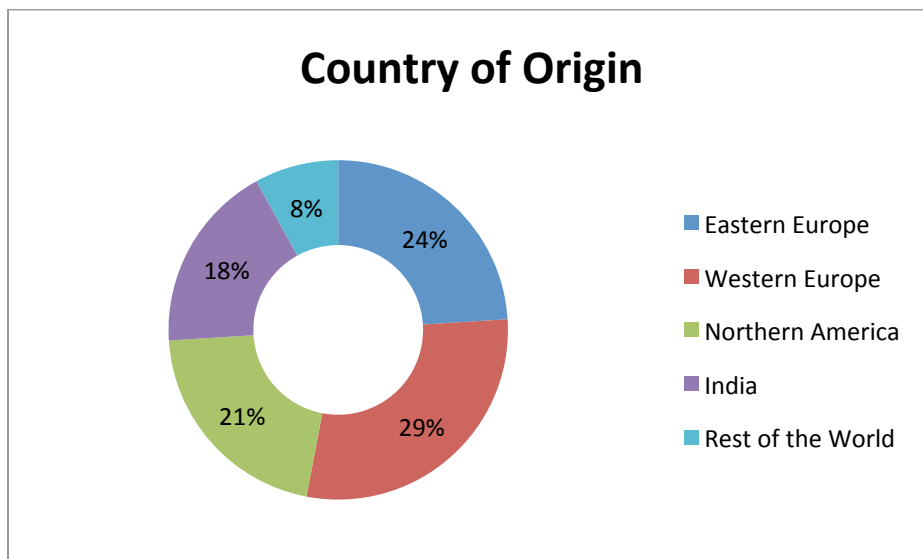
position is also influenced by the opinions of business executives expressed during preparatory focus group meetings who advocated for the avoidance of any firm definitions in the survey.

The total number of received responses was 492, out of which 299 were considered valid. The number of valid responses lowered down due to the fact that some respondents were not willing to answer compulsory open-ended questions. Since one of such compulsory open-ended questions was initially placed in the first part of the survey, the number of respondents left the survey once reaching it. To remedy this situation, all open-ended questions were made optional. In addition, some respondents gave only partial responses, which were nevertheless counted in when their content was acceptable. The latter explains the varying number of responses within the Survey.

Country of origin

Respondent companies were mainly from Western Europe (29 %), Eastern Europe (24%), Northern America (21%), and India (18%). See Figure 1.

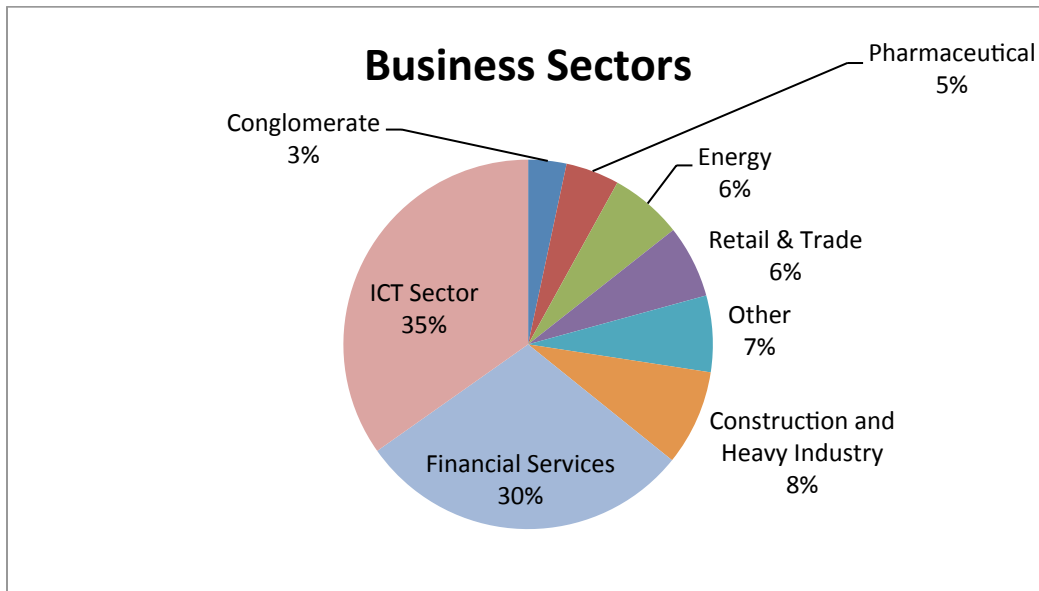
Figure 1. Country of Origin of Respondent Companies



Distribution of sectors where the companies operate

Majority of the companies operate either in ICT Sector (35%) or in financial services (30%); other industries included were: construction, retail, pharmaceuticals and energy. See Figure 2.

