



Debrief on 2018 WME Director Code Training Results

Prepared April 10, 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://worldsmoethicalcompanies.ethisphere.com/honorees>

A hand holding a white pen points to a financial chart on a tablet. The chart features a grid with a red line graph and a blue line graph. The background is a blurred office setting with a window grid. The text "Director Code Training" is overlaid in the center.

Director Code Training

19,490
19,460
19,400

GFV 13

20

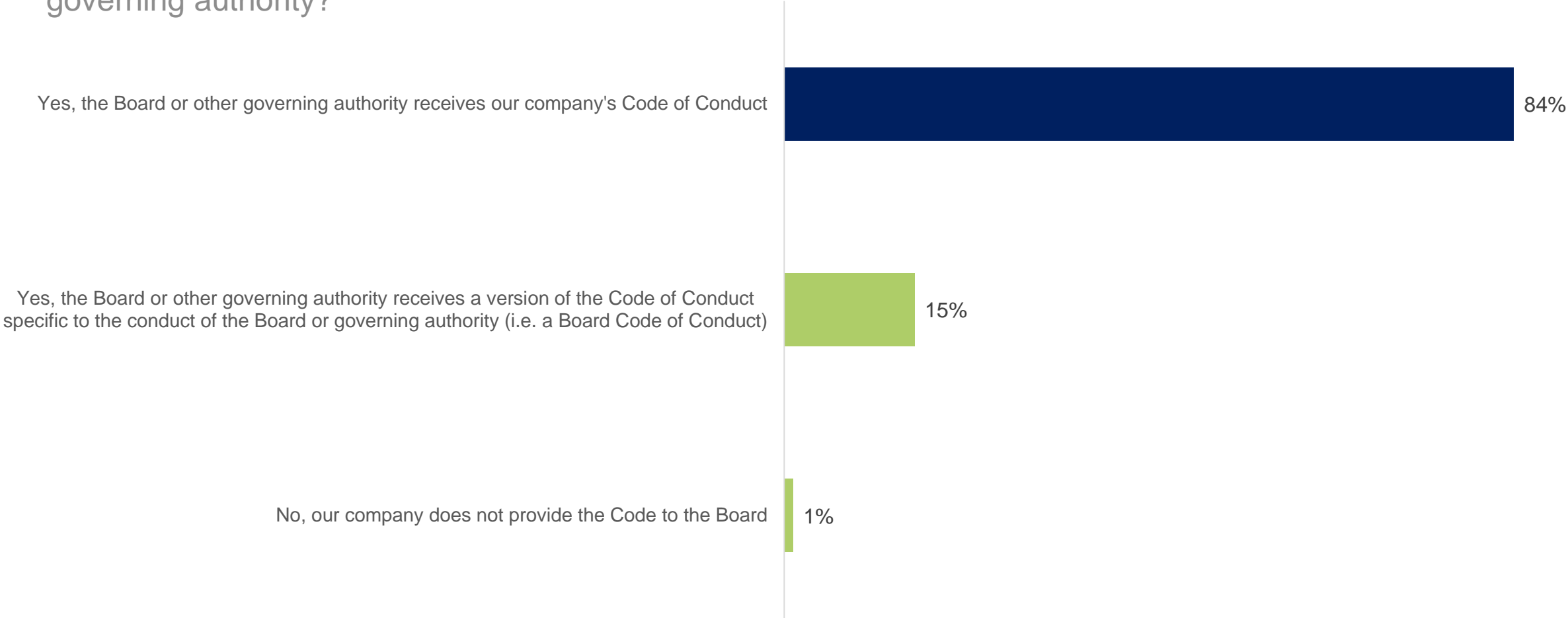
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22

Value

Board Code of Conduct

3.23 Does your company provide a version of its Code of Conduct to the Board or other governing authority?



Director Code Training

3.24 In the past two years, has your company's Board or other governing authority received formal training on either the Company's Code of Conduct or Board-specific version of the Code?

