

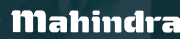
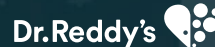
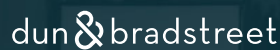


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2019 BELA South Asia Best Practices in Prevention of Sexual Harassment (PoSH) Report

BELA South Asia Founding Members

The BELA South Asia Chapter includes a community of select multinational companies. Founding Members collaborate to shape the strategic and tactical direction of the chapter while playing a leadership role in inspiring best practices in ethics, integrity, and anti-corruption efforts across India and South Asia.



BELA South Asia Integrity Partners

Integrity Partners are a consortium of leading companies that have come together to collectively raise the standards and practices for ethical and compliant corporate behavior in the region. Integrity Partners are accepted on an invitation-only basis.



Arthur J. Gallagher & Co.



Learn More:

bela.ethisphere.com/south-asia

Interested in joining the BELA South Asia Chapter?
Contact: jonathan.whitacre@ethisphere.com



Confederation of Indian Industry

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Thanks to the BELA South Asia Working Committee



Aparna Kirpal,
Country Compliance Manager,
Johnson Controls



Shukla Wassen,
Executive Director, Legal and Corporate Affairs, South Asia,
Hindustan Coca-Cola Beverages Pvt Ltd



Pankaj Dahibhate,
Head of Compliance,
Cummins India



Vidya Radhakrishna,
Practice Lead, HR,
Infosys



Sujata Nabar,
General Manager,
Diageo India



Vasudha Sharma,
Legal Counsel,
Accenture

2019 BELA South Asia Best Practices in Prevention of Sexual Harassment (PoSH) Report

Dear readers,

We are delighted to release our first Business Ethics Leadership Alliance's (BELA) Prevention of Sexual Harassment (PoSH) Survey and Report, which was launched under the direction of our BELA South Asia working committee comprised of leaders from **Infosys, Diageo India, Cummins, Hindustan Coca-Cola Beverages Pvt Ltd** and **Johnson Controls**.



Since PoSH was legislated, companies across India have been working to meet its terms and provide a safe environment for their employees. Accelerating this is the fact that more women have entered the workforce, taking on leadership positions from the boardroom to offices and to plants in rural areas of India—which all means that the workplace dynamic has evolved.

The survey, which included participants from beyond the BELA South Asia community and touched a variety of industries, was designed to capture leading practices while measuring how companies—both those based in India and multinationals operating in the region—are responding to PoSH compliance, fair employment practices and other forms of harassment. The survey data in the report is the first of its kind in India. It serves as a testament to the work of our leaders in the BELA South Asia community, who are willing to take the lead to gather the information needed to guide the overall business ecosystem in a positive way.

What is important to note is that these issues are not going away. While #MeToo may no longer be the topic of daily headlines, its impact is ubiquitous and powerful. Sexual harassment has become a human rights issue, and considering that the consumer and investment bases who drive our businesses are decidedly human, figuring out best practices for dealing with it is a priority. That is why we are so delighted to share the relevant data derived from the BELA Prevention of Sexual Harassment (PoSH) Survey and Report.

In the following pages of this report, you will glean data-driven insights into how companies are responding to PoSH and how companies like TATA Steel, DELL and others are working to make a difference in the communities where they serve and operate across India.

The stakes have never been higher when it comes to workplace respect and conduct, and we hope that the data from our survey can help shed light on this developing area.



Erica Salmon Byrne
Executive Vice President and Chair,
Business Ethics Leadership Alliance



The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act provides protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto. Whereas sexual harassment in violation of the fundamental rights of a woman under articles 14 and 15 of the Constitution of India and her right to life and to live with dignity under article 21 of the Constitution and right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment; And whereas the protection against sexual harassment and the right to work with dignity are universally recognised human rights by international conventions and instruments such as Convention on the Elimination of all forms of Discrimination against Women, which has been ratified on the 25th June 1993 by the Government of India; And whereas giving effect to the said Convention for protection of women against sexual harassment at workplace.

**Source – The Government of India,
Ministry of Law and Justice**

Fair Employment Policy

Article 14 of the Constitution of India reads as under: “The State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India.”

Indian constitution encapsulates social safeguard measures for all citizens of India in Article 15 and Article 16. Article 15 mandates prohibition of discrimination on grounds of religion, race, caste, sex or place of birth.

Article 16 mandates equal opportunity in matters of public employment. Article 16(2) further states that no citizen shall on grounds only of religion, race, caste, sex, descent, place of birth, residence or any of them, be ineligible for, or discriminated against in respect of, any employment or office under the State.

Source – Constitution of India

Constitution of the Internal Complaints Committee (ICC) Under the PoSH Act

Every workplace that has a minimum of 10 employees shall mandatorily set up an ICC with women constituting at least half of the ICC's members. The ICC's key mandate is to oversee the implementation of the organization's POSH Law policy by ensuring a work environment free of sexual harassment and providing an effective redressal mechanism for any complaints of sexual harassment against women.

The ICC shall comprise a senior level woman employee as the chairperson or presiding officer, a minimum of two employees committed to uphold women's rights and another member from a NGO or an association dedicated to women's welfare or conversant with issues of sexual harassment. It is pertinent to note that where an employer or organization has multiple locations, with each location having 10 or more personnel, it is mandatory to set up an ICC in each such location.

Source - Madhu Sivaram Muttathil
Senior Corporate Counsel
Avaya India Pvt. Ltd.