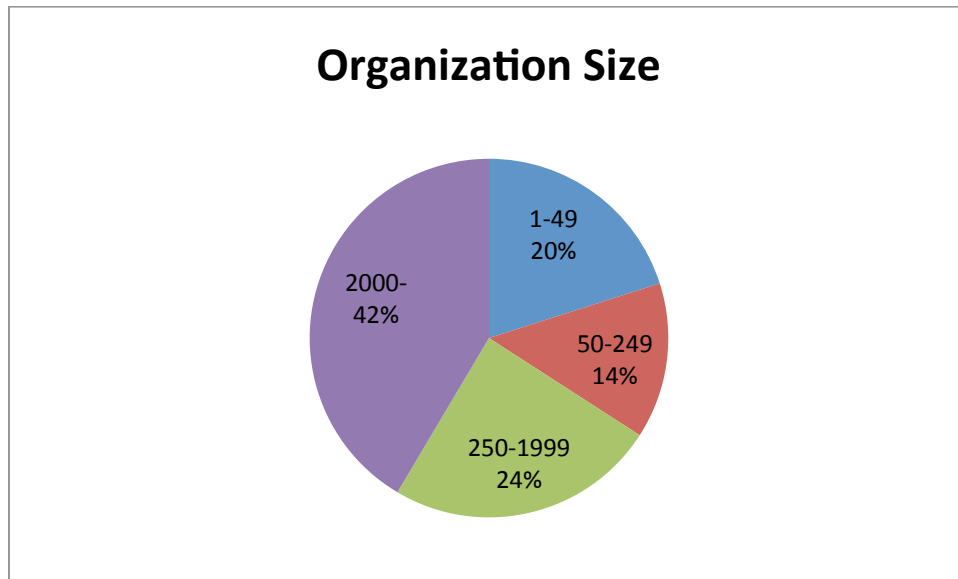
Figure 2. Distribution of Sectors Where Respondents Operate



Size of organizations

42 percent of companies are large multinationals with more than two thousand employees, 34 percent are small businesses employing up to two hundred and fifty employees, and remaining 24 percent are medium size companies. See Figure 3.

Figure 3. Size of Respondent Companies



Markets where companies operate

55 percent of respondents operate globally on multiple markets, 28 percent in Europe, 9 percent in Northern America, and the rest in markets of Asia (4%), Africa (1%), South America (2%) and Middle East (1%). See Figure 4.

Figure 4. Markets Where Respondent Companies Operate



II. Importance of Integrity

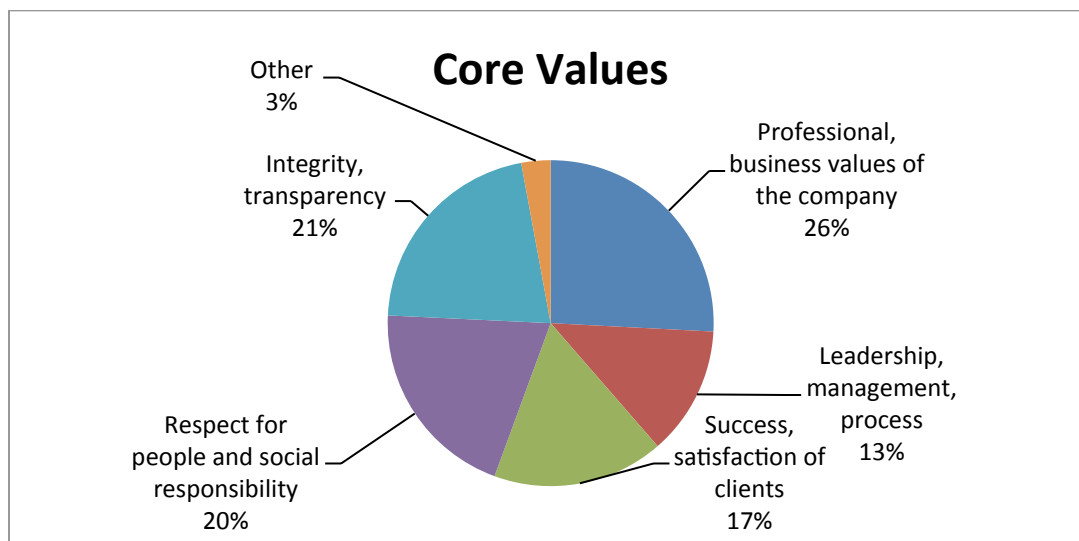
Values included in the mission statements