Yes, but Directors receive a Board-specific version of Code of Conduct training

49%

Yes, Directors receive the same Code of Conduct training as employees

29%

No, Directors do not receive Code of Conduct training

22%

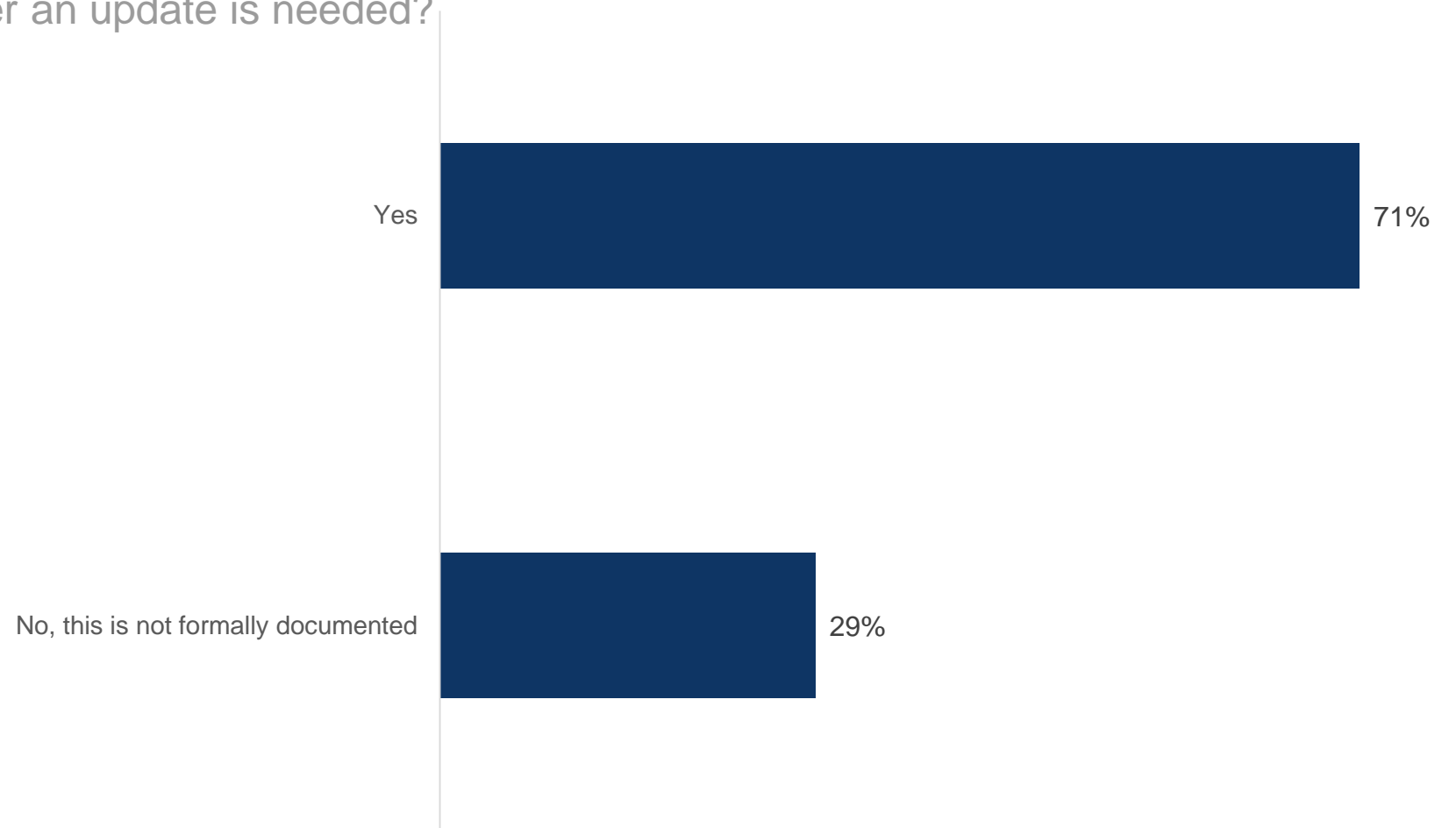
Director Training

3.25 Indicate which topics directors on your company's Board receive education or training on (separate from Code training) and when they receive said training or education.

All Honorees Data	During On-Boarding	During Program Updates	During Periodic Training
Anti-trust and competition law	35%	40%	20%
Anti-bribery or anti-corruption law	47%	60%	34%
Protecting confidential information	58%	42%	30%
Company's policies/procedures regarding conflicts of interest	68%	54%	30%
Executive Compensation Trends and Developments	29%	39%	43%
Fiduciary duty	66%	25%	37%
Gifts and entertainment	53%	52%	25%
Human trafficking, slavery, indentured servitude or forced labor	16%	26%	16%
Information security/cyber security	36%	68%	50%
Insider trading	62%	46%	38%
Privacy regulations	34%	53%	28%
Need to protect those who report suspected misconduct	39%	66%	34%
Trends and risks regarding social media	20%	30%	29%
Updates on industry or economic trends or risks	41%	55%	59%
Updates on significant regulatory changes	32%	66%	49%
Other training topic(s)	18%	22%	25%