Abhijit Gangadhar Poonja
Senior Corporate Counsel
Cisco India

South Asia Ethics Summit Panel Session: POSH, Curtailing Harassment and Progressing the Company's Culture of Respect



MODERATOR

Erica Salmon Byrne, EVP and Chair, **BELA**

SPEAKERS:

Nanjappa B.S., Vice President, Human Resources, **Infosys**

Sheetal Raina, Ethics Advisor, India, **The Boeing Company**

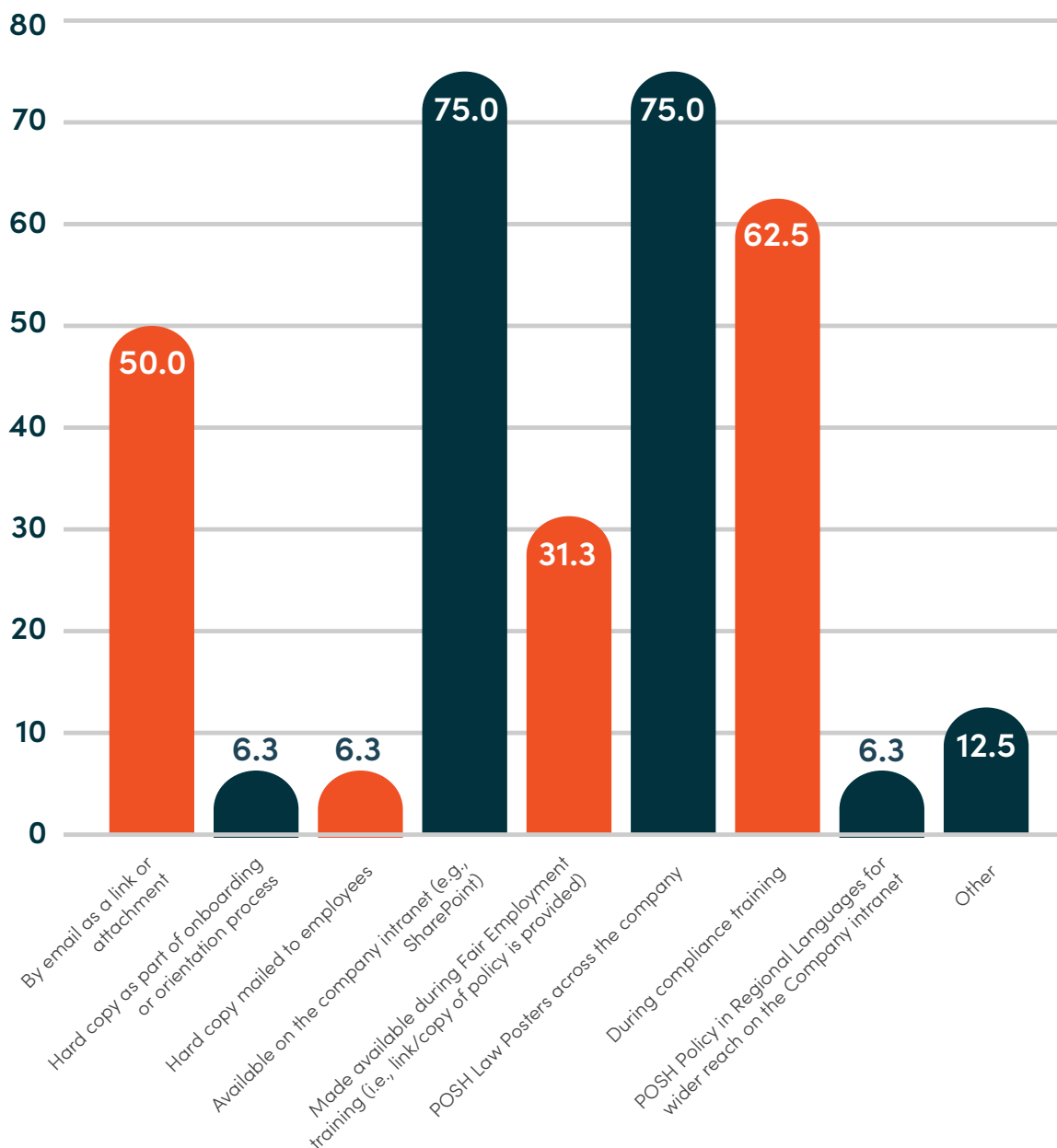
Ritu Jain, Chief Compliance, Office, Asia, **GE**

Shukla Wassan, Executive Director, Legal & Corporate Affairs, South Asia,
Hindustan Coca-Cola Beverages Pvt. Ltd India

To view the session recordings, request guest access to the BELA member hub [here](#)

India's Response: Through narratives, companies in India have found that they are able to reach employees across the board and communicate what a fair and respectful workplace should look like. In our PoSH survey, 75 percent of companies reported that they share anonymized lessons learned from sexual harassment cases with employees and communicate information around PoSH on posters across the company. General Electric, for example, will use actors—who are company employees—to portray a harassment scene in their training initiatives, before asking employees to identify and respond to the issue. Moreover, the data shows that about 55 percent of companies deploy workplace harassment prevention training annually with just 12 percent rolling out training only when needed.

How is your policy on prevention of sexual harassment communicated to employees?



“At Accenture, respect for the individual is a core value and we believe that a respectful workplace allows us to thrive and be our best every day. We have zero tolerance towards sexual harassment, and our efforts go beyond statutory compliance—we continually emphasize the importance of appropriate workplace behavior, and take action when violations occur. We are building a culture of respect, and encourage our people to make their conduct count. We lay great emphasis on education and awareness-building within our large and diverse workforce, with continuous, visible and tailored messaging on acceptable and unacceptable behavior. For example, we have a young workforce, and many of our people are fresh campus hires. For them we conduct ‘campus to corporate’ storytelling sessions which are scenario based and help them understand even subtle forms of harassment. We urge all of our people to ‘say something, when they see something.’”

Rajeev Chopra,
Managing Director – Legal,
Accenture



Driving PoSH Awareness Through Workshops and Training

In the following interview, Archana Sasan, Vice President, DELL, India Legal and Ethics, spoke to Ethisphere about the tech company's compliance journey and why training and awareness are a key component of effective PoSH compliance.

Can you talk more about DELL's PoSH compliance journey?

Sasan: The transition to compliance with the provisions of the Prevention of Sexual Harassment of Women at Workplace (Prevention, Prohibition, Redressal) Act, 2013 (POSH Act) has been smooth at Dell because our existing global harassment policies covered sexual harassment and further we also had in place the Vishaka guidelines in India to deal with instances of harassment. Processes to drive awareness and adherence were already in place. Of course, post the POSH Act we had to somewhat modify India-specific processes and policy.

Does DELL maintain a standalone harassment policy? What areas does it cover and why?