Integrity is a concept that is both important in business ethics and difficult to define. Integrity became a buzz word included in many modern corporate mission statements and reports. Indeed, the survey results prove that integrity is both important and popular in modern business. Integrity was the most mentioned value in responses for the open-ended question asking to name three values included in respondents' mission statements. Results are shown in Table 1. and Figure 5. The total number of entries for this question was 760.

Table 1. Values included in respondents' mission statements

Value	#	%
1 Integrity	85	11.2
2 Customer Focus	72	9.5
3 Respect	52	6.8
4 Social Responsibility	49	6.4
5 Team & People	44	5.8
6 Innovation	41	5.4
7 Excellence	37	4.9
8 Leadership	32	4.2
9 Transparency	28	3.7
10 Quality	27	3.5

Figure 5. Core Values of Responding Executives



This outcome is supported by other studies and observations of mission statements. In a study analyzing corporate mission statements, integrity was mentioned by 17 firms out of 27 researched (Williams 2008). Moreover, a brief research of mission statements and values of the top ten 2012 Fortune 500 companies¹ shows that 9 of them mention integrity as a corporate value.² Such results may indicate that in the light of continuous corporate scandals companies wish to reassure the public and investors in their commitment to ethics and integrity through the mission statements (Williams 2008)

Further, all responses to the questions discussed above were categorized into the following groups: Integrity & Related Values (includes all responses that contained the word 'integrity' or other comparatively similar notions), Corporate Governance (collects entries that are concerned with the corporate structure, organization, and processes taking place inside of a business entity excluding business operations), and Corporate Management and Business Performance (includes entries referring to the management of business activities and relations with customers, business partners, and markets in general). The results are shown below.

¹ The list of companies is available at:

http://money.cnn.com/magazines/fortune/fortune500/2012/full_list/ (last visited January 30, 2013).

² Exxon Mobil (Standards of Business Conduct: "The Corporation's directors, officers, and employees are expected to observe the highest standards of integrity in the conduct of the Corporation's business." Available at <http://www.exxonmobil.com/Corporate/files/corporate/sbc.pdf>); Wal-Mart Stores (Walmart was built on a foundation of integrity, and our board members and company leaders bring our values to life every day as they serve customers and shareholders. See <http://stock.walmart.com/corporate-governance>); Chevron (Integrity is one of the values, see <http://www.chevron.com/about/chevronway>); ConocoPhillips (SPIRIT values: I is integrity, see http://www.conocophillips.com/EN/about/who_we_are/purpose_values/Pages/index.aspx); General Motors (By developing the world's best vehicles, building upon our strong financial foundation, growing our business and operating with the highest level of integrity, we will continue to deliver positive results. See http://www.gm.com/company/aboutGM/our_company.html); General Electric ("Our company stands for Integrity" See <http://www.ge.com/at/ourCommitment/integrity/index.html>); Berkshire Hathaway (The Company is proud of the values with which it conducts business. It has and will continue to uphold the highest levels of business ethics and personal integrity in all types of transactions and interactions. See <http://www.berkshirehathaway.com/govern/ethics.pdf>); Ford Motor (Integrity is one of the values, see: http://corporate.ford.com/doc/one_ford.pdf); and Hewlett-Packard ("Uncompromising integrity" is a shared value, see <http://www8.hp.com/us/en/hp-information/about-hp/corporate-objectives.html>).

Table 2. Categorizing Mission Statement Values

Category	#	%
Integrity and Related Values	215	28
Intra-corporate Issues	182	24
Corporate Management and Business Performance	363	48

III. Integrity Education Content

III.1. Values

The first question exploring respondents' views on the content of integrity education focused on values and concepts associated with integrity by business people. More precisely, respondents were asked to name values that should be safeguarded in order to achieve integrity. This was an open-ended question; each respondent was asked to name three values. The total number of entries is 634; before categorization, the top ten most mentioned values were as follows in Table 3.

