

2018 WME Focused Facts: Chief Compliance Officer Reporting Lines

Prepared April 12, 2018

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- WMEC Benchmark Data Set
- WMEC Ethics Quotient™ Survey Results
- Culture Survey Results

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.

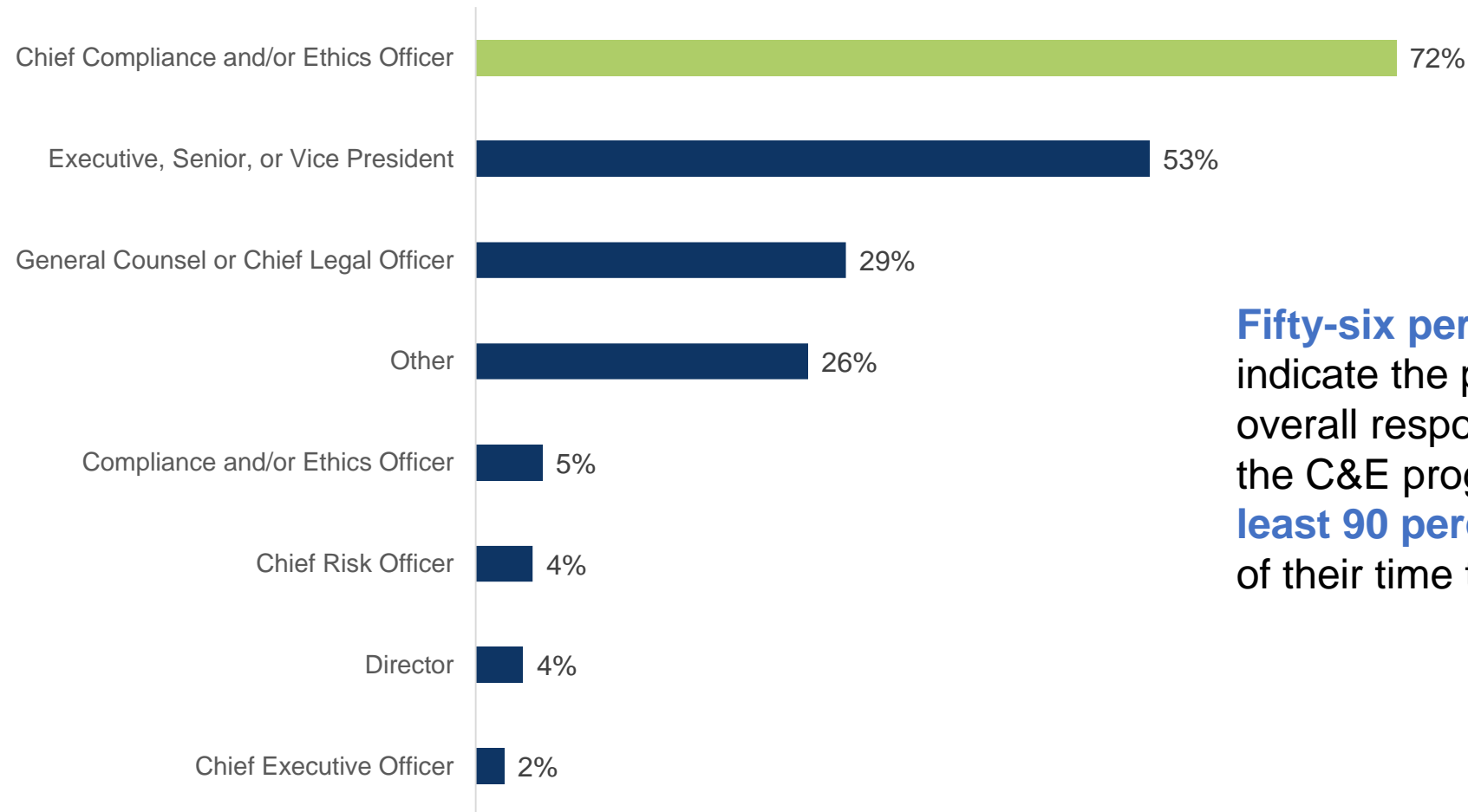
The Benchmark data set is presented to provide a comparative view into the practices of leading companies. For the full list of WMEC companies visit: <http://worldsmostethicalcompanies.ethisphere.com/honorees>

A close-up, sepia-toned photograph of a hand holding a pen, pointing at a financial chart. The chart features various data series, including a jagged line graph and a dotted line. The text 'E&C Reporting Structure' is overlaid in the center. The background is blurred, showing a grid pattern.