Sasan: Dell maintains a standalone global harassment policy and the policy addresses workplace harassment across a broad range of categories. Essentially this policy covers all forms of actions, conduct or behaviors which create a hostile or offensive work environment or which otherwise undermine an individual's ability to perform at the workplace. The sexual harassment policy is a subset of this. As stated above, Dell India has a standalone policy on sexual harassment as mandated by the POSH Act.

According to our BELA SA PoSH data, 62 percent of companies drive posh awareness through workshops while 75 percent use specific awareness initiatives. Can you tell us which has been effective for DELL in driving awareness of PoSH policies?

Sasan: At Dell both workshops/trainings and awareness initiatives have been helpful in driving POSH awareness. Workshops have been useful

when the focus is towards driving in depth understanding for specific segment of employees, while awareness initiatives such as frequent communications campaigns are taken up for generic awareness. The responses to the workshops/trainings or awareness initiatives have been very positive.

What type of skill-building workshops are conducted for the IC? And how often are they deployed?

Sasan:

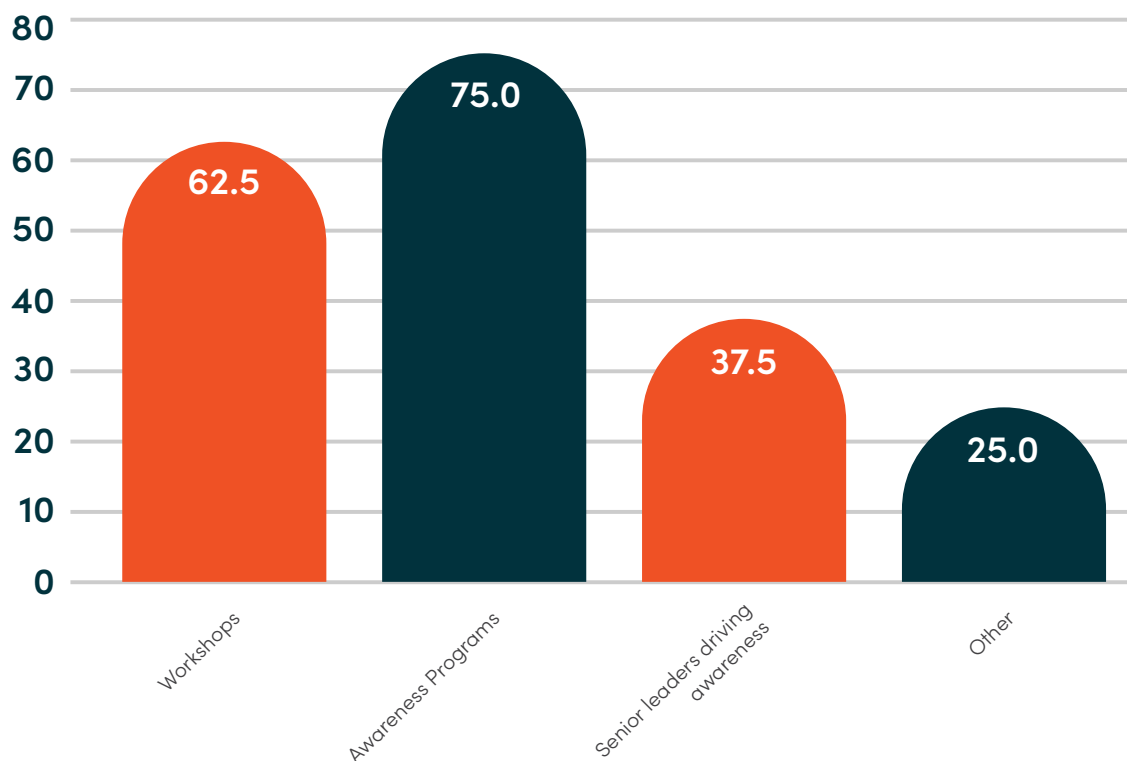
- The PoSH Act places responsibility on the employer to prevent and address the issues of harassment through internal education of its employees. Internal legal team in collaboration with external legal counsel conducts workshops for the Chairperson and new IC members to create awareness on the subject and to enable them to understand their roles and responsibilities as members of the Committee.
- The workshop focuses to train IC members to conduct formal investigations, interviewing tips, legal requirements to accept a case, drawing conclusions, assessing credibility and deciding on corrective action. The workshop also imparts training on closing procedures, timelines to be followed, penalties for contravention of provisions, pointers to write a report and updates to the judicial precedents.
- Workshops every quarter are conducted and additionally IC members are also nominated to attend external workshops.



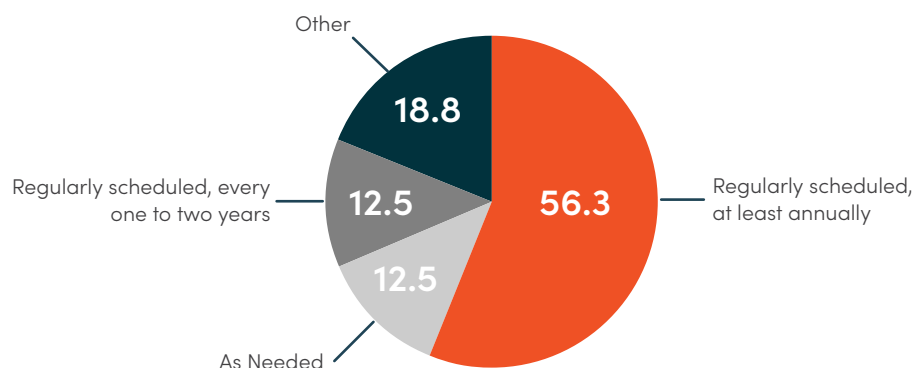
Archana Sasan is Vice President, Dell, India Legal and Ethics. Prior to joining Dell, Ms. Sasan was senior vice president, legal and compliance, for Bharti Airtel, where she had geographic responsibility for India, Bangladesh and Sri Lanka and also oversaw legal, tax litigation and statutory compliance issues for its various business units.

