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World's Most Ethical Companies as Benchmark Data Set

This Report contains data points from Ethisphere's 2018 World's Most Ethical Companies ("WMEC") data set. This data set provides insights into the programs and practices of leading companies from around the world. The dataset referenced through the Report ("WME Honorees") is comprised of 135 companies.

The Benchmark data set is presented to provide a comparative view into the practices of leading companies. For the full list of WMEC companies visit: http://worldsmostethicalcompanies.ethisphere.com/honorees



Summary Findings

Key Finding

Almost all WME Honorees require conflict of interest certifications from at least some of their employee base. Approximately two thirds (63 percent) of WME Honorees require conflict of interest certifications of all employees, with a little under one-third (29 percent) requiring it only of select employees. A significant majority (81 percent) are require conflict of interest certifications at least annually.

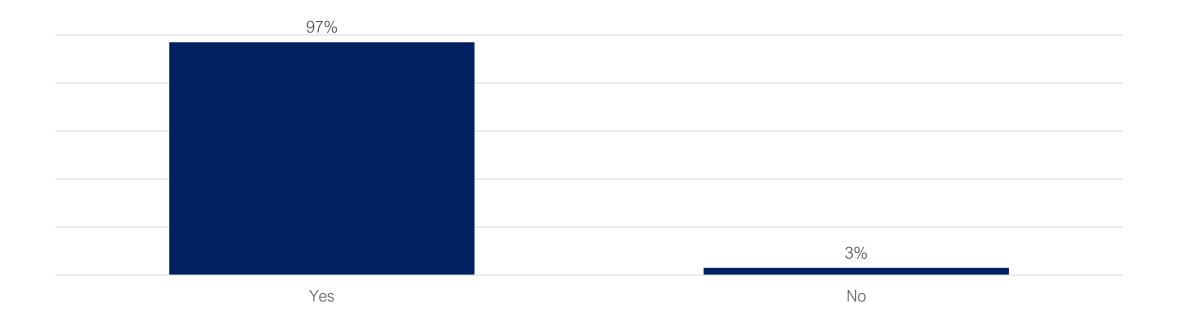


Risk Assessment, Monitoring & Auditing

Review Third Party Diligence Processes

EQ 4F.18 Does your company maintain a procurement policy that addresses key aspects of third party selection, management, and compliance oversight?





Risk Assessment, Monitoring & Auditing

Consider Tracking Entertainment Received by Employees

EQ 4F.20 Does your company track any entertainment and/or gifts given or received by your company's employees?

