



Tunnel vision or the bigger picture?

How a focus on enhanced governance can help reimagine corporate integrity

Global Integrity Report 2022

Forensic & Integrity Services

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The better the question.
The better the answer.
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Building a better
working world

Foreword

Our last Global Integrity Survey was carried out just weeks after the COVID-19 global pandemic was declared. Already we could see that the pandemic posed significant threats to organizational control and processes, but few in April 2020 would have foreseen that the post-pandemic disruption would continue to challenge companies some 18 months later.

Sudden and tectonic change creates opportunities for unethical behavior, including fraud and corruption. On the one hand, companies facing intense commercial pressure overlook normal vetting processes that govern third-party relationships; on the other, senior management, focused intently on business survival, may rationalize unethical behavior. Further, when much of the employee base is working remotely, risks are heightened and controls and processes have to be transformed to meet the new reality. These are operational challenges facing legal and compliance teams around the globe.

The EY 2022 Global Integrity Report reveals that, while the pandemic has made it harder for businesses to act with integrity, more companies than ever value corporate integrity and its benefit to reputation and employee retention. Since the pandemic arose, companies have continued to increase training, communication, and awareness-raising of integrity issues with their employees.

The challenge is a growing gap between what organizations' senior leaders say is important and what they are prepared to do for individual gain. What is sometimes called the "say-do" gap is not lost on employees as their confidence in the integrity standards of their management is much less than the managers' confidence in themselves. This year's survey exposes the difference between paying lip service to integrity standards and building a deep integrity culture. It exposes the danger of box-ticking while ignoring the more important ambition of creating a culture which supports ethical decision making.

Societal expectations of businesses to act ethically are only growing: pressures to report on a company's environmental, social and governance (ESG) commitments are translating, in some parts of the world, into international standards. In this environment, it is not enough to claim to care about corporate integrity: it is necessary to act. The EY 2022 Global Integrity Report sounds a warning bell to corporate boards, chief legal officers and compliance officers to close the gaps between the board, management, and employees so that they can focus on ensuring high ethical standards throughout their organization and harness data to deliver these goals.



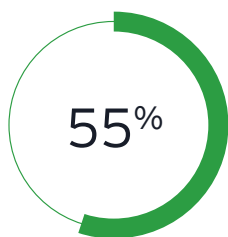
A handwritten signature in black ink that reads "Andrew Gordon".

Andrew Gordon
Global Leader
EY Forensic & Integrity Services

Spotlight on the numbers

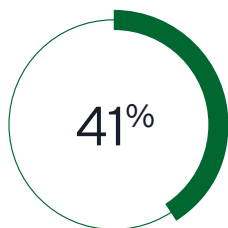
Key data points from the EY Global Integrity Report 2022 show a widening gap between higher levels of integrity awareness and lowering standards, as well as between the confidence in integrity standards displayed by companies' leadership ranks and their employees. Moreover, the pandemic is widely acknowledged to have made it more difficult to carry out business with integrity. For example, over half the respondents surveyed say that integrity standards have either plateaued or worsened over the last 18 months.

Declining standards



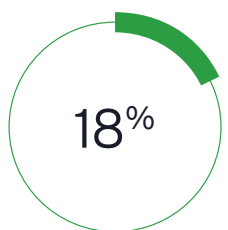
55% of respondents believe that standards of integrity have either stayed the same or worsened over the last 18 months.

Pandemic influence



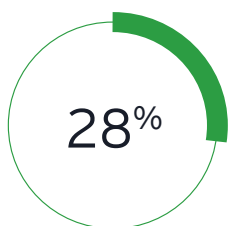
41% of respondents (and 54% of surveyed board members) say that the COVID-19 pandemic has made it more difficult to carry out business with integrity.