Driving awareness: Seventy-five percent of companies in India continue to educate employees on their rights under the PoSH act through regular awareness programs, and 62 percent make use of employee workshops. Given the cultural sensitivity of discussions around PoSH, which have not traditionally been considered acceptable in an office setting, companies are still working on stepping out of their comfort zone and using innovative modalities to reach employees—for example, only 25 percent report using PoSH-themed videos to communicate directly with employees. Senior leadership driving awareness ranked third among the initiatives. Research repeatedly shows that employees are increasingly looking to leadership to take a stance on critical social issues, and more companies should take advantage of this opportunity to get senior leadership involved to educate and train employees on PoSH compliance.

How are employees educated on India's PoSH Act?



If so, how often are workplace harassment prevention training deployed?



TATA Steel Shares Best Practices on Workplace Sensitization and LGBT Harassment

TATA Steel's Chief Ethics Counsellor, Soni, spoke to Ethisphere about the company's policies and initiatives around LGBT harassment.

What are your overall thoughts on the PoSH act? Why is it a step in the right direction for India and companies?

Soni: PoSH Act – The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 is a legislative act in India that seeks to protect women from sexual harassment at their place of work. Although it was passed by the Lok Sabha on 3 September 2012, but in Tata Steel, we have our sexual harassment policy w.e.f. 14.04.2011.

With respect to country: The percent of women workforce in India as of 2018 report is 26 percent whereas the percentage of women workforce around the world is around 40 percent. We have educated and skilled women workforce, which can be leveraged by providing a safe and friendly workplace environment. PoSH Act is a positive step towards providing a safe working environment for women.

What is TATA Steel doing to communicate and raise awareness about PoSH? Do you have policies around LGBT harassment?

Soni: Customised awareness & communication sessions on PoSH are conducted for contract employees, own employees and senior executives. In addition all employees have to compulsorily undergo a web-based training module, which is tracked and monitored. We also do customised communication through e-magazines like "Neeti Katha" etc.

At present the PoSH policy at Tata Steel is applicable to all its employees irrespective of the gender. We currently do not have any separate policy for LGBT harassment. Some of the initiatives undertaken for LGBT+ inclusion at Tata Steel are as follows:

- Launch of Wings (An LGBTQ+ Employee Resource Group) – to support, track and monitor LGBT activities at Tata Steel
- Financial Assistance for gender reassignment surgery
- Assistance for "coming out" at workplace with sensitization to the concerned department and other stakeholders to ensure the LGBT+ employee isn't made uncomfortable
- Policy for you, by you campaign in June 2019 (Pride Month) to involve employees in formulating policy changes which would be implemented in a phased manner
- Skill-development of transgender people
- Several sensitization sessions conducted – Webinar on "Being an Ally" with an external Diversity & Inclusion Champion, an experience sharing session with a gay stand-up comedian, collaboration with Pride Circle for Sensitization, an edition of Mosaic Pulse Newsletter speaking of LGBT+ Inclusion

What type of support are you receiving from leadership?

Soni: At Tata Steel there is "Zero Tolerance" for unethical acts/conduct including sexual harassment. Our senior leaders have extended all the support required and have put a strong governance structure in place to address the concerns and issues related to the subject.

Does HR and legal work together on dealing with cases around PoSH?

Soni: Yes, HR & Legal works hand in hand at Tata Steel for dealing with the matters related to PoSH and provides the Internal Committee support and guides in effectively conducting the enquiry. Members from both HR and Legal are part of the Internal Committee.

TATA Steel Shares Best Practices on Workplace Sensitization and LGBT Harassment

How does TATA Steel promote an open door policy?

Soni: Tata Steel always believes in transparency in whatever it does. To promote open door policy, there are numerous forums where anyone in Tata Steel can reach out to senior leadership: CEO & MD Online scheduled once in every month wherein he listens and answers queries of any employee across the organisation, Whats Up HRM – VP (HRM) addresses all the HR-related issues of all the employees, JDC Meeting held

in every division where the Vice Presidents of the respective division address queries of their employees. CEO & MD has a dialogue with all the officers once a year and addresses their queries.



Soni is Chief Ethics Counsellor–Tata Steel. She has over 22 years of experience and she holds a B Sc (Engg) and a Chemical Executive Diploma in General Management (Specialization in Operations and Finance) from XLRI.

TATA Steel's Anti Sexual Harassment Initiative (ASHI) – Policy

Tata Steel is committed to providing a place of work that is free of sexual harassment and all forms of intimidation or exploitation of women.

The TATA STEEL LIMITED shall provide healthy working environment that enables employees to work without fear of prejudice, gender bias, sexual harassment and all forms of intimidation of their gender, have the right to be treated with dignity.

In continuation with our endeavour towards improved gender diversity and inclusion along with creating a safe, fair and just workplace, we have put together this policy called Anti Sexual Harassment Initiative (ASHI).

In accordance with this policy, a committee and detailed guidelines have been formed to address the issue of sexual harassment of women at work place. All women employees (permanent, temporary, contract) as well as trainees, women visiting our office premises or women service providers are cover under this policy

If you think someone has crossed the line, then refer to the guidelines on Anti Sexual Harassment Initiative (ASHI) and report to the Internal Complaint Committee.



Best practices from roundtable participants

- Leaders should act out specific scenarios for employees
- When you have a large workforce, you have good talent, we find good actors to go around the floors and act, and ask employees what's wrong with this scenario and how would they go about reporting it
- Some companies have leaders walk the floor and carry a bowl of questions—as we have realized it is hard to bring people to a training, it's best you take the training to them
- Awareness through apps: With the new generation coming in, no one reads/ absorbs information—Accenture has developed an app with policy information. Some companies have considered using WhatsApp as a way to train/educate employees

