

Part I. Introduction

Objective & Purpose

Thank you for electing to complete the Ethics Quotient™ survey developed by the Ethisphere Institute (“Ethisphere”). There is no cost to complete this survey online, and participation is voluntary. The survey is open to any organization, large or small, public or private, for-profit or not-for-profit.

The data captured in the survey is used to calculate your organization’s self-reported Ethics Quotient (EQ). Organizations with higher EQ scores may be designated as candidates for the World’s Most Ethical Company Award. Such companies may be required to provide additional evidence to substantiate their self-reported EQ score. To learn more about the EQ methodology, and the various types of EQ scores, please visit www.ethisphere.com.

Instructions

We ask that this survey be completed by authorized individual(s) with a working knowledge of their organization’s programs and initiatives in the areas of ethics and compliance, corporate governance, and corporate citizenship and responsibility. You may find it useful to download a copy of the EQ questionnaire in advance in order to prepare your responses and collect any information that may be necessary to obtain from other stakeholders within the organization.

Please answer all questions to the best of your ability. All questions are multiple choice questions (single select or multiple select). When considering possible responses to each question, please choose the answer that *best* reflects the *current state* of your program. If there are certain questions for which you feel the answer options provided are inadequate to reflect your program, please include follow up information in the open-ended comments/feedback section at the end of the survey. We strongly encourage you to provide supporting documentation to substantiate your responses. Serious lack of validation may prevent your organization from getting full credit for good performance. For more information on supporting documentation and the ways to provide it, please go to the relevant section of the FAQs page: <http://ethisphere.com/worlds-most-ethical-companies-faqs/>

You can access the survey via the personalized link that appears in the email you received. This link serves as your unique identifier. **You may stop and exit at any time during the survey process, and resume your progress by following the link again.**

If you have any questions or experience technical difficulty, please contact Chris Sindik at csindik@ethisphere.com.

Terms & Conditions

Confidentiality: I am aware that the responses I provide to this survey are confidential unless publicly available otherwise. I understand that my responses will be used by Ethisphere solely to generate an EQ score, and for related anonymous benchmarking. EQ scores for companies are not made public. Ethisphere reserves the right to publish EQ scores at a future date. Companies, however, may request that non-public information provided under the survey be excluded from the calculation of an EQ score. In such any event, any publicly-released EQ score will be solely based upon publicly available information and other data collected by Ethisphere outside of this survey process.

Part II. Demographics

1. Please provide your name, business title and contact information:

Your name:

Business title:

Organization name:

Email address:

Mailing address:

Phone number:

(Please include country code if located outside the United States)

- 1a. Please provide contact information for a person responsible for public relations or media communications for your organization that can serve as a point of contact for Ethisphere should your company score highly on the EQ survey and be considered for the World's Most Ethical Companies list:

Name:

Business title:

Email address:

Phone number:

Mailing address:

2. Do you, the respondent, currently reside in the European Union?

(EU residents will be provided a consent statement in compliance with EU Data Privacy laws)

A. Yes

B. No

Skip logic: If B, move to q4

3. EU Consent Statement

Your participation in this survey is optional. Your responses and personal information will be gathered, analyzed, used and protected in accordance with

applicable data privacy laws and Ethisphere's Data Privacy Policy. Ethisphere will process all responses and your personal information in the United States.

Select "Yes" to begin the survey or "No" if you do not wish to proceed with the survey.

- A. Yes
- B. No

4. Please select which type of organization you represent:

- A. Public company
- B. Private company
- C. Educational/research institution/not-for-profit/ other

5. Select your organization's primary industry:

(If your organization spans multiple industries, select the one that most closely describes the organization's primary activities)

- A. Aerospace and defense
- B. Agriculture, forestry, fishing and hunting
- C. Banking
- D. Business services
- E. Chemicals
- F. Computer software
- G. Computer hardware
- H. Computer services
- I. Construction
- J. Consumer products manufacturing
- K. Consumer services
- L. Education
- M. Electronics
- N. Energy, oil and gas
- O. Environmental services, equipment and remediation
- P. Financial services
- Q. Food and beverage products manufacturing
- R. Food service
- S. Healthcare products
- T. Healthcare services
- U. Industrial manufacturing
- V. Insurance
- W. Leisure and hospitality
- X. Media
- Y. Metals and mining
- Z. Non-profit
- AA. Pharmaceuticals and biotechnology
- BB. Professional, scientific and technical services
- CC. Real estate
- DD. Retail

- EE. Security products and services
- FF. Telecommunication equipment
- GG. Telecommunication services
- HH. Transportation and logistics
- II. Utilities
- JJ. Wholesale trade

6. Select the total size of your organization's workforce:
 - A. Less than 100 employees
 - B. 100 – 499 employees
 - C. 500 – 999 employees
 - D. 1,000 – 9,999 employees
 - E. 10,000 – 24,999 employees
 - F. 25,000 – 49,999 employees
 - G. 50,000 – 99,999 employees
 - H. Over 100,000 employees
7. Select your organization's total annual revenue in U.S. dollars:
 - A. Less than \$20 million
 - B. \$20 – 50 million
 - C. \$50 – 100 million
 - D. \$100 – 200 million
 - E. \$200 - 500 million
 - F. \$500 million – \$1 billion
 - G. \$1 – 5 billion
 - H. Over \$5 billion
8. Does your organization do business in countries known for being at a moderate to high risk for corruption?
(Please refer to the [Transparency International Corruption Perception Index](#) for clarification).
 - A. Yes
 - B. No

Part III. Reputation, Innovation and Leadership

1. Please rate your organization's overall record of integrity, business ethics, legal and regulatory compliance in the past five years:
 - A. Superior (better than most organizations)
 - B. Average
 - C. Inferior (worse than most organizations)
 - D. Not sure/Decline to answer

2. Rate your organization's overall reputation with customers, suppliers, media and the general public:
 - A. Superior (better than most organizations)
 - B. Average
 - C. Inferior (worse than most organizations)
 - D. Not sure/Decline to answer