Table 3. Values to be preserved by a company to achieve integrity

Value	#	%
1. Transparency	59	9.3
2. Compliance & Zero Tolerance	54	8.5
3. Honesty	37	5.8
4. Respect	36	5.7
5. Openness & Communication	33	5.2
6. Responsibility	29	4.6
7. Leadership	27	4.2
8. Education & Learning	27	4.2
9. Ethics	25	3.9
10. Morality	23	3.6

As illustrated, respondents find transparency to be the most important value to achieve integrity. Interestingly, five of the top ten values in this question (integrity, respect, responsibility, leadership, and transparency) are also in the top ten in the list of mission

statement values (Table 2). However, after attributing all entries to categories, the picture changed as shown below.

All responses were divided into the following categories: Values, Corporate Policy and Culture, Business Performance, Accountability & Corporate Social Responsibility (CSR), Transparency & Openness, and Education & Training. The results are shown in Table 4.

Table 4. Values that should be preserved to achieve integrity

Category	#	%
Values	197	31
Corporate Policy and Culture	184	29
Business Performance, Accountability & CSR	121	19
Transparency & Openness	88	14
Education & Training	44	7

The next question was an optional open-ended question that offered respondents to add issues they consider important for integrity education. All responses were categorized into categories as demonstrated in Table 5. The total number of relevant entries is 75.

Table 5. What is important for integrity education?

Category	#	%
Values	24	32
Compliance & Corporate Policy	20	27
Knowledge of Corruption	16	21
Other	15	20

The category 'Values' is composed of those answers that named such subjects for integrity education as integrity, ethics, respect, and other values. For instance, several respondents thought that importance of integrity in personal and professional life as well as its benefits for business should be emphasized more often. Moreover, respondents were of opinion that integrity should be taught "as a way of life" and "built into behavior" of prospective managers. Another example is an answer that suggested explaining to students that personal values should be the "founding stone for corporate actions." To the large extent,

majority of responses stressed the same values as integrity, ethics, respect, trust, and responsibility that were in responses to the previous question discussed (Table 3).

‘Compliance & Corporate Policy’ category includes responses mentioning topics linked to compliance and corporate policy, such as: compliance organization, interrelation of compliance office with other company offices (audit, legal), whistleblower and corporate ethics policy, zero tolerance policy, awareness of managers and employees about latest developments in the field of anti-corruption legal instruments and initiatives. Issues regarding compliance were already raised by respondents in the question concerning values needed to achieve integrity (Table 4).

Responses that suggested teaching topics related to corruption, its causes and consequences were collected under ‘Knowledge of Corruption’ category. More specifically, respondents suggested focusing on “cultural perspectives on corruption,” corrupt political environment, causes, and consequences of corruption for companies and society. Moreover, respondents stressed such issues as competitiveness and corruption, human behavior and corruption, lobbying, ways to detect and react to corruption. Finally, responses in the ‘Other’ category cover diverse issues. For example, it was suggested to teach case studies, include internships in the curriculum, or focus on customers and clients.

III.2. Skills & Knowledge related to integrity education

In addition to the two open-ended questions just discussed (Tables 3 & 5), the survey offered eight rating scale questions regarding the content of integrity education. These questions asked respondents to rate four kinds of knowledge and four types of skills in the area integrity and ethics. The applied range for rating listed knowledge and skills was from 5 to 1: extremely important (5), very important (4), somewhat important (3), not very important (2), and not important (1). The results are illustrated in Table 6.

Table 6. Knowledge and skills related to integrity education

Type of Skill or Knowledge	Responses	Mean	SD
Recognizing situations leading to loss of integrity in the company	269	4.34	1.00
Promoting a zero tolerance culture for corruption	268	4.30	1.01
Distinguishing between corrupt and non-corrupt practices	269	4.13	1.13
Risk assessment tools	271	3.93	1.02
Measuring risks and/or costs of corruption for the company	268	3.73	1.19
National and international anti-corruption legislation	275	3.69	1.27
Various compliance programs	275	3.67	1.15
Case studies related to corruption	271	3.63	1.17

The top rated skill supports an idea that integrity is seen by respondents as an important value for business. Importance of integrity is related to the negative consequences that a loss of integrity can cause. Promoting zero tolerance culture was ranked as the second most important skill. This ranking is supported and supports outcomes in other survey questions when zero tolerance and compliance are rated similarly high. For example, it was mentioned among top values to be preserved in order to achieve integrity (Table 4) and suggested as a topic for integrity education (Table 5). In general, zero tolerance culture towards corruption has become an essential company policy in the light of corporate scandals, financial crisis, and enhanced anti-corruption regulation on national and international levels. For example, the enactment of the UK Bribery Act 2010 put pressure on British compliance officers to advance the zero tolerance policy to conform to the new law (Davis & Lukomnik 2011, at 50).