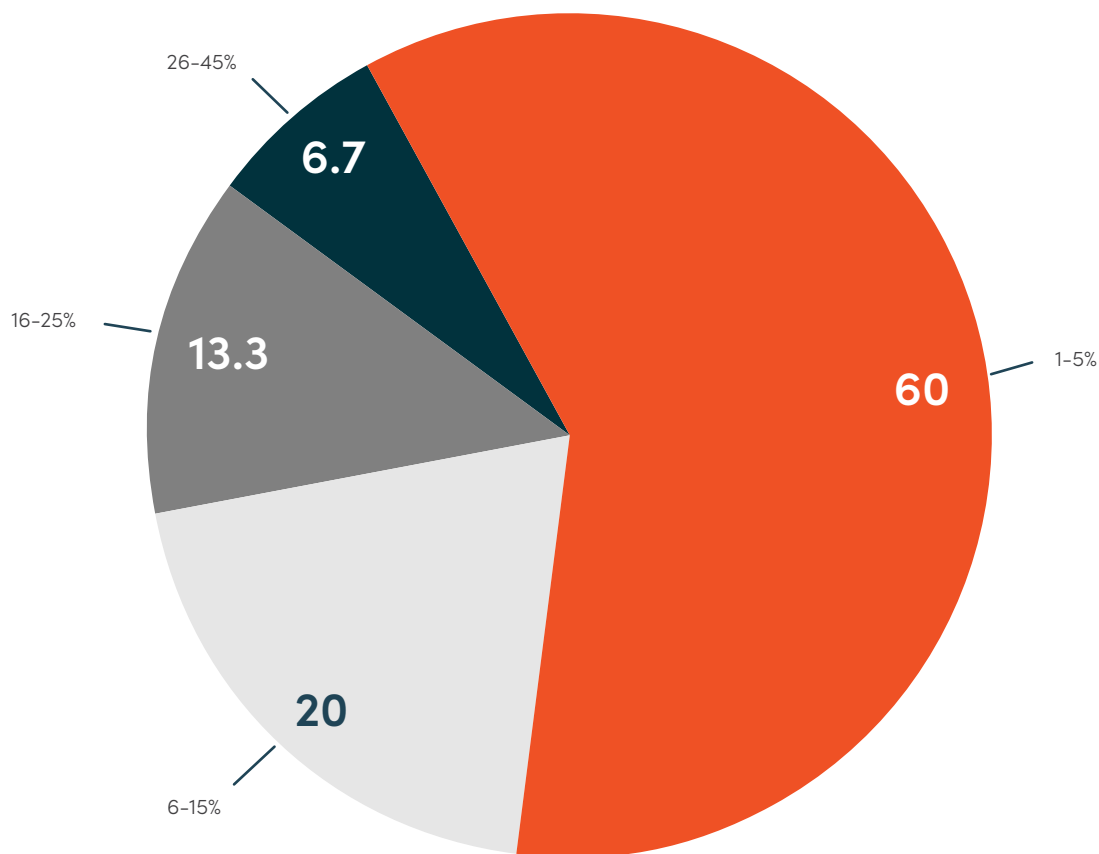


Download TATA Steel's Policy here

Discrimination, retaliation and sexual harassment remain the complaints specifically tracked by companies. Labor issues, compensation and disability remain in the lower tiers of tracking.

As Chart 4 highlights, 60 percent of cases filed fall under the “fair employment” category. According to the Constitution of India, Article 14 states that everyone should be equal before the law. Article 15 specifically says the state should not discriminate against citizens, and Article 16 extends a right of “equality of opportunity” for employment or appointment under the state. Chart 5 indicates that discrimination is one of the main fair employment concerns.

What percentage of total cases reported constitute “Fair Employment” matters?



What categories of Fair Employment concerns (or complaints) are specifically tracked by your company?

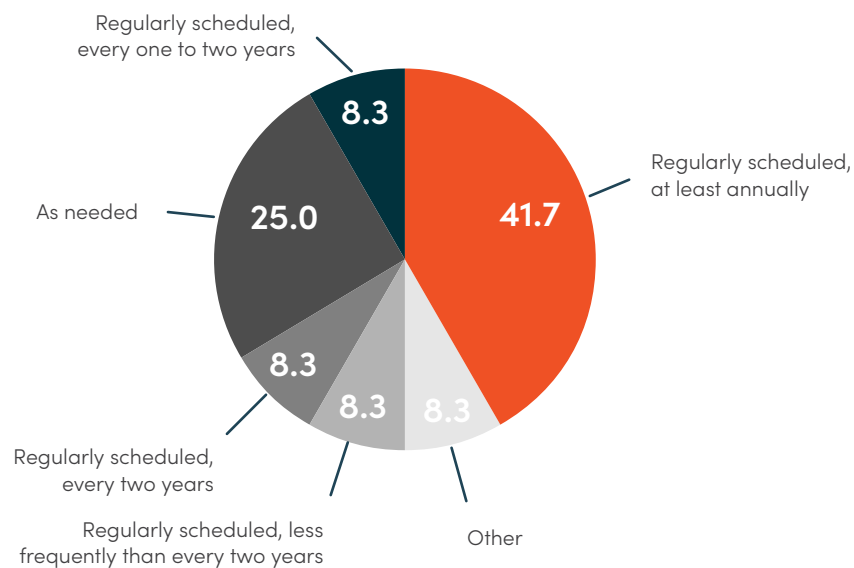


The PoSH Law requires the employer to arrange for the following under the Rules:

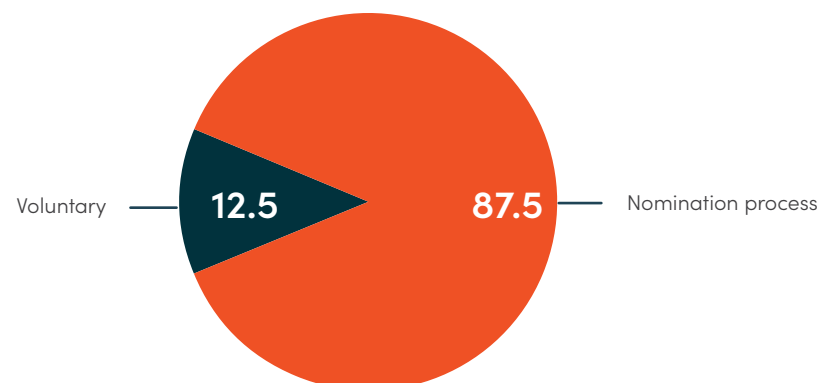
- Publish the POSH Law related policies over the company intranet and/or services rules, which shall include the contact details and names of the internal committee (IC) members;
- Carry out capacity building and skills development programs for IC members; and,
- Use modules published by the state governments to generate awareness amongst employees and may involve collaborations with urban local bodies to promote dialogue on sexual harassment, including its prevention, prohibition and redressal.