Misconduct

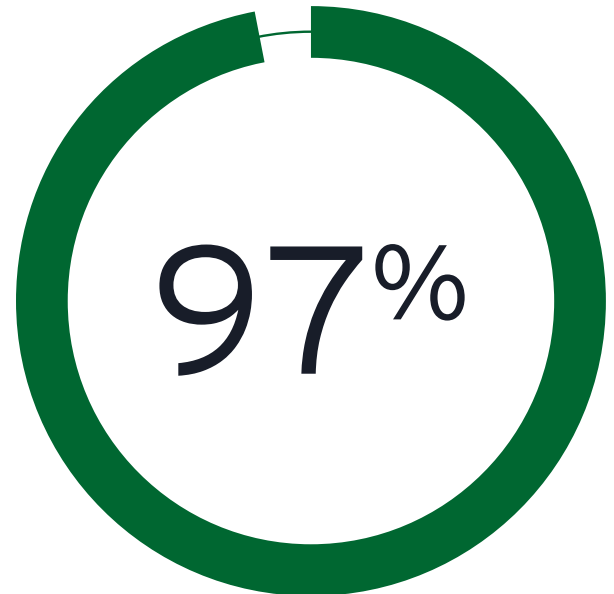


18% of all surveyed board members would be prepared to mislead external parties such as auditors or regulators to improve their own career progression or remuneration. This is six times that of employees.

Third-party risk

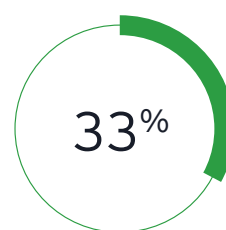


Only 28% of employees are confident that third parties abide by relevant laws and regulations.



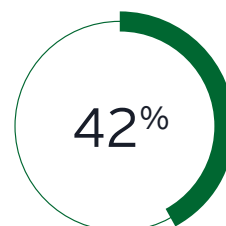
97% of respondents to the Global Integrity Report 2022 agree that integrity is important. With that awareness, companies are increasing their investment in training and processes.

Ethical standards



Despite this: Only 33% of respondents believe behaving with ethical standards is an important characteristic of integrity. 50% of respondents, in turn, cite compliance with laws, regulations and codes of conduct as being an important characteristic of integrity.

Unethical behavior



42% of surveyed board members agree that unethical behavior in senior or high performers is tolerated in their organization (up from 34% in 2020).

Note to the Reader: Please note that this survey is designed to be as global as possible, within practical constraints. We have conducted a broad survey of geographies, sizes of organization, and employee levels. As such, the survey results identify responses from a broad data set and may not be indicative of the reader's domicile but reflect trends identified by respondents in a more diverse set of circumstances. This survey includes the views of individuals who have self-identified as a board director. We do not define 'a board' within the context of this survey; references to board directors could, therefore, include a variety of board types across the range of organizations at which survey respondents are working.



Introduction

Bridging the gap between
intentions and actual behaviors

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Organizational culture is dynamic
and takes far longer to change
than rules and regulations.

Maryam Hussain, Ernst & Young LLP (UK), Forensic & Integrity Services, Partner

Corporate integrity is highly valued by senior executives and employees around the world – in fact, even in the immediate aftermath of the pandemic, the EY Global Integrity Report 2022 showed that a record 97% of respondents say that corporate integrity is important. It is foundational to fostering trust between shareholders and executives; companies and employees; and, suppliers and partners. Companies are increasing their reinforcement of integrity values through communication and training; compared with 2020, more companies have a code of conduct (53% vs. 47%), more companies are investing in regular integrity training (46% vs. 38%), and more companies have a statement of organizational values in place (37% vs. 34%).