3. Rate your organization's internal culture of ethics:
 - A. Very strong
 - B. Strong
 - C. Fair
 - D. Weak
 - E. Very Weak
 - F. Not sure/Decline to answer

4. In the past five years, which of the following (if any) apply to your organization (or any members of senior leadership):
 - Named in a class-action law-suit
 - Defendant in a serious civil action (e.g. tort) related to business activities
 - Defendant in a qui tam action
 - Under a government investigation
 - Achieved a settlement with or without admission of liability
 - Subject to a deferred prosecution or non-prosecution agreement
 - Subject to a corporate integrity agreement
 - Required to have a compliance monitor
 - Indicted
 - Paid substantial fines and/or penalties related to a compliance failure
 - Dismissed executive(s) or received resignations from executive(s) due to actual (or alleged misconduct)

5. Has your organization earned any of the following media recognitions within the past five years?
 - Fortune: 100 Best Companies to Work For
 - Fortune: World's Most Admired Companies
 - Fortune: Most Accountable Big Companies
 - Newsweek: Green Rankings (top 50 overall or top 10 in industry)
 - Barron's: World's Most Respected Companies
 - Bloomberg: The World's 25 Unsung Innovative Companies
 - Working Mothers: Best Companies
 - Forbes/Audit Integrity: 100 Most Trustworthy Companies
 - CRO: 100 Best Corporate Citizens
 - Ethisphere: World's Most Ethical Companies
 - Diversity MBA: Top 50 Companies for Diverse Managers to Work
 - Directorship Magazine: Boardroom Leaders
 - Fast Company: World's Most Innovative Companies

Other (please specify, 200 characters max) _____

6. Has your organization earned any of the following awards or recognitions in the past five years?

- Better Business Bureau: Torch Award and/or Integrity Award
- Malcolm Baldrige National Quality Award
- Ceres Sustainability Reporting Award
- Corporate Register CR Reporting Award
- Corporate Knights: Global 100 Most Sustainable Corporations
- Dow Jones Sustainability Index
- FTSE4Good Index
- Global Challenges Index
- J.D. Power and Associates award(s) and/or certification
- U.S. EPA Energy Star Partner of the Year
- Governance Metrics International: 20 Most Responsible Companies
- Human Rights Campaign: Best Places to Work for LGBT Equality
- Interbrand: Best Global Brands
- Other (please specify, 200 characters max) _____

7. Is your organization **currently** featured by any the following indices?

- FTSE4Good
- DJSI
- Global Challenges Index
- Other (please specify, 50 characters max) _____

8. If your organization is a founding member and/or an actively participating (e.g. attending events, involvement in initiatives) member of the following groups, please select those that apply. If your organization is both a founding and active member, please choose both options as appropriate.

Founding Member Active Member

- | | | |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | Corporate Executive Board |
| <input type="checkbox"/> | <input type="checkbox"/> | The Conference Board |
| <input type="checkbox"/> | <input type="checkbox"/> | Ethics and Compliance Officers Association |
| <input type="checkbox"/> | <input type="checkbox"/> | Practicing Law Institute |
| <input type="checkbox"/> | <input type="checkbox"/> | Society of Corporate Compliance and Ethics |
| <input type="checkbox"/> | <input type="checkbox"/> | Business Roundtable |
| <input type="checkbox"/> | <input type="checkbox"/> | Ethics Resource Center |
| <input type="checkbox"/> | <input type="checkbox"/> | International Corporate Governance Network |
| <input type="checkbox"/> | <input type="checkbox"/> | Better Business Bureau |
| <input type="checkbox"/> | <input type="checkbox"/> | Other (e.g. industry groups): list here (200 characters) |

Part IV. Corporate Governance

1. Please indicate if your organization is rated by any of the following governance rating agencies. If so, please provide the score if available:

- ISS/Risk Metrics GRid™ Rating (High, Medium, Low):
 Board Structure: _____
 Compensation: _____
 Audit: _____
 Shareholders Rights: _____
- GMI: Global Rating _____
- GMI: Home Rating _____
- Other (please specify) _____

2. Does your organization have a governing authority, such as a Board of Directors, Board of Governors or Board of Advisors?

- A. Yes
- B. No

Skip logic: If B, go to Q8

3. How often does the full Board of Directors or other governing authority meet?

- A. Less than once per year
- B. At least annually
- C. More often than annually

4. Does your organization have a “red flag” or other alert process to bring critical issues to the Board’s attention?

- A. Yes
- B. No

5. Is it your organization’s current practice to rotate the physical location of your Board (or other governing body) meetings to locations of various business units and/or field operations?

- A. Yes
- B. No

6. Has your organization assigned responsibility for the primary oversight of risk management within the organization to a specific member of the Board, a Committee or other governing authority?

- A. Yes
- B. No

7. How often does the person responsible for risk management in your organization formally communicate with the Board of Directors or other governing authority?

- A. Regularly scheduled, more often than quarterly

- B. Regularly scheduled, quarterly
 - C. Regularly scheduled, three times per year
 - D. Regularly scheduled, twice per year
 - E. Regularly scheduled, annually
 - F. Ad hoc only, as needed
8. Does your organization have a dedicated risk management function?
- A. Yes
 - B. No
 - C. Risk is a shared responsibility of more than one other functional area
9. What is the title of the person in charge of risk management within your organization?
- A. Chief Risk Officer (or other Chief Executive level)
 - B. Executive, Senior or Vice President (or similar level)
 - C. Director (or similar level)
 - D. Manager (or similar level)

Part V. Compliance and Ethics Program

Subpart 1. Program Structure, Responsibility and Resources

1. Please specify the job title(s) of the person given **primary** responsibility for the compliance and ethics program/initiatives:
- A. Chief Compliance Officer and/or Chief Ethics Officer
 - B. General Counsel
 - C. Head of HR
 - D. CEO/President
 - E. Other senior executive, Vice President or functional head
 - F. Director (mid-level management) or Manager (frontline management)
 - G. Other (please specify)_____
2. Does the individual with primary responsibility for the compliance and ethics program have a direct reporting line to the Board, a Committee or other governing authority?
- A. Yes
 - B. No
3. Indicate your level of agreement with the following statement:
“The person with responsibility for the ethics and compliance program has been given adequate authority and resources to perform the job effectively:”
- A. Strongly agree
 - B. Agree
 - C. Neutral