As a best practice, it is also beneficial that companies put up PoSH Law related posters in conspicuous places in the workplace about what constitutes sexual harassment, and the composition of IC members against the overlying intent of ensuring a safe workplace. Since the scope of PoSH Law extends beyond employees, putting up the POSH Law related posters at the company entrance, reception and meeting or conference rooms would be a great way to deliver the message to customers, consultants and general visitors to the company premises.

What is the frequency of skill building sessions for the Internal Committee?



How are members of the POSH internal committee selected?



Spotlight: PoSH Compliance at Hindustan Coca-Cola

In the following interview, Ethisphere spoke to Shukla Wassan, Executive Director – Legal & Corporate Affairs – South Asia at Hindustan Coca-Cola Beverages Pvt Ltd about Ethisphere's Best Practices in PoSH report findings.

Can you provide some background on why India needed the PoSH Act, and why is it a step in the right direction for companies?

Shukla: There are more and more women coming into the workforce because of a change in dynamics at home and the economy in general

While corporates were dealing with issues relating to sexual harassment much before the POSH Act came into force, it is the POSH Act that has brought in a structured and formal way of dealing with sexual harassment complaints at the workplace and regular reporting.

The Act was much needed as it provides women with a legally backed platform to raise their issues and have them resolved.

It also helps address a broader societal issue since all workplaces, be it big or small have to comply with the stringent provisions of the Act. Women don't have to be suffering silently; companies and leaders can help and this is a step in the right direction for India.

Tell me more about how you've implemented best practices in POSH. How did you proactively start implementing that, over at Hindustan Coca-Cola?

Shukla: When I joined Hindustan Coca-Cola we established an Internal Committee on the basis of guidelines laid down by the Hon'ble Supreme Court of India in the Vishaka judgement.

These guidelines were superseded by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Accordingly we have established Committees in all of our administrative units. The Committees are presided over by senior woman employees as Chairperson and at least 50 percent of the members are female. We also have on board external lawyers in our committees, who help in ensuring that the procedural aspects are fully complied with.

Training

We train each of these committee members annually and are focused on the following areas:

- How to handle sexual harassment complaints
- What may and may not constitute as sexual harassment
- Cases in the news we can learn from as we believe in continuous improvement

Can you provide some advice to companies seeking to improve or roll out an effective policy?

Shukla: There are a couple of points that I can share here from my own experience:

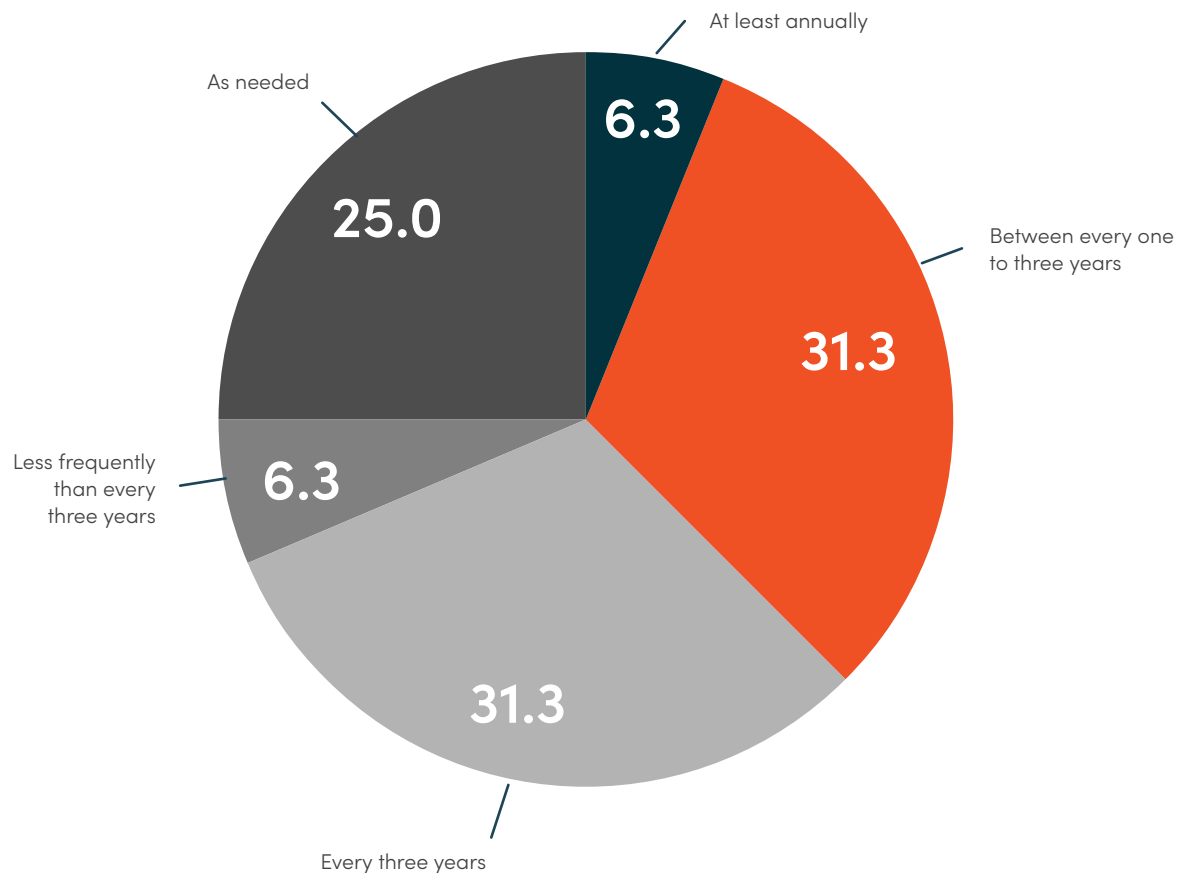
- Ensure the policy is located in a user-friendly place and is easy to understand and if possible both in English and local language
- Sensitize employees so they are aware that these resources are available to help guide them through the reporting process
- Sensitize employees on what constitutes sexual harassment.
- Continuous training: It's good practice to remind employees that we are here to help and we take these issues seriously
- Tone at the top: the culture of zero tolerance towards harassment should be communicated right at the top
- Equal participating of both men and women is extremely important—ours is a gender neutral policy

According to data from our PoSH survey, in from India, 65 percent of companies deploy a workplace harassment training. That is mandatory for all employees, while 50 percent of companies have face-to-face training. As far as your practices go, do you find a face-to-face training to be, in a way, more effective, especially maybe at plants, as you mentioned?