This strengthening awareness of the importance of integrity is playing out against an environment of evolving social expectations of business. We are placing ever-greater responsibilities on corporate leaders: the latest Edelman Trust Barometer, for example, reports that 68% of respondents expect CEOs to fix societal problems left untackled by government, and 65% say that CEOs should be as accountable to the public as they are to shareholders.¹

In line with these rising expectations, companies are being asked to report more formally on the nonfinancial aspects of their operations – not just on Corporate and Social Responsibility (CSR) or their philanthropic and community programs that fall outside their core business, but also Environmental, Social and Governance (ESG) measures that define how their core business impacts the planet and its people. Measures to harmonize green accounting standards, such as the work by the International Financial Reporting Standards (IFRS) Foundation, will bring greater scrutiny to companies' statements and increase the need for robust measurement and transparency. They will, in effect, provide a degree of confidence in companies' statements and promises – or in the integrity of those statements.

But even as these many positive trends help shine a light on how organizations behave, corporate scandals continue to end promising careers, diminish share values, and rock the public's trust in business.



The results show how organizations are struggling to close the gap between rhetoric and reality (the “say-do” gap), how senior management is often overconfident of the effectiveness of corporate integrity programs, and how the pandemic has created new challenges that leaders must now overcome through innovation and transformation.

Management should be under no illusion that integrity is an easy fix. “You can't just 'do' an internal integrity project and expect that it will immediately transform the culture and behaviors of all the complex individuals, subcultures, and networks that comprise an organization. It requires management investment in the right blend of skillsets, science, and organizational fortitude,” explains Maryam Hussain, Partner, Forensic & Integrity Services, Ernst & Young LLP (UK). The report results further illustrate that creating a deep

culture of integrity relies on tightening bonds between the most senior layers of the organization and the most junior.

As we emerge from the pandemic and begin the processes of rebuilding the economy, recalibrating how and where work is performed, and rewriting processes for an increasingly digital operating environment by creating digitally driven processes and incorporating artificial intelligence (AI); we have an opportunity to close the gap between what we say is important and our actions. AI may be used for pre-emptive escalation of gaps, to drive decisions automatically, and to reduce the gap between saying and doing by driving consistency. Ultimately, integrity in business is not about compliance box-ticking and risk management: it's about protecting the organization, its assets, and its reputation; all of which drive long-term sustainable value. The EY Global Integrity Report 2022 offers insights on how companies can define and instill integrity into their culture, how to create the optimal environment for integrity to thrive, and how we can innovate and transform the integrity agenda to minimize external threats and protect value.

Which, if any, of the following does your organization have in place?



Base: Global Integrity Report 2022 (4,762) and Global Integrity Report 2020 (2,948)

¹ “Edelman Trust Barometer,” Edelman website, <https://www.edelman.com/trust/2021-trust-barometer>, accessed 12 November 2021.



1 Does integrity matter?

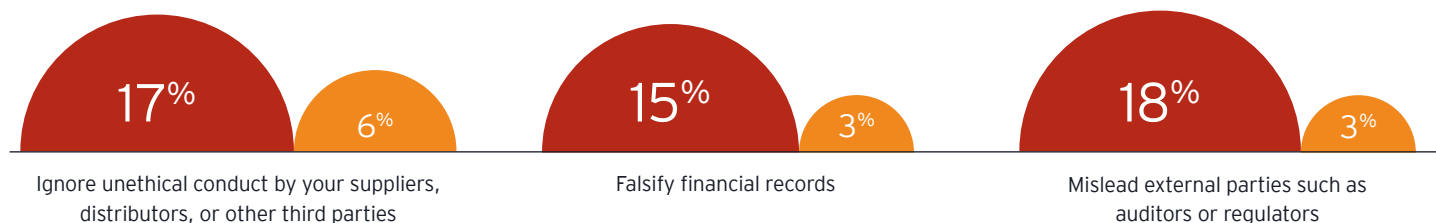
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Companies do not have the same mechanisms for instilling integrity across their organizations, as ethical dilemmas manifest themselves differently. Integrity should, therefore, be a fundamental component of corporate strategy in every organization.

Andreas Pyrcek, Ernst & Young GmbH, Global Integrity & Compliance Services Leader

Which, if any, of the following would you be prepared to do to improve your own career progression or remuneration package (your pay or any bonuses you might receive)?