E&C Reporting Structure

Job Titles of E&C Program Owner

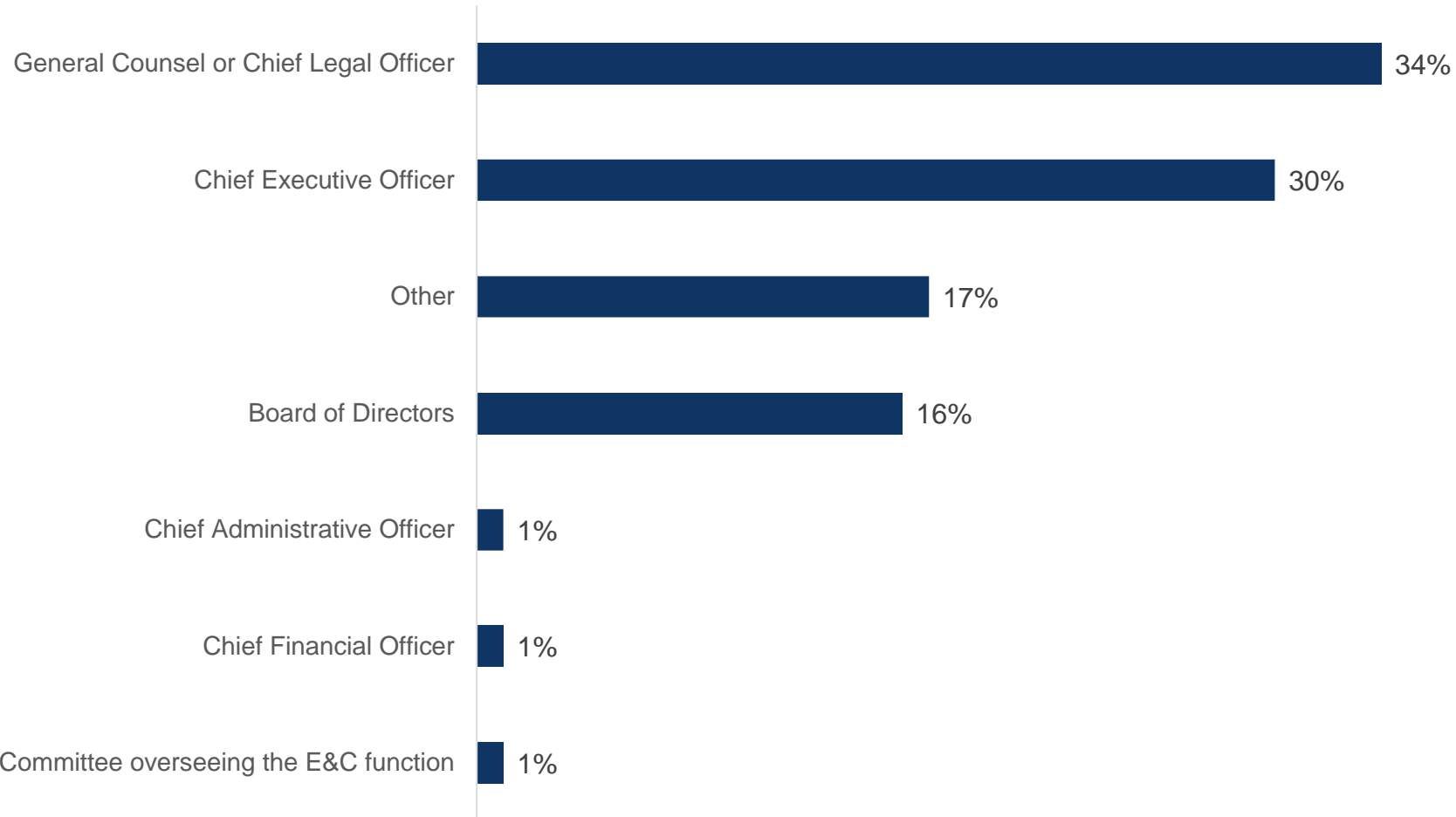
4A.1 Specify all job titles held by the person assigned overall ownership of the compliance and ethics program.