Shukla: We have an online training module and have had sensitization sessions for leadership and training for all Committee Members. I would say that face-to-face training is much more effective as you can do role plays, use stories and allow employees to engage with the topic. Face-to-

The **PoSH** Act requires the employer to specify the term of office of the members of the IC, which period should not be more than three years from the date of their nomination. The data shows that there's an even split between rotating of IC members between one to three years and those who circulate members every three years. At the same time, 25 percent of companies rotate IC members "as needed". At DELL, for example, when a new IC member comes on board, the internal legal team and external legal counsel conduct workshops for new IC members to create awareness on the subject and to enable them to understand their roles and responsibilities as members of the Committee.

Do you rotate the IC members?



Spotlight: PoSH Compliance at Hindustan Coca-Cola

face training also allows us to address critical issues that can be easily taken for granted. It is also an opportunity of clarifying doubts, if any. Any type of training that can be done visually resonates better with an employee base rather than a long document. In short, taking a simplified approach matters, especially when we consider the workforce demographics.

The impact of the #MeToo movement has started gaining traction in India. How do you communicate with employees and leadership that the company is here to help?

Shukla: The key is being prepared. When the #MeToo movement occurred, we had shared a note to the leadership team and employees reiterating the PoSH policy and sharing highlights from the policy to the entire team.



Shukla Wassan is the Executive Director - Legal & Corporate Affairs, South Asia, of Hindustan Coca-Cola Beverages Pvt. Ltd., and also the Chairperson and Board Member of Coca-Cola

entities in Nepal, Bangladesh and Sri Lanka. She has over three decades of experience in the areas of Joint Venture, Strategic Alliances, Fund Structuring, Intellectual Property, Indirect Taxation, Competition Law and Corporate Governance & Compliances. She has been awarded the ICCA Excellence Award 2019 in F&B Sector by the Indian Corporate Counsel Association, Corporate Lawyer of the Year by the Annual Women in Compliance Awards-2017 by C5 Communications Limited (formerly known as Euroform) a subsidiary of C5 Group Inc., UK. She was also awarded the jury award for Outstanding Achievement – In house - Female 2013 and General Counsel of the Year (Female) 2014 at the Annual LegalEra Awards.

A REFRESHING LOOK AT A COMPLIANCE PROGRAM THAT WORKS

In the 2018 BELA South Asia Magazine, Shukla Wassan shared her thoughts on Coca-Cola's Five-Point Plan for Ethics and Profitability

In today's complex and increasingly competitive business environment, business ethics is an important catalyst for the success of a company. It is vital to have in place a truly effective ethics and compliance program—your survival and business continuity and sustainability depend on it! The adoption of a code of ethics for employees is now the norm in larger businesses throughout the world. The increasing importance and relevance is being now felt and adopted by medium and small-scale businesses. That said, the need of the hour is to have in place an effective ethics and compliance program that WORKS and does not function as a check-the-box item. That points to an important question: What are the ingredients of an effective ethics and compliance program? From our experience in the field and what I have seen at Hindustan Coca-Cola Beverages Pvt. Ltd, it all comes down to a commitment to ethical behavior and the need for continuous improvement.



[See the full article here](#)

The 2019 BELA South Asia Magazine

ETHICAL LEADERSHIP IN INDIA

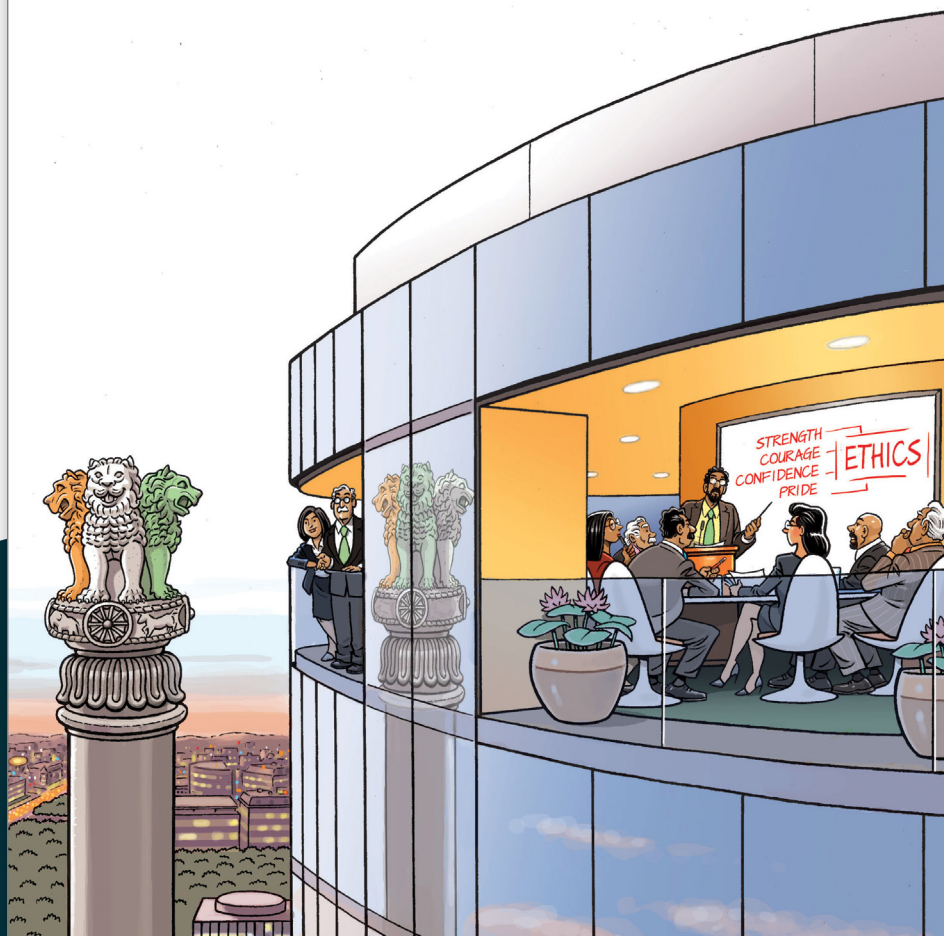
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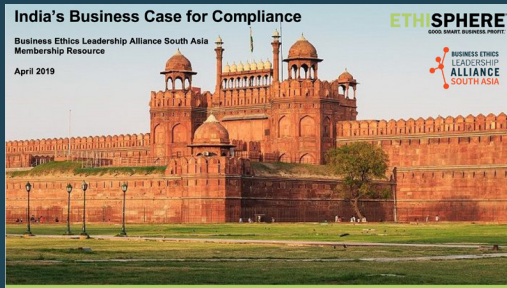
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BELA South Asia India Business Case Deck