■ Board member ■ Other employee



Base: Global Integrity Report 2022, Board member (442), Other employee (1031)

It's more than three decades since Stephen Covey wrote his bestselling management guide, *The 7 Habits of Highly Effective People*, yet his definition of integrity as "conforming reality to our words, keeping promises, and fulfilling expectations"² is still highly relevant. It is about ethics, transparency, and human behavior. "Companies have different definitions of integrity because they are faced with different ethical dilemmas," says Andreas Pырcek, EY Global Integrity & Compliance Services Leader. "Nevertheless, integrity should be a fundamental component of corporate strategy in every organization."

At the organizational level, it's a whole enterprise, even whole ecosystem, play. "Too often we rush to the "bad apple" explanation for unethical behaviour without examining the state of the "barrel" of the organisational culture that fostered the behaviour," says Hussain.

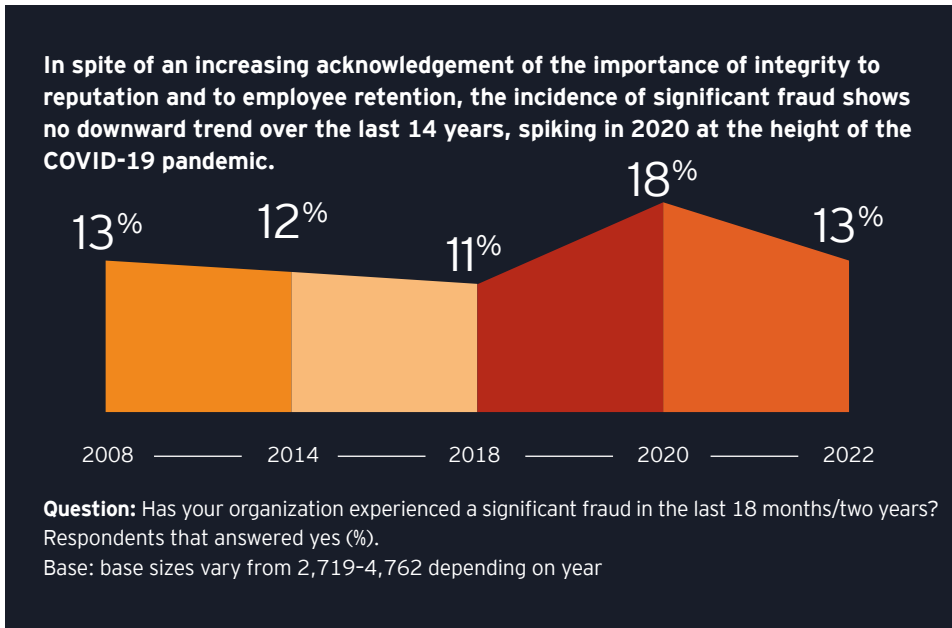
This is why company leaders should be very concerned that the EY Global Integrity Report 2022 shows only a third (33%) of respondents believe that an important characteristic of integrity is behaving with ethical standards, while half (50%) cite compliance with laws, regulations and codes of conduct. Even when it comes to compliance, our findings show a growing willingness among the most senior company ranks to act outside the rules.

Board members surveyed as part of this report are almost three times as likely to ignore unethical conduct by third parties as their employees (17% vs. 6%), five times as likely to falsify financial records (15% vs. 3%), and six times as likely to mislead external third parties such as auditors (18% vs. 3%). Given this, it is not surprising that more than half (58%) of board members would be fairly or very concerned if their decisions came under public scrutiny, compared to just 37% of employees. While this is only one snapshot of board behavior, which may vary considerably by type of business, region and individual country, the data did show a significant change in emerging markets where board members' propensity to act unethically increased from 34% to 41% between 2020 and 2022.