Fifty-six percent of honorees indicate the person assigned overall responsibility for the C&E program dedicates **at least 90 percent** of their time to that role

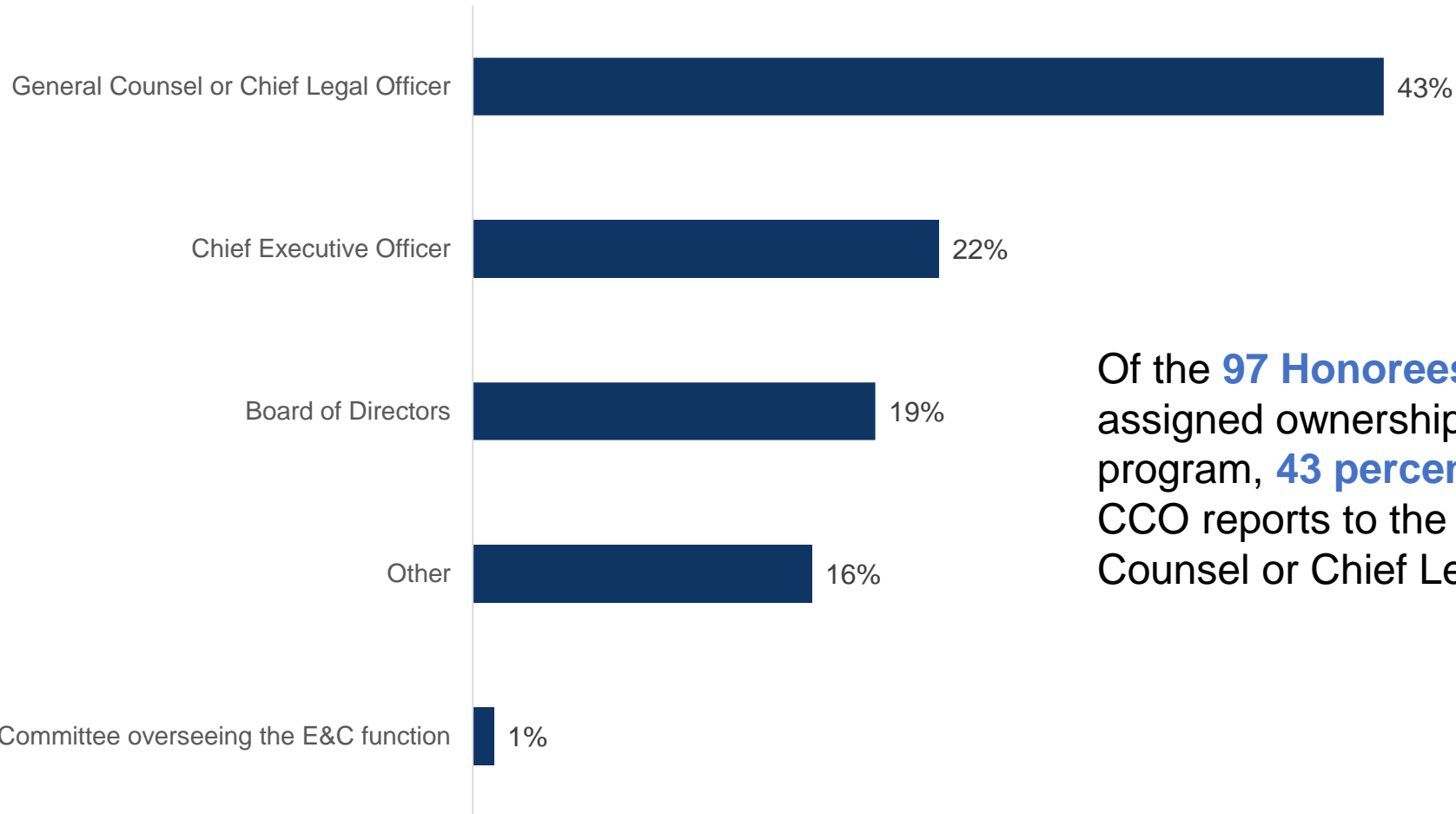
Reporting Structure

4A.6 To whom does the person with overall responsibility for the compliance and ethics program administratively or managerially report?