Government Official Resigns As #MeToo Movement Gathers Force In India

October 16, 2018 - 4:31 PM ET

FURKAN LATIF KHAN | SUSHMITA PATHAK



Genpact assistant V-P Swaroop Raj commits suicide in Noida over accusations of sexual harassment

Swaroop Raj had been suspended from his company over the allegations till the case was being probed

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India Today Web Desk
New Delhi
December 20, 2018 UPDATED: December 20, 2018 13:14 IST



Swaroop Raj, assistant vice-president of Genpact, joined the company in 2007.

HIGHLIGHTS

- * Swaroop committed suicide at his Noida home early Tuesday morning
- * He had been under psychological pressure after his company suspended him
- * He was accused of sexual harassment by two employees at the firm

The New York Times

After a Long Wait, India's #MeToo Movement Suddenly Takes Off



The writer Sandhya Menon, left, and the Bollywood actress Tanushree Dutta speaking



Download the India Business Case
for Compliance Deck

Ethisphere developed this survey at the behest of the BELA South Asia member community in an effort to gather information on best practices of the community around workplace harassment, including the implementation of Prevention of Sexual Harassment (PoSH) initiatives and trends across the industry.

The data gathered as part of this survey was anonymized and used to generate insights for you and the global BELA community.

The survey contained approximately 23 questions.

Note on confidentiality: Ethisphere does not collect identifying information such as name, email address, or IP address. Therefore, responses in this survey are kept confidential and anonymous. No one will be able to identify participants or answers, and no one will know who participated in the study.

Ways to Access Additional EQ Data

Since 2007, Ethisphere has been measuring companies using our Ethics Quotient® Survey (EQ). Our EQ, the foundation of all that we do, has evolved into a tool that global organizations depend upon as an independent, objective, third-party assessment of their programs, policies, and procedures and as a critical element of resource planning. The data we collect is included in our proprietary database, upon which all resulting comparisons, benchmarking reports, consultations, and recognitions are based.

For companies interested in learning more, Ethisphere provides several ways in which companies can leverage our EQ data and insights for practical program improvements:

Compliance Program Assessment

Deep Insight into Your Compliance & Ethics Program Effectiveness

Ethisphere's deepest evaluation offering—its Compliance Program Assessment—offers a comprehensive review, evaluation, and validation of your current programs and practices while fulfilling the Federal Sentencing Guidelines' element of "Periodic Review" of the program.

EQ Benchmarking and Road Map*

A Robust View into Your Program, Policies, and Procedures

Get a more complete understanding of your current program and practices with a robust view into your responses vs. leading and peer companies and present key findings to leadership with the EQ Peer Benchmarking Presentation.

Ethics & Compliance Program Maturity Index *Gauge the Temperature of Your Program*

An efficient, self-driven assessment for identifying strengths and gaps of key program elements and benchmark practices against the World's Most Ethical Companies® in the areas of program structure, training and communications, and monitoring, auditing, and risk assessment.

Focused Facts*

Bespoke, Data-Driven Mini-Reports to Tackle Your Most Pressing Compliance Concerns

Focused Facts reports leverage all of Ethisphere's data sets to address your topical questions and concerns. Ethisphere's team of analysts will build a concise report customized to your most pressing compliance, ethics, and cultural concerns.

Measuring and Assessing Culture

Gain Insights into Your Most Critical Asset—Your Employees

Evaluate the effectiveness of your communication, training, and compliance efforts and the willingness of your people to raise concerns against our Eight Pillars of Ethical Culture. Using a proprietary library of survey questions, Ethisphere manages the complete administration of the survey, provides a qualitative analysis of your assessment findings, and gives you the tools to segment and explore areas of strength and opportunity across your enterprise.

*Indicates a service that is included with Ethisphere's Business Ethics Leadership Alliance (BELA) membership

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ABOUT ETHISPHERE

Ethisphere is the global leader in defining and codifying the standards of ethical business practices that fuel corporate character, marketplace trust, and business success. Ethisphere has deep expertise in advancing business performance through data-driven assessments, benchmarking, and guidance.

Our Ethics Quotient data set enables the ability to benchmark against the ethics and compliance practices of leading companies across sectors and industries. We also work with the world's largest companies to assess and enhance ethical culture capital with the insights from our culture assessment data set, which represents the views of millions of employees worldwide and is grounded in our Eight Pillars of Ethical Culture.

Ethisphere honors superior achievement through its World's Most Ethical Companies recognition program and by showcasing best practices in *Ethisphere Magazine* and at global events. We also facilitate the Business Ethics Leadership Alliance (BELA), a global community committed to solving the big challenges of business integrity together. More information about Ethisphere can be found at <https://ethisphere.com>.



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