- D. Disagree
- E. Strongly disagree

4. Identify which of the following authorities the person with responsibility for the ethics and compliance program is granted:

- Ability to author and/or recommend new business conduct policies
- Ability to revise the Code of Ethics and Business Conduct
- Primary budget responsibility for all compliance and ethics programs
- Primary hiring authority for all ethics- and compliance-related positions
- Input on other hiring/firing decisions regarding positions of authority which may affect compliance functions (e.g. Audit, Finance, HR)
- Final approval authority for field compliance operations/initiatives
- Significant input/role in strategic business development decisions such as new market entry, expansion, business partnerships/alliances, joint ventures, mergers and acquisitions, and divestments, including related due diligence
- Significant input/role in product decisions such as product development, launch, or discontinuation
- Significant input/role in procurement decisions such as product/supplier sourcing strategy, including supply-chain due diligence and oversight.

5. If applicable, select the following that characterize your organization's compliance and ethics environment:

- Strong senior executive support for compliance and ethics function
- Actively engaged Board of Directors (or other governing authority)
- Strong tone at the top
- Strong tone at the middle
- Broad organizational perception that compliance is an important strategic function
- No pressure to meet business objectives at all cost
- Ethics and integrity considerations play a key role in business decisions
- Good organizational support for compliance and ethics initiatives
- Adequate staffing for compliance and ethics function
- Adequate financial resources available for compliance and ethics activities
- Adequate technology to enable successful implementation of compliance and ethics initiatives (e.g. training)

6. Select the types of interactions the ethics and compliance function has with other functional groups in your organization:

- Invited/allowed to attend audits
- Invited/allowed to attend HR training events
- Invited/allowed to add compliance/ethics questions to employee surveys
- Invited/allowed time on sales/marketing agendas
- Invited to provide formal input on corporate business strategy

7. Does your organization maintain an internal committee dedicated to compliance and ethics (e.g. a compliance and ethics steering committee)?
- A. Yes
 - B. No

Skip logic: if B, go to 11

8. Select the following that applies to your internal compliance and ethics committee

- Executive level committee
- Manager level committee
- Cross-functional committee
- Committee has a charter or written guidelines
- There is not formal committee, but there is ad hoc group of internal stakeholders that meets as needed

9. How often does the internal ethics and compliance committee meet?

- A. Regularly scheduled, more often than quarterly
- B. Regularly scheduled, quarterly
- C. Regularly scheduled, three times per year
- D. Regularly scheduled, twice per year
- E. Regularly scheduled, annually
- F. Ad hoc only, as needed

10. Indicate which topics are discussed during the internal ethics and compliance committee meetings

- Overall program performance and key program initiatives
- Hotline and reporting statistics
- Misconduct investigations and resolutions
- Training and communication initiatives
- Compliance and ethics program assessment and/or benchmarking
- Compliance and ethics risk management
- Culture of ethics
- Significant regulatory and legal updates
- Industry trends and best practices updates
- Other (please specify) _____

11. Does your organization employ an ombudsperson?

- A. Yes
- B. No

12. What is the approximate full-time employee equivalent dedicated to ethics and compliance function/activities?

- A. One employee or less than one full-time equivalent
- B. 2-3 employees
- C. 4-5 employees
- D. 6-10 employees
- E. 11-20 employees
- F. 21-30 employees
- G. 31-50 employees
- H. Over 50 employees

13. What are the approximate annual costs incurred by ethics- and compliance-related activities within your organization? (Excluding personnel costs and related overhead)

- A. Less than \$50,000
- B. \$50,000 - \$149,999
- C. \$150,000 - \$249,999
- D. \$250,000 - \$499,999
- E. \$500,000 - \$999,999
- F. \$1,000,000 - \$4,999,999
- G. \$5,000,000 - \$9,999,999
- H. More than \$10,000,000

Subpart 2. Program Oversight, Tone at the Top and the Middle

1. Please indicate your level of agreement with the following statement:

“The Board of Directors and/or a Board Committee (or other governing authority) is actively engaged in providing oversight of our organization’s compliance and ethics program”:

- A. Strongly agree
- B. Agree
- C. Neutral
- D. Disagree
- E. Strongly disagree

2. Has the Board delegated the oversight of the compliance and ethics program to a Board Committee (e.g. Audit Committee)?

- A. Yes
- B. No

Skip logic: If no, go to Q4

3. How often does the Board Committee meet?
 - A. Regularly scheduled, more often than quarterly
 - B. Regularly scheduled, quarterly
 - C. Regularly scheduled, three times per year
 - D. Regularly scheduled, twice per year
 - E. Regularly scheduled, annually
 - F. Ad hoc only, as needed

4. How often does the person with responsibility for the ethics and compliance program communicate with the Board of Directors, a Board Committee or other governing authority (if communicates with both the full Board as well as with a Board Committee with various frequencies, please select the most frequent scenario)?
 - A. Regularly scheduled, more often than quarterly
 - B. Regularly scheduled, quarterly
 - C. Regularly scheduled, three times per year
 - D. Regularly scheduled, twice per year
 - E. Regularly scheduled, annually
 - F. Ad hoc only, as needed

5. Indicate which information (if any) your organization reports to the Board and/or Board Committee:
 - Overall compliance and ethics program performance and key initiatives overview
 - Hotline and misconduct reporting statistics
 - Details on misconduct investigations and resolutions
 - Compliance and ethics training initiatives and results
 - Compliance and ethics communication initiatives
 - Compliance program audit, assessment and/or benchmarking findings
 - Compliance risk assessment findings
 - Compliance risk mitigation strategy and tactics
 - Culture of ethics assessment or survey findings
 - Significant regulatory and legal updates
 - Compliance and ethics, trends, industry trends and best practices updates