Finally, the skill of distinguishing between corrupt and non-corrupt practices concludes the top three of the most important skills according to respondents' opinion. High ranking of this skill also emphasizes an importance of awareness about corruption; respondents already suggested teaching topics about corruption in the previous survey question about integrity education (Table 6).

IV. Integrity and Corporate Reality

While the abovementioned questions and responses concerned potential areas for the development of integrity education curriculum, the next set of questions cover business reality and integrity issues that respondents face in corporate life.

IV.1. Respondents' knowledge about corruption and loss of integrity

What are challenges related to integrity that business faces in its activities? The survey touched upon this subject and asked respondents to indicate possible costs of the lack of integrity. 92 percent of respondents found that it damages reputation of their companies, 81 percent saw the danger of loss of integrity in deteriorating corporate culture, finally, 66 percent thought that integrity of markets suffer from the lack of corporate integrity (see Table7). Hence, an ability to identify a potential or prominent danger to integrity culture in a company is truly important.

Costs of lack of integrity

Table 7. What are the major costs of lack of integrity for the company?

Answer	#	%
Loss of company reputation	238	92%
Deteriorating corporate culture	209	81%
Damaging integrity of market	170	66%
Loss of competitiveness	142	55%
Deteriorating communication with business partners	131	51%
Financial costs of legal expenses	129	50%
Making difficult to assess risk correctly	124	48%
Threatening human security/health of employees and/or customers	115	44%
Financial costs of bribing	107	41%
Other (please specify):	6	2%

Fostering integrity

Next question continued the topic of lack of integrity culture and asked respondents to rate from least important to the most important (using 1 to 5 scale) in the process of fostering integrity the following statements demonstrated in Table 8.

Table 8. What is the most important in fostering integrity

	Answer	Score
1.	Have strong commitment from top-level management	4,7
2.	Follow best practices	4,4
3.	Find alternative strategies to be competitive without corruption	4,4
4.	Complement informal measures with formal enforcement	4,0
5.	Identify key incentives for managers in different situations to avoid corruption	3,8

While it seems to be clear that respondents see the lack of integrity as a serious problem, requiring a top management commitment, it is interesting to consider whether respondents have knowledge and understanding of corruption. It was the subject matter of the next two questions. First question asked respondents to choose practices that in their view constitute corruption. The outcome is presented in *What constitutes corruption?*

Table 9. and Figure 6. The total number of responses is 265.

What constitutes corruption?

Table 9. What Constitutes Corruption?