Reporting Structure

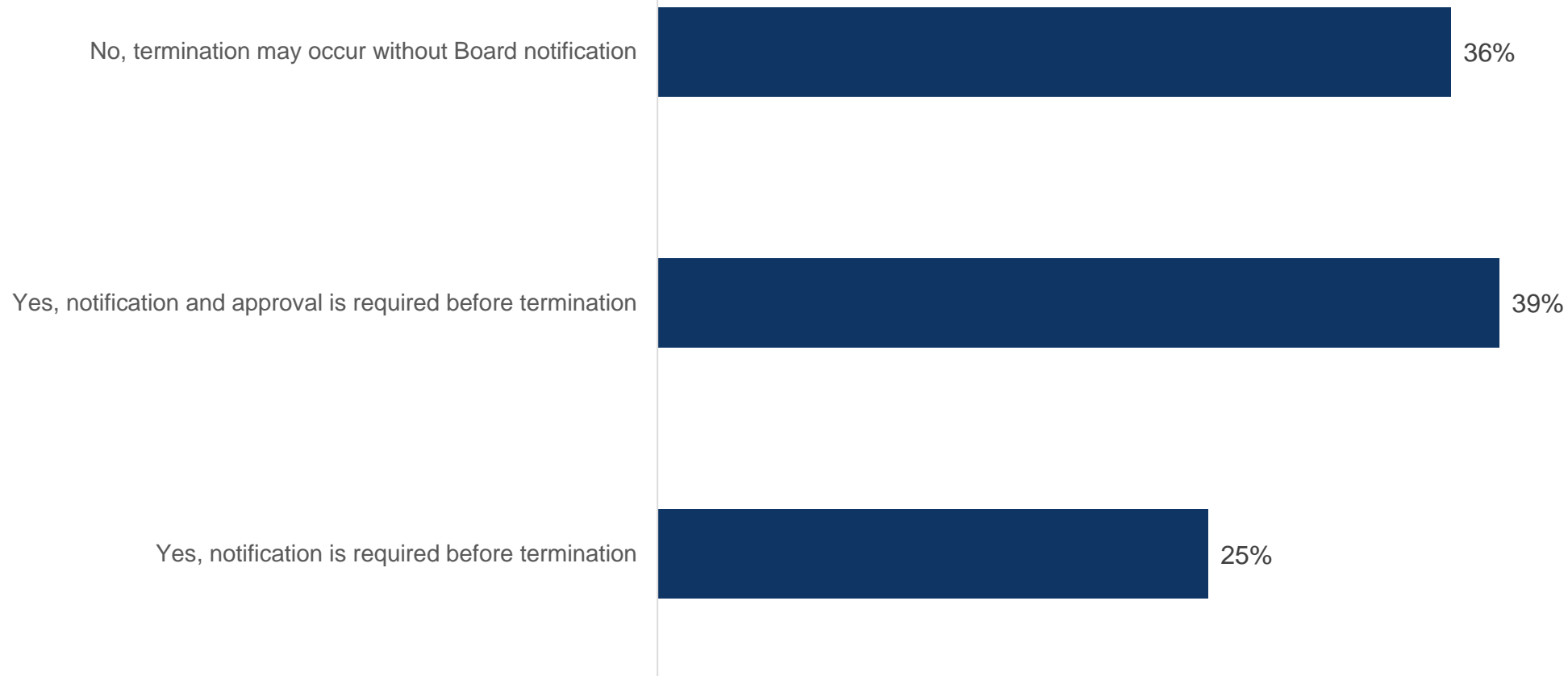
4A.6 To whom does the person with overall responsibility for the compliance and ethics program administratively or managerially report? [CCO Breakout](#)



Of the **97 Honorees** with a CCO assigned ownership of the E&C program, **43 percent** indicate the CCO reports to the General Counsel or Chief Legal Officer.