6. In the past two years, has your organization's Board of Directors (or other governing authority) received formal training on the Code of Conduct and Board oversight responsibilities?
 - A. Yes
 - B. No
 - C. No, but we do distribute the Code of Conduct

D. Not sure

7. Please indicate your level of agreement with the following statement:

“Our organization’s senior executives regularly and consistently communicate with employees regarding the proper standards of conduct, ethics and compliance”:

- A. Strongly agree
- B. Agree
- C. Neutral
- D. Disagree
- E. Strongly disagree

8. Select which types of communication involving **senior executives** (e.g. CEO, Chief Compliance Officer, other C-suite member) are used within your organization to discuss ethics and compliance:

- Personalized letter of introduction to the written Code of Conduct
- Personalized introduction to ethics and compliance training
- Emails to the workforce
- Onboarding video
- Intranet site video
- Podcast
- Town hall, annual kick-off or other organization-wide meetings lead by senior leadership
- Internal meetings involving senior leadership
- Interactive Q&A forum, chat functionality
- Compliance & ethics blog by member(s) of senior leadership
- Newsletter

9. Does **senior executive leadership** include examples of *personal* (private or business related) *ethical decisions* in these communications?

- A. Yes
- B. No

10. Indicate your level of agreement with the following statement:

“The organization’s mid-level managers regularly and consistently communicate with employees regarding the proper standards of conduct, ethics and compliance.”

- A. Strongly agree
- B. Agree
- C. Neutral
- D. Disagree
- E. Strongly disagree

Subpart 3. Due Care

1. Does your organization conduct background checks of individuals in positions of trust (where permitted by law)?

- A. Yes
- B. No

Skip logic: If B, go to Subpart 4, q1

2. Who is included within a “position of trust?”

- Chief Executive personnel
- Vice President level personnel
- Director level personnel
- Managers with direct reports
- Managers without direct reports
- Personnel with compliance responsibilities and/or functions
- Personnel within the Human Resources function
- Personnel within the Finance and/or Accounting function
- Key personnel within the Procurement function
- Personnel within the Internal Audit function
- Personnel within the Information Technology function
- Personnel within the Corporate Security function
- This distinction is currently not defined at my organization

3. Please indicate when background checks are generally performed:

- Hiring
- Promotion
- On a periodic basis (every several years)

Subpart 4. Written Standards

1. Does your organization maintain an organization-wide written Code of Ethics and Business Conduct (“Code”)?

- A. Yes
- B. No

Skip logic – for “B” answer, skip to q5. For “A,” go to the following statement, then go to q2

If your Code is not publicly available on your website, please email a copy to csindik@ethisphere.com.

2. How often does your organization normally review or benchmark the written Code?

- A. Annually
- B. Every two to three years

- C. Every three to five years
- D. Every five to ten years
- E. Less frequent than ten years

2a. When was your Code last updated?

- A. Currently updating
- B. 2011
- C. 2010
- D. 2009
- E. 2008
- F. 2007
- G. 2006
- H. 2005
- I. 2004
- J. 2003
- K. 2002
- L. 2001
- M. Before 2001

3. Is the Code document formally distributed to employees?

- A. Yes, to all employees
- B. Yes, to some (but not all employees)
- C. No

4. Does the Code document distribution include an acknowledgement form that must be completed, collected and maintained?

- A. Yes
- B. No

5. Does your organization maintain written stand-alone policies (in addition to or in lieu of the Code) that address the following issues? Select all that apply:

- Antitrust/competition
- Fair dealing (fair business practices)
- Conflicts of interest
- Gifts and entertainment
- Political contributions, activities and lobbying
- Bribery and corruption
- Data privacy (employees, customers and/or consumers)
- Confidential information/information security
- Social media
- Insider trading
- Records management and retention
- Financial integrity and fraud
- Money laundering
- Procurement integrity/dealing with suppliers/supply chain oversight
- Fair employment/labor standards

- Equal employment opportunity, diversity, discrimination
- Workplace harassment
- Environmental protection
- Workplace health and safety

6. Please indicate your level of agreement with the following statement:
"Our organization's policies in general are comprehensive, clear, consistent, well communicated and are easily available to employees":
- A. Strongly agree
 - B. Agree
 - C. Neutral
 - D. Disagree
 - E. Strongly disagree
7. Does your organization have a documented process for policy creation, and periodic policy review and update (e.g. a "policy on policies")?
- A. Yes, this process is organization-wide
 - B. Yes, but it applies only to certain parts of the organization (e.g. some functions or business units) (please specify) _____
 - C. No

Subpart 5 Compliance and Ethics Training and Communication

1. Does your organization provide compliance and ethics training to its workforce?
- A. Yes
 - B. No

Skip logic: If B, go to q12

2. Does your organization have a written training plan?
- A. Yes
 - B. No

3. Please select the following that apply to your organization's training plan:

- We have a multi-year strategic training plan
- We have an annual training plan
- Our training plan is a product of cross-functional collaboration
- Our training plan includes multi-topic curriculum
- Our training plan includes defined target audiences
- Our training plan includes target completion rates

- Our training plan addresses training frequency
- Our training plan addresses modality of training delivery
- Our training plan includes roll out schedules
- Our training plan includes stated goals and objectives
- Our training plan includes metrics to measure effectiveness (other than training completion rates)

4. Does your organization's training program include training on the Code of Ethics and Business Conduct ("Code")?
- A. Yes
 - B. No

Skip logic: if B, go to q9

5. What percentage of your organizational workforce has received training on the Code in the past 2 years?
- A. 90-100%
 - B. 70-90%
 - C. 50-70%
 - D. 30-50%
 - E. Less than 30%

6. Which statement best describes your Code training audience?
- A. All employees
 - B. Only salaried/office employees
 - C. All salaried/office employees and some hourly employees
 - D. Some salaried employees; all or most employees in key office functions and all management
 - E. All or most employees in key office functions
 - F. All management employees
 - G. Some management employees
 - H. Senior executives only