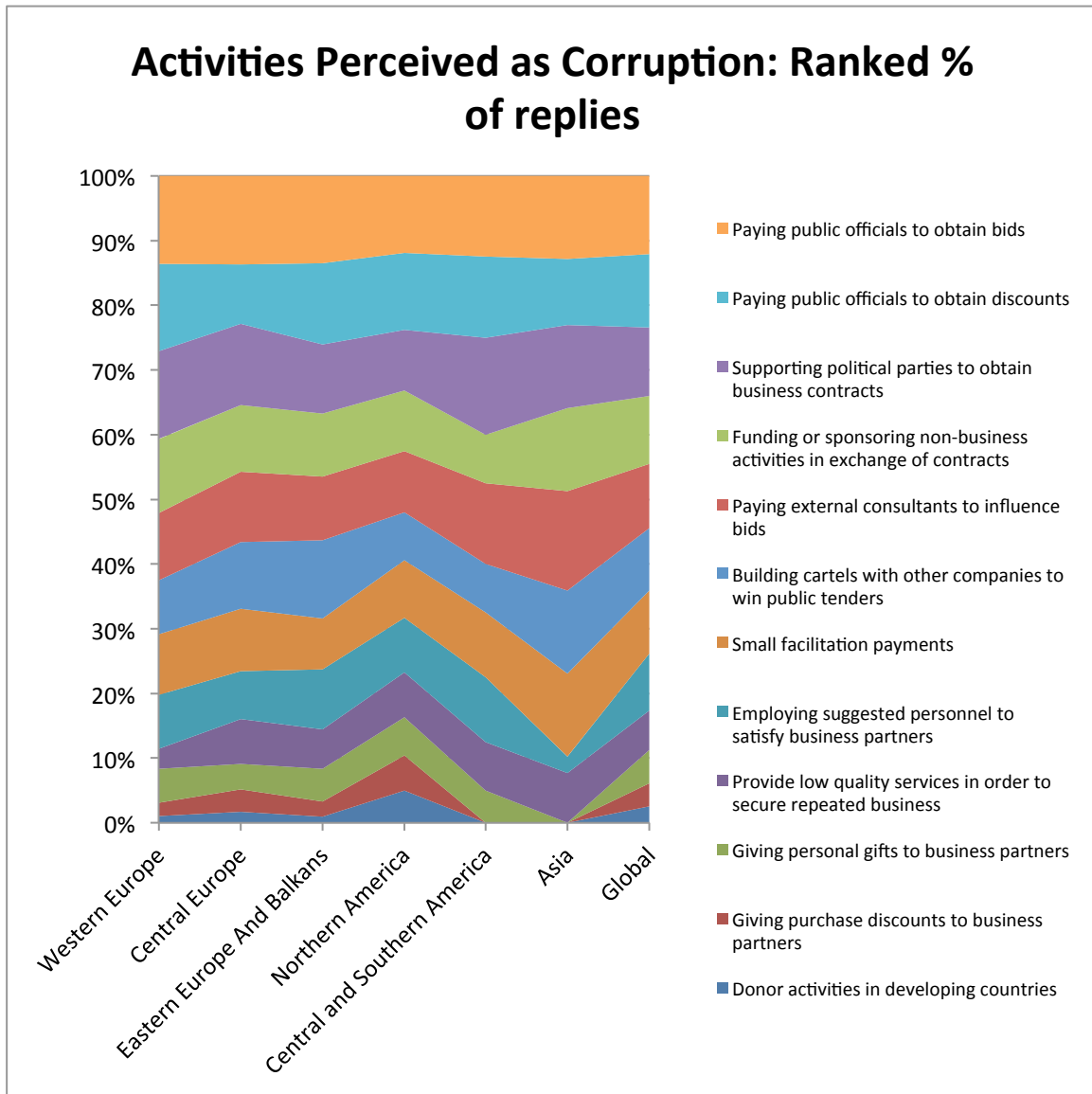
Answer	#	%
Paying public officials to obtain bids	245	92
Paying public officials to obtain discounts	227	86
Supporting political parties to obtain business contracts	214	81
Funding or sponsoring non-business activities in exchange of contracts	201	76
Paying external consultants to influence bids	199	75
Building cartels with other companies to win public tenders	190	72
Small facilitation payments	187	71
Employing suggested personnel to satisfy business partners	167	63
Provide low quality services in order to secure repeated business ³	123	46
Giving personal gifts to business partners	99	37
Giving purchase discounts to business partners	67	25
Donor activities in developing countries	47	18

Overall, obvious examples of public corruption as payments public officials to obtain bids or discounts received high number of responses: 92 and 86 percent respectively. However,

³ This is an example of corruption when a supplier intentionally provides a low quality service in anticipation of the demand of future additional services to fix, amend, or replace the initial one.

more complex and controversial examples of corruption such as supporting political parties to obtain contracts or paying to consultants to influence bids also received an encouragingly high level of responses.

Figure 6. Activities perceived as corruption



Curiously, these responses seem to contradict to results of other surveys that documented lack of knowledge about corruption in business practice. For instance, global surveys conducted by KPMG in 2007 and Ernst & Young in 2008 state that there is lack of

awareness about corruption among respondent companies (KPMG 2007; Ernst & Young 2008).

Knowledge of anti-corruption legal frameworks

Nonetheless, the indicated KPMG and Ernst & Young survey outcomes are in line with our survey results when the awareness of corruption is centered on the knowledge of the anti-corruption laws. Indeed, only 59 percent of respondents knew their national anti-corruption law, whereas the United Nations Convention Against Corruption was known only by 29 percent of respondents. Moreover, 22 percent knew none of the proposed legal instruments. The results are shown in Table 0; the total number of responses is 258.

Table 10. Which of the following anti-corruption legal frameworks do you know?

Legal Instrument	#	%
National	168	65
EU Conventions Against Corruption	104	40
UN Convention Against Corruption	74	29
OECD Convention on Combating Bribery	68	26
None	58	22
Council of Europe Criminal and Civil Law Conventions Against Corruption	49	19
Inter-American Convention Against Corruption	28	11
African Union Convention on Preventing and Combating Corruption	9	3

Such level of awareness of the anti-corruption legal framework correlates with the fact that respondents ranked knowledge of the anti-corruption law lower than, for instance, knowledge of the risk assessment tools or an ability to recognize a corrupt transaction (Table). Knowledge of anti-corruption law may be simply regarded by respondents as the task of legal or compliance offices. Does it also mean that anti-corruption strategy of the company is solely on the shoulders of certain departments?