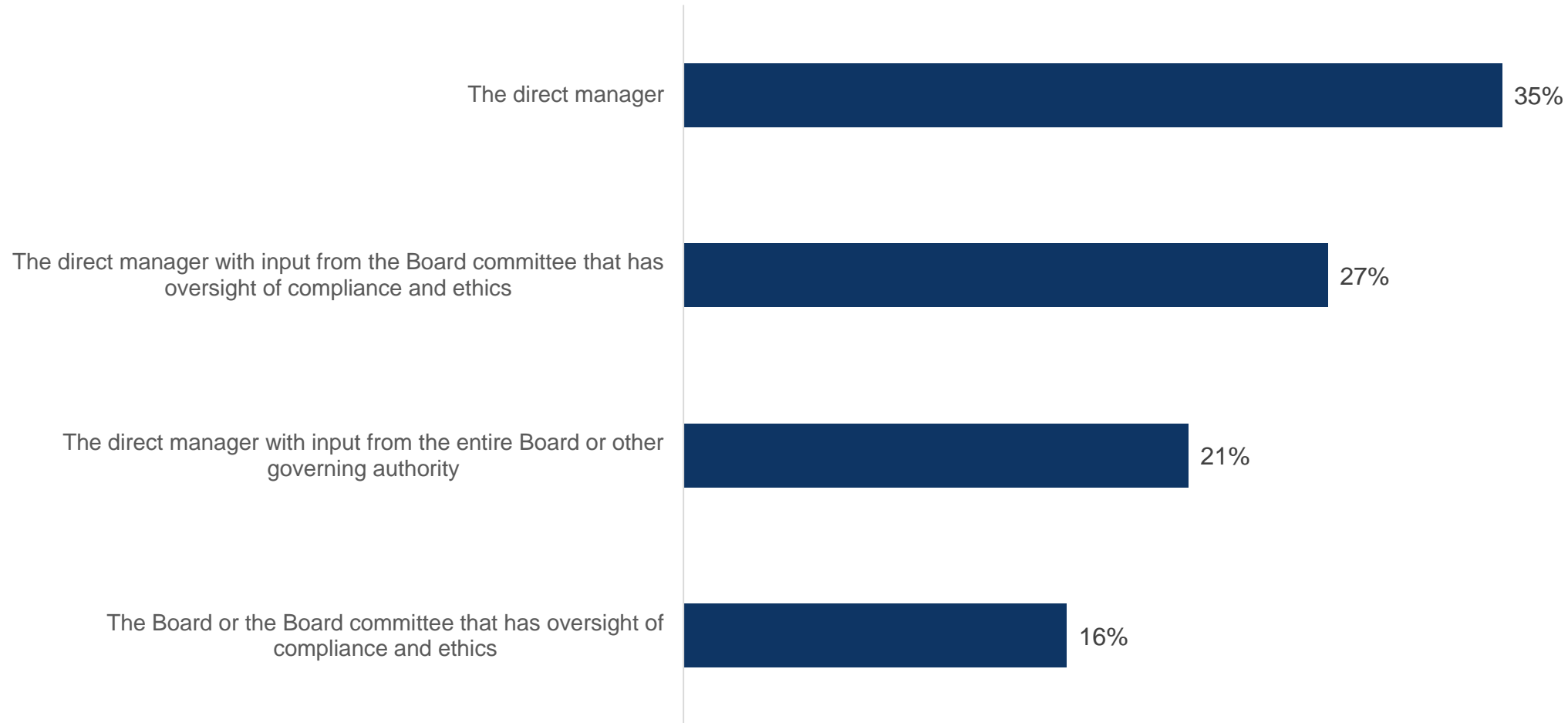
Reporting Structure

4A.7 Is there a documented policy or process requiring that the Board, a committee of the Board, or other governing authority be notified or approve before the person who has been assigned overall responsibility for the compliance and ethics program is terminated?