7. Is the Code training mandatory?
- A. Yes for all employees
 - B. Yes for some (but not all) employees (please specify) _____
 - C. No, we do not make this training mandatory

8. Please select any of the following aspects that apply to your Code training program:

- Part of new employee orientation process.
- Conducted on a periodic basis, at least every two years on average
- Content is reviewed and refreshed periodically, at least every two years

- Includes an acknowledgement/certification form that must be completed, collected and maintained
- Tracked for completion
- Includes testing
- Testing results are tracked and maintained
- Completion of training is a part of an employee performance evaluation

9. Does your organization offer any of the following targeted training programs in addition to or instead of the dedicated Code of Conduct training? (Please select all that apply):

- Antitrust/competition
- Fair dealing (fair business practices)
- Conflicts of interest
- Gifts and entertainment
- Political contributions, activities and lobbying
- Bribery and corruption
- Data privacy (employees, customers and/or consumers)
- Insider trading
- Records management
- Financial integrity and fraud
- Money laundering
- Procurement integrity/dealing with suppliers/supply chain oversight
- Fair employment/labor standards
- Equal employment opportunity, diversity and discrimination
- Workplace harassment
- Environmental protection
- Workplace health and safety

10. Does your organization provide targeted training to managers/supervisors on their special responsibilities with regards to ethic and compliance?

- A. Yes
- B. No

Skip logic: if B, go to 13

11. Select the following that applies to the manager training on ethics and compliance

- Conducted as a part of new manager orientation (upon hire or promotion)
- Conducted on a periodic basis, at least every two years on average
- Content is reviewed and refreshed periodically, at least every two years
- Includes an acknowledgement/certification form that must be completed, collected and maintained
- Tracked for completion
- Includes testing
- Testing results are tracked and maintained

Completion of training is a part of a manager performance evaluation

12. Select the following topics that are addressed by the manager training on ethics and compliance

- Tone from the middle: how to communicate ethics to one's subordinates and promote the culture of ethics and compliance
- How to incorporate ethics in business decision making
- How to encourage employees to speak up, express concerns and report misconduct
- How to handle employee concerns or reports of misconduct
- Non-retaliation
- Manager's accountability for misconduct by subordinates

13. How long has your ethics and compliance training program been established?

- A. 1 year or less
- B. 2-3 years
- C. 3-5 years
- D. 5-10 years
- E. More than 10 years

14. How often do you evaluate the performance/effectiveness of your training program?

- A. At least once or twice a year
- B. Once every 2-3 years
- C. As needed, but generally less frequently than every 3 years
- D. We have not yet evaluated our training program

15. Please select the all of the communication initiatives (aside from formal training programs) dedicated to, or explicitly used to, communicate ethics and compliance messages within your organization:

- Company e-Bulletin/newsletter
- Printed and/or electronic informational materials (such as brochures, guidebooks, posters, wallet cards, table tents and/or checklists)
- Videos/DVDs
- Emails
- Podcasts
- Town hall meetings
- Corporate kick-off meetings
- Senior executive meetings
- Intranet portal dedicated to ethics and compliance
- Ethics blog or intranet forum
- Interactive scenarios, games, quizzes and/or vignettes
- Periodic compliance "road show" or "retreat"
- Ethics-related promotional/merchandising items

- Signature/branded integrated communication programs (e.g. “Compliance Month,” “Ethics Everywhere”)

16. Please select the answer that best reflects the frequency of ethics and compliance communications:

- A. Communication is ongoing (at least several times per month) for the entire organization
- B. Communication is ongoing (at least several times per month) for some parts of the organization, while the rest of the organization is addressed less frequently
- C. Communication is ongoing (at least several times a month) and addresses some parts of the organization, while the rest of the organization is addressed less than once a year or not at all
- D. Communication is periodic (a few times a year), but not ongoing
- E. Communication is infrequent (less than once a year)

17. Please select the answer that best reflects the intended internal audience of ethics and compliance communications:

- A. Communications cover all or most of the organization
- B. Communications cover specific functions, levels or business units
- C. Communication covers very few employees

18. Does your organization maintain a written ethics communication plan?

- A. Yes
- B. No

Skip logic, if B, go to Subpart 6, q1

19. Please select the answer that best reflects the nature of your ethics communication plan

- A. Fully integrated part of the combined training and communication plan
- B. Stand-alone plan that is aligned with the training plan/initiatives
- C. Stand-alone plan that is independent from training initiatives

20. Please select the following that apply to your organization's ethics communications plan:

- We have a multi-year strategic communication plan
- We have an annual communication plan
- Our communication plan is a product of cross-functional collaboration
- Our communication plan includes a variety of topics/subjects
- Our communication plan includes defined target audiences
- Our plan addresses communication frequency
- Our plan addresses communication delivery mechanism (email, web posting, newsletters, manager toolkits, etc.)

- Our communication plan calls for implementation by different functions or business units (e.g. Compliance, HR, Finance, Sales)
- Our communication plan envisions message delivery by different stakeholders (e.g. CEO, Chief Compliance Officer, Heads of other functions and/or business units, other managers, etc.)
- Our communication plan includes roll out schedules
- Our communication plan includes stated goals and objectives
- Our communication plan includes metrics to measure effectiveness

21. Please select the following ethics and compliance communication resources (if any) that your organization provides to managers/supervisors in order to help them promote ethics and compliance within the organization

- Ethics and compliance communication toolkit(s)
- Regular communication from Compliance and Ethics function specifically directed at managers that can be disseminated among employees
- Meetings/seminars with Compliance and Ethics personnel (e.g. brown bag lunches)
- Intranet resources on compliance and ethics specifically directed at managers
- Printed materials on compliance and ethics specifically directed at managers (such as leaflets or guidebooks)
- Ethics and compliance subjects are periodically raised/discussed at manager level business meetings

Subpart 6. Monitoring and Auditing

1. Does your organization require periodic conflict of interest certifications and/or disclosure from certain employees?

- A. Yes
- B. No

Skip logic: if B, go to q3

2. The following employee segments have been subject to conflict of interest certification/disclosure in the past 24 months (Please select all that apply):