It isn't just that senior managers can be more likely to neglect standards than their employees; they are also out of touch with how their workforce perceives integrity values within the organization. More than three quarters (77%) of board members and senior managers are confident that employees in their organizations can report wrongdoing without fear of negative consequences, but one-fifth (20%) of employees either disagree or strongly disagree. Interestingly, in this year's Global Integrity Report, a lower volume of survey respondents reported misconduct in their organization, a drop from 23% in 2020 to 19% in 2022.

At EY, we believe that corporate integrity should be a cultural imperative. It's about creating a culture which supports ethical decision making. Integrity breeds trust, it guides organizations to manage data well, and it protects against the temptation to pursue short-term gains at the expense of ethical behavior.

² Stephen R. Covey, *The 7 Habits of Highly Effective People* (New York: Simon & Schuster, 1989).



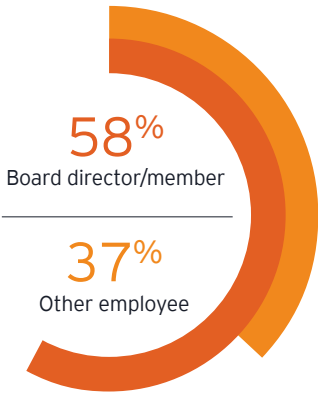
These report findings reveal a danger that organizations may have relegated their integrity agenda to box-ticking and training with no real attention given to deepening their integrity culture. “Integrity isn’t an easy topic,” says Jon Feig, Ernst & Young LLP, Forensic & Integrity Services, Americas US-Central Region Leader. “The integrity agenda rests on organizational intent and actual behavior. A profitable decision for the wrong reasons is still a wrong decision if it fails ethical values.”

The pandemic has only increased the challenge for leaders: 41% of all respondents and over half (54%) of board members say that COVID-19 is making it more difficult to carry out business with integrity. Disruptions to supply chains and the overnight arrival (for many) of the distributed workforce added to a fight for corporate survival. Increased digitization, which has moved more and more of a company’s operations to the cloud, has further tested their risk management processes.

The risk landscape has become more disruptive: according to the EY Global Board Risk Survey 2021 of more than 500 board directors around the world, 87% of boards say market disruptions are becoming more frequent and 83% say they are increasingly impactful.³

It’s not just the EY Global Board Risk Survey that reveals the impact of these shifts: over half (56%) of respondents to the 2021 EY Global Information Security Survey say businesses have side-stepped cyber processes to facilitate remote and flexible working in the wake of the pandemic.⁴ “Companies have had to focus on survival,” says Pyrczek, “jettisoning non-essential activities that may include their integrity agenda. Now they have to rethink procedures for a post-pandemic era with a distributed workforce and a pivot to full digitization.”

How concerned would you be if information about decisions you have taken as part of your work were subject to public scrutiny?



Note: Respondents who answered “fairly concerned” or “very concerned”.

Base: Global Integrity Report 2022, Board member (442) Other employee (1031)

The majority of companies (93%) have at least one of a mix of training, codes of conduct, and whistleblowing policies in place. But, even though 59% of respondents say they have “training for employees” and this is up 8% from 2020, a significant one in six (15%) of those employees say that the measures highlighted above either don’t exist, or that they don’t know whether they exist.

Although organizations are investing more in communication and training programs, that messaging alone is not enough to create a culture of integrity. While 60% of board members say that their organization has frequently communicated about the importance of behaving with integrity in the last 18 months, only half that percentage (30%) of employees remember it. A similar gap is seen across the report – from policies on working from home (80% vs. 51%) to training on data privacy regulations (52% vs. 35%).

³ “EY Global Board Risk 2021”, EY website, https://www.ey.com/en_gl/risk/how-todays-boards-can-meet-tomorrows-challenges, accessed 2 November 2021.