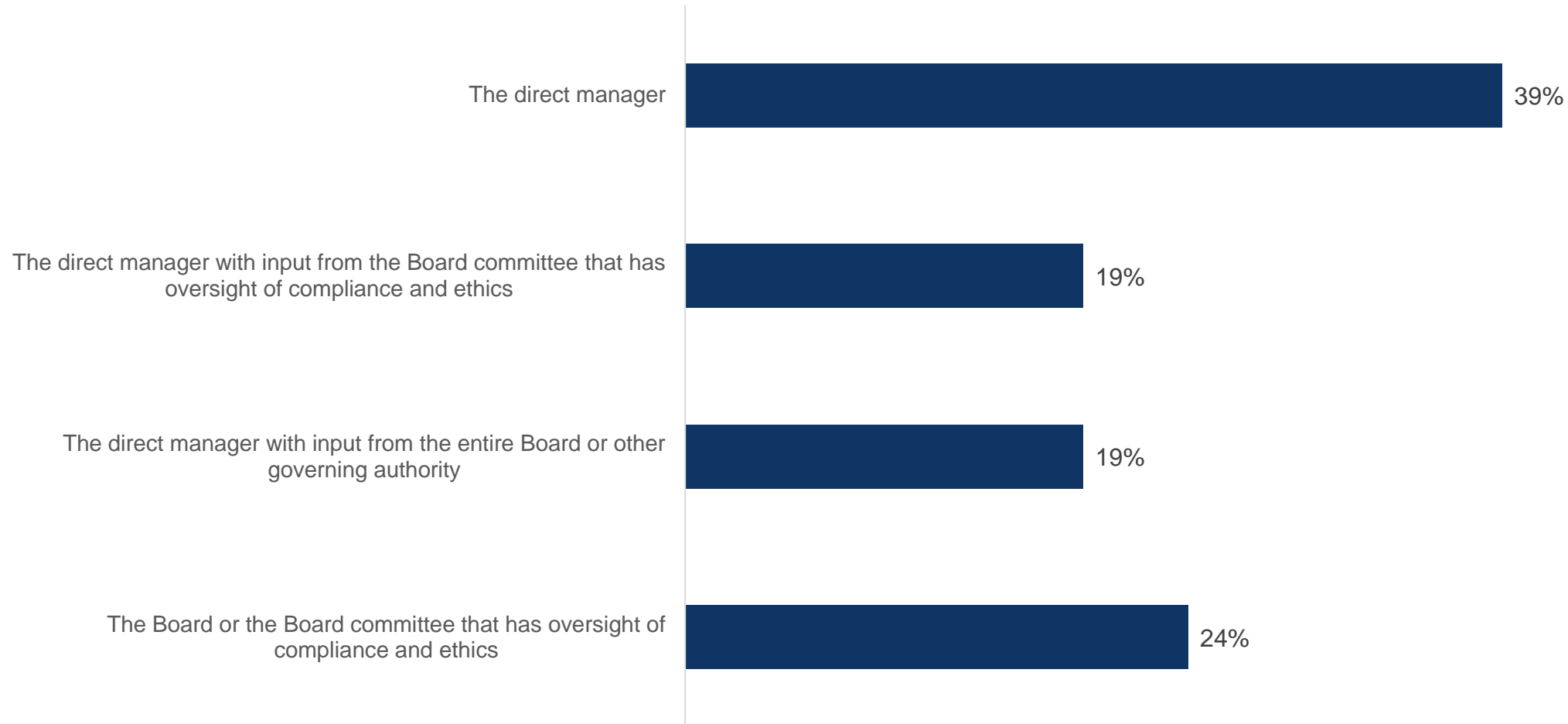
Performance Evaluations

4A.8 Who conducts the annual performance review of the person assigned overall responsibility for the compliance and ethics program?



Compensation Decision

4A.9 Who makes compensation decisions for the person assigned overall responsibility for the compliance and ethics program?



Thank You



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