IV.2. Companies’ anti-corruption strategies

Partially, the answer is yes as the majority of respondents indicated legal and compliance offices as part of the anti-corruption strategy of their companies. However, audit, contracts

and procurement departments follow closely showing a more diversified approach. The results are presented in Table .; the number of responses is 282.

Company departments dealing with anti-corruption strategy

Table 11. Which of the departments is part of your overall anti-corruption strategy?

Office	#	%
Legal	183	65
Compliance	176	62
Audit	169	60
Contract/procurement	148	52
Security	115	41
Social/corporate responsibility	100	35
Public affairs	84	30
None	31	11

In addition to knowing and understanding what is corruption, how it affects company culture and leads to the loss of integrity, and having special departments dealing with it, business executives should ensure that all employees are informed on these issues as well. While respondents continuously stated that knowledge of corruption and related abilities are essential for integrity education (Tables 6. and 8.), a separate set of questions dealt with how they inform their own employees about ethical problems in their companies.

Ways of informing employees on integrity issues

As shown in the next table (Table 12.), a company policy is the most popular tool of awareness raising for employees. Other popular ways of informing employees are through training, sending bulletins, work of a compliance office, and personal communication with the top management.

Table 12. Ways of informing employees about integrity

Answer	Response	%
Company policies	214	83%
Through periodical training of employees	162	63%
Internal bulletins	161	62%
Through the work of compliance officers/dedicated personnel	154	59%
Through personal communication with executives/officers	151	58%
Helplines	104	40%
Company bylaws	70	27%
Other (please specify):	12	5%
No information is provided to employees	8	3%

Sanctioning employees for corrupt behavior

Informing employees about company views on corruption and unethical behavior relates to the area of preventive measures, but what about the enforcement and punishment for corrupt behavior? Would business executives sanction an employee for corrupt activity?

The majority of respondents replied positively as demonstrated below in Table 13.

Table 13. Would you sanction an employee for corruption?

Answer	Response	%
Yes	184	71%
No	45	17%
I don't know	29	11%
Total	258	100%

At first glance, the response to this question seems to be clear cut and predictable, in fact, 29% of respondents said either no or don't know. This reflects an idea that a behavior is not always clearly corrupt or non-corrupt, black or white; a large area of grey requires knowledge and skills to comprehend the situation an employee got involved into before turning to punishment and sanctions.

IV. 3. Role of compliance office and officers

Given that compliance offices and officers are usually at the forefront of preserving integrity and fighting corrupt behavior in companies, the survey devoted several questions to all respondents and several to compliance officers only. The former will be discussed

first. The next questions aimed to see the importance of compliance for respondents and whether they have a specific person who deals with compliance issues (Table . and 15.

Table 14. How important is for you to have a compliance office in a company?

Answer	#	%
Very important	193	68
Fairly important	50	18
Unimportant	27	10
I don't know	12	4
Total	282	100

Table 55. Is there a person in your company who is dedicated to deal with compliance?

Answer	#	%
Yes	231	82
No	51	18
Total	282	100

However, the meaning and understanding of compliance is constantly changing as it may go further than complying with legal regulations and corporate policies. This tendency is demonstrated by the responses for those survey questions that targeted compliance officers. The following three questions aimed to collect views of compliance officers on issues of the utmost importance in their work, successful strategies, and obstacle they face in their work. The first question demonstrated that 83 percent of compliance officers find that involving the top leadership in the integrity programs is the most important aspect of their work. Other responses for this question are exemplified in

Table 1616.

Responses to an open-ended question regarding the most successful strategy in implementing a compliance program were categorized and the results are as follows. The biggest number of entries belongs to the 'Compliance and Corporate Culture' category, which includes responses naming enhanced work of compliance offices, adoption and enforcement of codes of conduct and ethics, awareness and strict compliance with legal and corporate regulations, and zero tolerance policy as the most successful strategy.