- Executive level
- Vice Presidents
- Directors
- Managers
- Internal Audit
- All or most employees in sales and marketing function
- All or most employees in procurement function
- All or most employees in finance function
- All or most employees in HR function

- All of most employees in legal function
- All of most employees in IT function

3. Does your organization track employee gifts and entertainment?

- A. Yes
- B. No

Skip logic: if B, go to q5

4. Please select the following that applies to your gift and entertainment tracking

- We track gifts received by our employees
- We track entertainment provided to our employees
- We track gifts given by our employees
- We track entertainment provided by our employees
- We track all gifts and/or entertainment regardless of value
- We track only those gifts and/or entertainment that exceed the value threshold allowed
- We use an automated tracking tool
- The tool allows for advance approval
- The tool allows for retroactive notification/disclosure
- The tool allows for cumulative tracking per gift or entertainment recipient as well as by his/her organization
- The tracking process is company-wide

5. Does your organization maintain a misconduct reporting or “whistleblower” system?

- A. Yes
- B. No

Skip logic: if B, go to q8

6. The reporting mechanism permits the following (Select all that apply):

- Reporting actual or suspected criminal misconduct
- Reporting actual or suspected violations of organizational Code or policy(s)
- Seeking guidance regarding ethics and compliance issues
- Expressing concerns

7. Please indicate available resources, methods or channels for reporting misconduct and raising concerns (select all that apply):

- Open door/in-person: Supervisor
- Open door/in-person: Skip level supervisor.
- Open door/in-person: Senior/executive management
- Board of Directors or a Committee
- Ombudsman
- Legal, compliance or ethics department/function

- Human Resources
- Ability to remain anonymous *where allowed by applicable laws
- Third party-maintained hotline
- In-house hotline
- Multiple-language reporting capability
- Web reporting: intranet access
- Web reporting: internet/public access
- Live chat functionality

8. How often does your organization conduct risk assessments to determine compliance-, regulatory- and ethics-related risks?
- A. Annually
 - B. Every two years
 - C. Every three years
 - D. Every four years
 - E. Every five years
 - F. Less often than every 5 years
 - G. My organization does not conduct risk assessments at this time

Skip logic: if G, go to q10

9. Which of the following types of risk are reviewed during the risk assessment (Select all that apply)?
- Criminal compliance misconduct (e.g. antitrust)
 - Civil compliance misconduct (e.g. harassment)
 - Ethical compliance misconduct (e.g. conflicts of interest)
 - Operational risk
 - Reputational risk
 - Personnel risk

10. How often does your organization conduct a formal evaluation or benchmarking of your overall compliance and ethics program?
- A. Annually
 - B. Every two years
 - C. Every three years
 - D. Every four years
 - E. Every five years
 - F. Less often than every five years
 - G. My organization does not conduct a formal evaluation or benchmarking of our overall compliance and ethics program

Skip logic: if G, go to q12

11. Which components of the program are evaluated? (Select all that apply)
- Organizational health and culture of ethics
 - Employee knowledge of compliance issues

- Code of Ethics and Business Conduct
- Policies
- Training program
- Ethics communications
- Due care
- Procedures and controls
- Whistleblowing system
- Investigation process
- Board oversight

12. Does your organization's business model rely substantially on vendors/suppliers?

- A. Yes
- B. No

Skip logic: if B, go to q16

13. How would you rate the level of oversight of your suppliers?

- High
- Above average
- Average (neither high nor low)
- Below average
- Low

14. What mechanisms does your organization use to ensure supplier compliance with ethical and legal standards?

- Our organization maintains a procurement policy that addresses key aspects of supplier selection, management and compliance oversight
- Our organization maintains a written Supplier Code of Conduct
- Supplier acknowledgement and compliance with the Code is a required condition of doing business with the organization
- Supplier contracts include explicit provisions regarding supplier compliance
- Our organization's hotline and some other reporting mechanisms are available to use for supplier personnel
- Our organization encourages or requires suppliers to maintain a reporting hotline or other reporting mechanism.
- Our organization conducts due diligence when selecting suppliers
- Supplier due diligence include ethics and compliance considerations
- Our organization conducts ongoing monitoring/oversight of supplier compliance
- Our organization conducts periodic supplier audits to ensure compliance
- Our suppliers are segmented into a number of tiers for the purpose of monitoring and auditing
- Suppliers are encouraged or required to obtain a third-party certification for ethics and compliance

- Our organization provides suppliers with ethics and compliance training assistance or resources
- Some of our ethics and compliance communication initiatives specifically target our suppliers
- Procurement employees are trained to recognize and deal with red flags related to supply chain compliance oversight

15. What information if any do you consider in your due diligence of suppliers?

- Ownership information
- Information pertaining to use of sub-contractors
- Policy documentation
- Training information
- Ethical/compliance track record and practices
- Human rights and labor conditions
- Environmental performance
- Social/community performance

16. Does your organization conduct business in countries known for being at a moderate to high risk for corruption? (Please refer to the [Transparency International Corruption Perception Index](#) for clarification).

- Yes
- No

Skip logic: if B, go to Subpart 7, q1

17. How would you rate the level of oversight of your organization's business activities in countries with medium to high risk for corruption with regards to compliance with applicable anti-corruption and anti-bribery laws?

- High
- Above average
- Average (neither high nor low)
- Below average
- Low

18. How would you rate the level of oversight of your intermediaries such as agents or consultants operating in countries with moderate to high corruption?

- High
- Above average
- Average (neither high nor low)
- Below average
- Low
- Not applicable (our organization doesn't use intermediaries)

19. Which mechanisms does your organization use to ensure compliance with ethical and legal standards related to bribery and corruption?