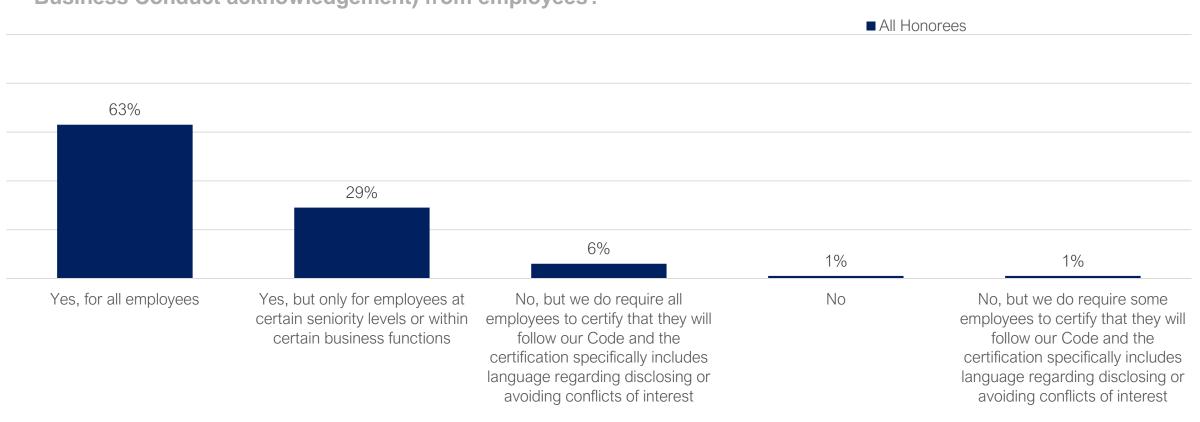


Yes, our company tracks gifts and/or entertainment

No, our company does not track gifts or entertainment

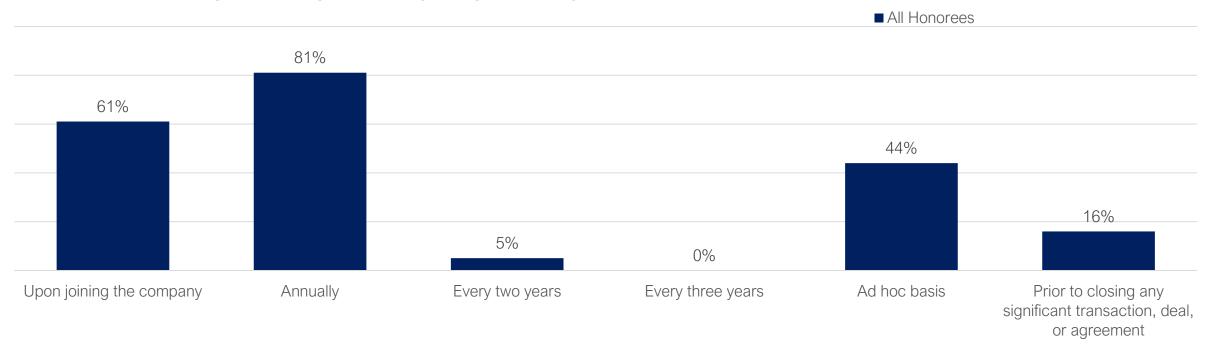
Risk Assessment, Monitoring & Auditing COI Disclosure

EQ 4B.4 Does your company require conflict of interest certifications and/or disclosures (separate from a Code of Business Conduct acknowledgement) from employees?



Risk Assessment, Monitoring & Auditing COI Disclosure

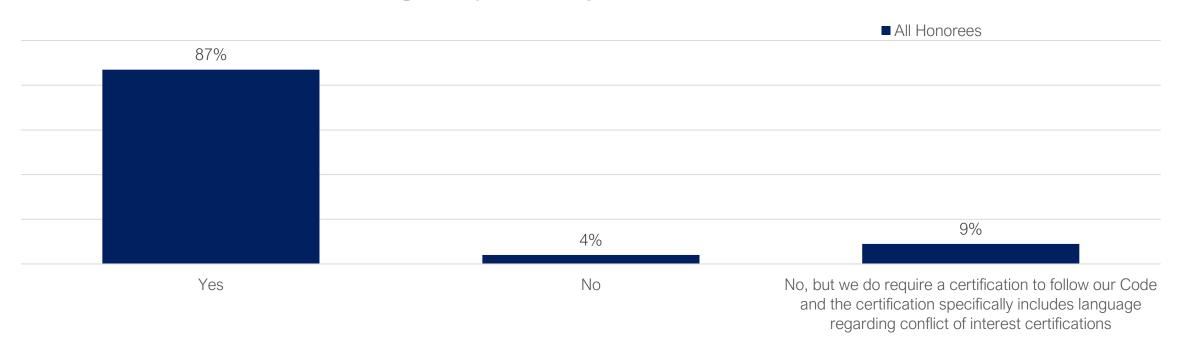
EQ 4B.5 How frequently does your company require the conflicts of interest acknowledgment and/or disclosure discussed in the previous question? (Multiple select)



Corporate Governance

COI Disclosure

EQ3.6 Does your company require conflict of interest certifications and/or disclosures (separate from a Code of Business Conduct acknowledgement) from independent directors?



Corporate Governance

Board Training

EQ 3.25. On which topics do directors on your Board receive education or training (separate from the Code)?

Topics	As part of on- boarding or orientation	Education or training on topic included as part of compliance program updates	As part of documented, periodic training initiatives
Anti-trust law	61%	64%	37%
Anti-bribery	59%	79%	44%
Policies regarding confidential information	68%	57%	38%
Policies regarding conflicts of interest	81%	65%	39%
Executive Compensation Trends and Developments	39%	51%	53%
Fiduciary duty	82%	36%	42%
Policies regarding gifts and entertainment	67%	71%	34%
Regulations or trends regarding preventing human trafficking	37%	65%	39%
Risks or regulations regarding information security/cyber security	44%	76%	57%
Policies regarding insider trading	84%	62%	40%
Privacy regulations Trends and risks regarding the need to protect those who report suspected misconduct	45% 50%		
Trends and risks regarding social media	31%		
Updates on industry or economic trends or risks	46%	62%	57%
Updates on significant regulatory changes	35%	71%	56%





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