Table 16. Rating the importance of a compliance officer/integrity dedicated officer in:

	Not at all Important	Somewhat Unimportant	Neither Important nor Unimportant	Somewhat Important	Very Important
involving top management regarding integrity programs	4	0	2	15	103
adhering to international standards and anti-corruption laws?	4	1	6	24	90
applying best practices in procurement?	6	0	8	29	82
understanding and comparing the exposure of different units in the organization?	5	3	10	30	76
assessing promptly the costs of corruption for the company?	8	6	11	34	64
dealing with empathy in compliance cases?	12	2	19	39	56

‘Training and Communication’ category received 26% of responses, including such strategies as periodic training, raising awareness and open communication are named as tools for success of compliance programs. ‘Leadership Example and Top-Down Approach’ category entries emphasized that a successful strategy comprises involving the top management in compliance related activities and strengthening the link between the top and bottom levels of an organization. Finally, ‘Other’ category collects diverse responses including co-operation with other business actors, increasing competitiveness or creating trust relationships with employees and managers, see Table 67.

Table 67. Most successful strategy in implementing a compliance culture

Category	#	%
Compliance & Corporate Culture	31	42.5
Training & Communication	19	26.0
Other	14	19.2
Leadership Example & Top-Down Approach	9	12.3
Total	73	100

The last question targeting compliance officers was about obstacles they encounter in their work. Respondents were asked to name three different types of obstacles: most important, important, and somewhat important. Each type was categorized individually into several categories, each of them are explained next. ‘Company Leadership and Culture’ category collects all the entries that mark obstacles lying within companies, those related to corporate culture, intra-corporate issues and corporate governance in general. The category of ‘Political and Legal Environment, Social Culture and Traditions’ combines those responses that name politics, legal systems and social norms as obstacles on the way of compliance programs implementation. Further, entries that state business activities and goals as well as market culture in general are collected in the category ‘Business Objectives and Market Environment’. Finally, ‘Education and Training, Lack of Knowledge, Information’ category includes responses naming lack of knowledge and awareness about integrity, corruption, and related areas as obstacles in implementing compliance programs.

Table 18 provides details about the numbers in each category and type of obstacle mentioned.

Table 18. Obstacles in implementing compliance programs

Categories	Most Important		Important		Somewhat Important	
	#	%	#	%	#	%
Company Leadership & Culture	30	34	25	33.8	33	50.8
Political and Legal Environment, Social Culture, Mentality, Traditions	21	23.9	24	32.4	13	20
Business Objectives and Market Environment	21	23.9	18	24.3	13	20
Education and Training, Lack of Knowledge, Information	16	18.2	7	9.5	6	9.2
Total	88	100	74	100	65	100

In general, among the most important obstacles the following mentioned the most: lack of interest in compliance of the management and employees, lack of integrity culture, lack of awareness and understanding of compliance and corruption by management and

employees, cultural norms and traditions, government regulations and bureaucracy, mentality and poverty, seeking financial benefits and business opportunities, competitors' corruption, and performance pressures. Moreover, important obstacles included: lack of awareness and knowledge about compliance and corruption among employees, lack of management commitment, lack of personal integrity, ethics, and sensitivity, focus on short-term goals, fear of losing business, intense competition and time pressure.

Conclusion: Learning outcomes

The results of the Global Integrity Survey represent an attempt to step into the shoes of practicing managers and see what kinds of competencies they expect from MBA graduates. The survey results provide a map of knowledge and skills or learning outcomes that can be used for the development of integrity education curriculum aligned with the interests of the demand side – business practice. The structure of the survey and the content of questions were based on the focus group discussions with executives and compliance officers, which made the survey more comprehensible for practicing managers and focused on specific integrity related issues.

On the basis of our Survey results, managers construct the issue of integrity around a number of factors: training and communication, corporate culture, risk assessment techniques, political and market environment, and individual attitudes. Causal factors that influence the ways in which integrity issue are construed are expectations (generated by previous experience, by professional training, by the current context, and by educational instruction); motivation (such as the toleration of corrupt actions and policies and competitive pressures of the market); social anchoring (in lack of interest or leadership from top management), and representation (resulting in a fragmented sense of integrity and disconnection between different levels in the organization).

Overall, the learning outcomes produced by the survey touch upon diverse areas starting from the personal space such moral values or self-awareness, continuing into work place

and interaction with other colleagues, making business decisions and considering interests of immediate stakeholders, and finishing at external environment that encompasses relationships with governments and other organizations and individuals, and society in general. The breadth of topics demonstrates that integrity related issues appear in nearly all spheres of life and work of practicing managers.

Thus, the survey results support the idea that integrity education should be multidisciplinary and should go far beyond just one course. Hence, the results back up the development of the Integrity Education Curriculum, which will consist of a framework of core and elective courses linked to each other but focusing on specific subjects.

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