- Our organization maintains clear anti-bribery standards and those standards are consistently communicated to relevant employees
- Relevant employees are trained to recognize and deal with red flags related to agent/intermediary compliance, including bribery and corruption red flags
- Our organization maintains a number of robust internal controls designed to prevent and detect bribery and corruption
- Our organization conducts periodic risk assessment for bribery and corruption risks
- Our organization conducts periodic evaluation and benchmarking of our anticorruption program/initiatives
- Our organization doesn't allow 'facilitation payments' as a matter of policy
- Our organization's Code of Conduct is applicable to intermediaries such as agents and consultants
- Our organization requires intermediary acknowledgement and compliance with the Code as a condition of doing business with our organization
- Agency or distribution agreements, or intermediary contracts include explicit provisions regarding compliance, including specific provisions regarding compliance with applicable bribery and corruption laws
- Our organization's hotline and some other reporting mechanisms are available to use for agents/intermediaries and their personnel
- Our organization encourages or requires intermediary organizations to maintain a reporting hotline or other reporting mechanism.
- Our organization conducts due diligence when selecting an intermediary, including corruption-related due diligence
- Our organization conducts ongoing monitoring/oversight of intermediary compliance, including compliance with bribery and corruption laws and policies
- Our organization conducts periodic intermediary audits to ensure compliance, including compliance with bribery and corruption laws and policies
- Our intermediaries are segmented into a number of tiers for the purpose of monitoring and auditing
- Intermediaries are encouraged or required to obtain a third-party certification or assurance for ethics and compliance, such as anticorruption certification
- Our organization provides intermediaries with ethics and compliance training or training assistance/resources
- Some of our ethics and compliance communication initiatives specifically target our intermediaries

Subpart 7. Enforcement and Response

1. Does your organization have a written misconduct investigation process?
 - A. Yes
 - B. No

2. Please select the following that apply to your organization's process for the management of misconduct investigations:
 - We forward all reports directly to field (or appropriate HR manager) and follow up as needed
 - Reports are reviewed and prioritized by a senior corporate officer or committee based on the nature and severity of the allegation
 - We use a cross-departmental approach by senior level managers of various disciplines in order to ensure checks and balances are met
 - We keep the Board of Directors and/or Audit Committee updated on the case status

3. Please select the following that apply to how your organization prioritizes reports and/or escalated issues:
 - We prioritize reports based on the type of allegation received (e.g. financial irregularities or insider trading are of higher priority than minor policy violations)
 - We prioritize based on the role of the reported party within the organization and/or the potential severity (monetary value) of the incident
 - We consistently re-prioritize during the course of each investigation and change case ownership as warranted by the investigation
 - We hire outside investigators (or SMEs) for all high priority and/or escalated reports

4. Please indicate how your organization tracks misconduct reports received through various channels?
 - A. Compliance and Ethics function routinely tracks reports and related cases regardless of how they were received
 - B. Different functions or business units track different reports and related cases but this information is shared and coordinated
 - C. Different functions or business units track different reports and related cases but this information is neither shared nor coordinated
 - D. Compliance and Ethics function routinely tracks reports received through the hotline or similar channels, but open door reports (such as those reported directly to a supervisor) are not normally tracked

5. Select the following that apply to how your organization tracks and reports the management of cases:
 - Maintains an Excel spreadsheet or similar tool
 - Logs investigation notes
 - System allows for secure access by user
 - System allows for multiple case ownership

- System allows for files to be attached to individual cases
- System allows due dates to be set and sends reminders to applicable parties
- System allows for internal collaboration
- System allows for collaboration with external parties
- System provides audit trail of all case activity and access
- System warehouses other related data
- System allows for trend identification and analysis

6. Does your organization track the person-hours used to investigate reports of unethical and illegal activities?

- A. Yes
- B. No

7. Does your organization track the costs associated with outside experts (investigators, attorneys, accountants, etc.) investigating reports of unethical and illegal activities?

- A. Yes
- B. No

8. Does your organization maintain a non-retaliation policy?

- A. Yes
- B. No

Skip logic: if B, go to q11

9. Please indicate which of the following aspects apply to the organization's non-retaliation policy:

- Specifies that reports must be made in good faith
- Communicated in our Business Code of Conduct
- Communicated as a stand-alone policy
- Included in misconduct reporting messaging (e.g. in hotline info)
- Management is required to receive non-retaliation training
- Specifies that retaliation is against the law
- Non-retaliation statement is present in executive communications

10. Please indicate your level of agreement with this statement: ***“Our organization’s non-retaliation policy is clearly communicated to all employees”***:

- A. Strongly agree
- B. Agree
- C. Neutral
- D. Disagree
- E. Strongly disagree

11. Does your organization maintain a written disciplinary policy?

- A. Yes

B. No

Skip logic: if B, go to q14

12. Please indicate which of the following aspects apply to the organization's disciplinary policy:

- States progressive discipline
- Outlines disciplinary process
- Lists or describes the types of disciplinary action that can be taken, including termination
- Communicated in the Code
- Communicated as a stand-alone policy
- Provides for disciplinary action against a manager or supervisor who knew, or should have known, about employee misconduct

13. Please indicate your level of agreement with the following statement:

"The policy and procedures on disciplinary action (for engaging in misconduct) is consistently applied/enforced throughout the organization":

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

14. Which mechanisms (if any) does your organization utilize to incentivize employees who engage in ethical conduct or for active support of compliance initiatives/compliance performance metrics (select all that apply)?

- Formal evaluation of ethical conduct as a part of annual performance reviews
- Formal evaluation of ethical business conduct as a part of promotion decisions
- Continued employment
- Awards and recognitions showcasing ethical business conduct

15. Does your organization routinely conduct exit interviews as employees leave?

- A. Yes
- B. No

Skip logic: if B, go to Part VI, q1

16. Do exit interviews include questions that are designed to assess whether the departing employee was aware or concerned about potentially unethical events that were taking place at your organization?