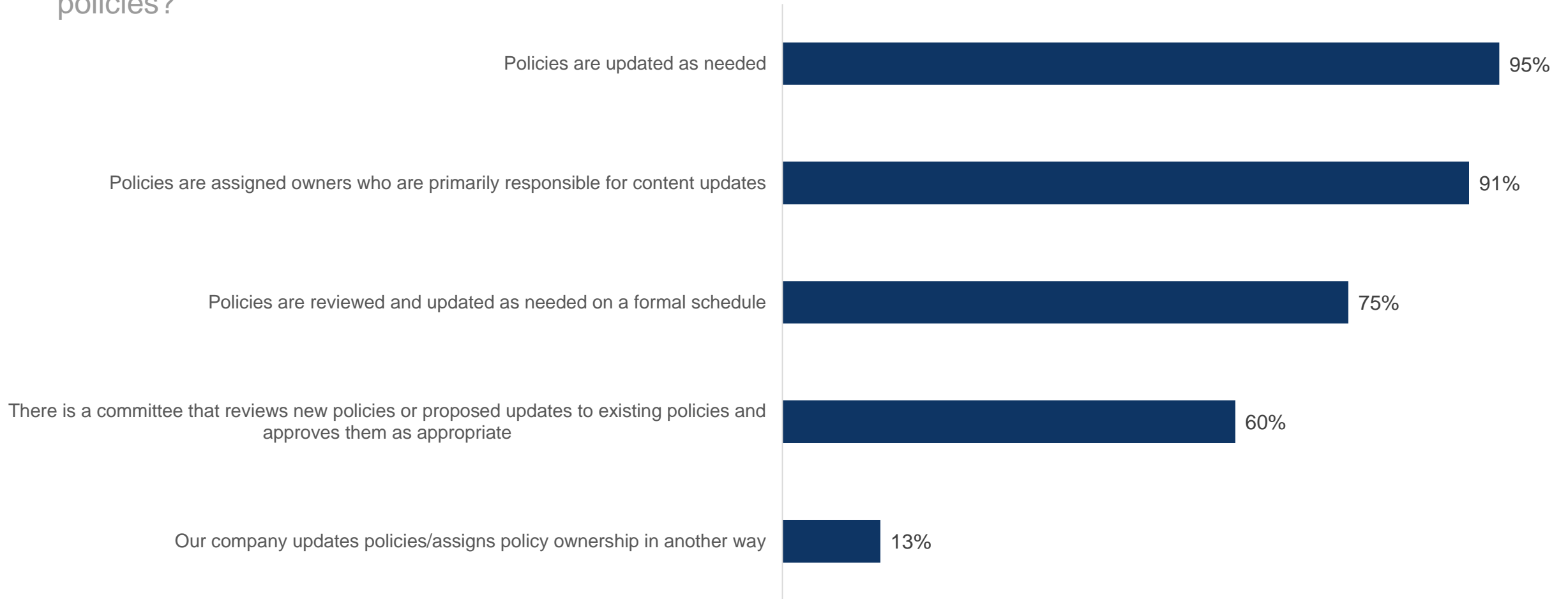
Code Updates

4C.2 Is there a written requirement documenting the frequency with which the Code is reviewed to determine whether an update is needed?

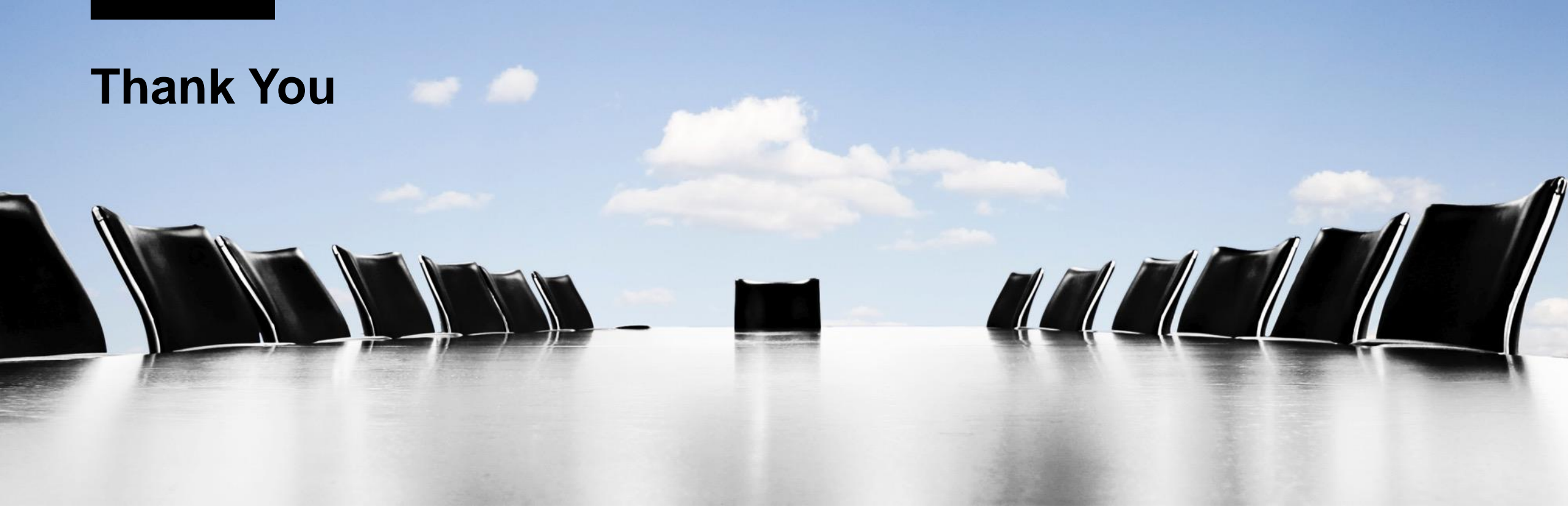


Policy Updates

4C.7 How does your company update and assign ownership of its ethics and compliance policies?



Thank You



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