- A. Yes

B. No

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Part VI. Corporate Citizenship, Sustainability and Responsibility

1. Does your organization publish a Corporate Citizenship/Responsibility/Sustainability Report (“Report”) on its performance?
 - A. No
 - B. Not yet, but we are currently working on our first report
 - C. Yes, but the Report is not made publicly available
 - D. Yes, and the Report is available on our website

Skip logic: if A, go to q7

2. How often is your CSR report published?
 - A. Every four to five years, or less often
 - B. Every two to three years
 - C. Annually

3. When was the first Report published?
 - A. Currently publishing
 - B. 2011
 - C. 2010
 - D. 2009
 - E. 2008
 - F. 2007
 - G. 2006
 - H. 2005
 - I. 2004
 - J. 2003
 - K. 2002
 - L. 2001
 - M. Before 2001

4. Was your most recent Report audited?
 - A. We do not audit our Report
 - B. We self-audit
 - C. Our Report is audited independently

5. Does your organization use GRI framework for sustainability/citizenship reporting?
 - A. Yes
 - B. No

6. Does your organization benchmark its Report against GRI framework?
 - A. Yes, and the benchmarking scorecard is publicly available

- B. Yes, but benchmarking scorecard is not publicly available
 C. No

7. Select which initiatives your organization is **currently** participating in or a member of:

- UN Global Compact
 World Economic Forum's Partnering Against Corruption Initiative (PACI)
 World Economic Forum's Climate Change Initiative
 World Economic Forum's Corporate Global Citizenship Initiative
 World Business Council for Sustainable Development
 The Copenhagen Communiqué
 Transparency International
 GRI Organizational Stakeholder Program
 Global Roundtable on Climate Change
 Carbon Disclosure Project
 U.S. Environmental Protection Agency programs (e.g. Climate Leaders, Green Power partnership, National Partnership for Environmental Priorities)
 Other (e.g. industry specific, local or national non-U.S. initiatives): *list here*
 [200 characters]

8. Has your organization been a **founding member** of any significant industry, national, or international initiative related to corporate citizenship, responsibility and sustainability?

- A. Yes (please specify) _____
 B. No
 C. Not sure

9. Please indicate whether your organization's workforce-related programs/initiatives include any of the following:

- Diversity program
 Affirmative action plan
 Workforce training, skills and leadership development programs
 Mentoring programs
 Tuition reimbursement (other than career training)
 Employee assistance programs
 Contributory pension scheme (such as 401k)
 Choice of health, vision and dental insurance plans
 Childcare facilities
 Gym facilities
 Wellness programs
 Preventative healthcare programs
 Flex scheduling
 Telecommuting options
 Public transportation subsidy

- Carpooling support programs
- Sabbatical
- Matching gift program
- Paid time off for employee volunteers
- Employee recognition program

10. How would you rate your organization's workplace injury rates compared to your industry rates?

- A. Below average (less injuries than normal)
- B. Average
- C. Above average (more injuries than normal)

11. How would you describe the difference between the benefits provided for full-time employees and those provided to part-time or temporary employees?

- A. There is a significant difference between the benefits provided to these groups; our part-time or temporary employees receive substantially fewer benefits than our full-time employees
- B. There is a difference, but it's neither significant nor insignificant
- C. Insignificant difference; our part-time or temporary employees receive substantially the same or similar benefits as our full-time employees
- D. Not meaningful; we don't have part-time or temporary employees

12. How would you rate your organization's overall workforce impact/workforce-related programs versus national and industry best practices?

- A. Outstanding—among the top performers
- B. Good, but some areas need relatively minor improvement
- C. Average—neither good nor bad, a few improvements are needed
- D. Below average—quite a few gaps
- E. Well below average—my organization does not currently have any workforce-related programs

13. Please indicate whether your organization's environmental programs/initiatives include any of the following:

- Specific and measureable environmental performance goals
- Carbon footprint accounting and disclosure
- Use of energy efficient/green certified buildings (e.g. "Energy Star" certified)
- Use of renewable energy sources
- Waste management/recycling
- Water management
- Biodiversity
- Conservation
- Sustainability/environmental considerations in product development
- Sustainability/environmental consideration in supplier selection/product sourcing

- Procurement, development and/or marketing of energy efficient/green certified products (e.g. “Energy Star” certified)

14. Indicate which category your organization’s most recent Carbon Disclosure Leadership Index falls within:

- A. 90 or above
- B. 80-89
- C. 70-79
- D. 60-69
- E. 50-59
- F. 30-49
- G. Less than 30
- H. Not sure
- I. My organization is not currently rated by the Carbon Disclosure Project

15. How would you rate your organization’s overall environmental performance and related programs versus national and industry best practices?

- A. Outstanding—among the top performers
- B. Good, but some areas in need relatively minor improvement
- C. Average—neither good nor bad; a few significant improvements are needed
- D. Below average—quite a few serious gaps
- E. Well below average—we do not have any environmental performance or related programs

16. Indicate upon which subject matters your organization’s key philanthropic programs/initiatives make a direct impact:

- Arts
- Education/literacy
- Science
- Civil liberties
- Crime reduction
- Public safety
- Health
- Living standards
- Environment
- Minorities
- Children/Schools
- Poor/Underprivileged
- Our philanthropic giving does not currently focus on direct impact programs

17. How active is your organization in public policy development/lobbying?

- A. Very active
- B. Active
- C. Neither active or inactive

- D. Inactive
- E. Very inactive

18. Does your organization have a charitable foundation?

- A. Yes
- B. No

19. Please provide your organization's **total** annual philanthropic contributions made both to the foundation and directly (including cash or in-kind employee donations and volunteer time) as a percentage of **net** revenue (EBITDA), averaged over last three year period:

- A. Over 10 percent
- B. 5.0 to 9.9 percent
- C. 3.0 to 4.9 percent
- D. 1.0 to 2.9 percent
- E. Less than 1 percent

20. Who owns the responsibility of CSR initiatives and programs within your organization?

- A. Senior Executive (C-suite)
- B. Senior Management (SVP, VP, Director)
- C. Manager
- D. Other: _____

21. Does your organization have a Chief Sustainability Officer?

- A. Yes
- B. No

Part VII. Additional Commentary

I wish to provide the following additional information:

[Open-ended, 1000 characters]

Thank You for Completing the Survey