⁴ “EY Global News”, EY website, https://www.ey.com/en_gl/news/2021/08/over-half-of-asia-pacific-businesses-are-unsure-if-their-cybersecurity-defenses-are-strong-enough-amid-growing-threat, accessed 19 August 2021.

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A profitable decision for the wrong reasons is still a wrong decision if it fails ethical values.

Jon Feig, Ernst & Young LLP (US), Forensic & Integrity Services,
Americas US-Central Region Leader



2

Creating the
optimal integrity
environment

Integrity is core to business leadership and it is supported by compliance and risk officers as partners to the business. The integrity with which the corporate strategy is delivered will determine long-term business success. In 2021, while compliance programs grew in scale, global business leaders appear to have become more tolerant of unethical behavior.

Standards at the top have dropped significantly in the aftermath of the pandemic: more than four in ten (42%) board members agree that unethical behavior in senior or high performers is tolerated in their organizations (compared to 34% in 2020); more board members (34%) agree that it is easy to bypass the business rules in their organization than in 2020 (25%); 18% of board members would mislead external parties such as auditors and regulators (compared to 14% in 2020); 15% would falsify financial records (compared to 12% in 2020); and 14% would offer or accept a bribe (compared to 12% in 2020).

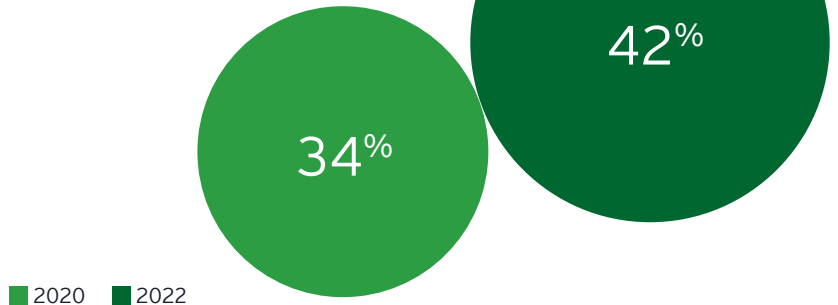
Among a list of fraudulent activities, including falsifying financial records, taking or offering bribes, and misleading regulators or auditors, 43% of board members and 35% of senior managers would do at least one of these for personal gain. While this is just one snapshot, and behaviors of individual board members may vary considerably across geographies, sectors, and size of organizations; it is hard to see how an employee in an organization whose leaders hold these views will be motivated to act ethically. Particularly if there are temptations to bend the rules.

Employees at all levels need to be confident that they can report without fear of negative consequences and, as importantly, that violations bear consequences. Too often, employees feel reporting won't trigger change: indeed, survey respondents say the dominant reason (38%) for non-reporting is a concern that no action would be taken (up from 33% in 2020).

In spite of the importance of the ease and safety of reporting to integrity, globally, fewer respondents (36%) agree that it is easier for employees to report concerns than in the 2020 report (39%). There is again a divide between board perceptions where almost half (47%)

To what extent do you agree or disagree with the following statement?

Unethical behavior in this organization is often tolerated when the people involved are senior or high performers.

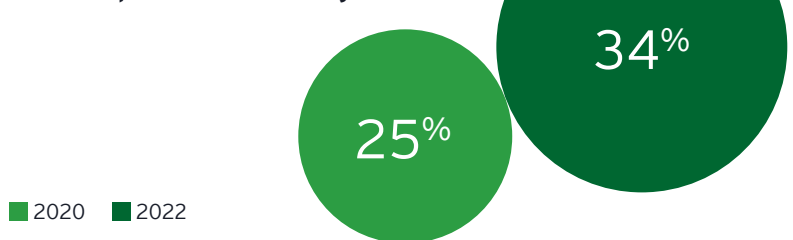


Note: Board members who answered "tend to" or "strongly agree".

Base: Global Integrity Report 2022 Board members (442), and Global Integrity Report 2020 Board members (333)

To what extent do you agree or disagree with the following statement?

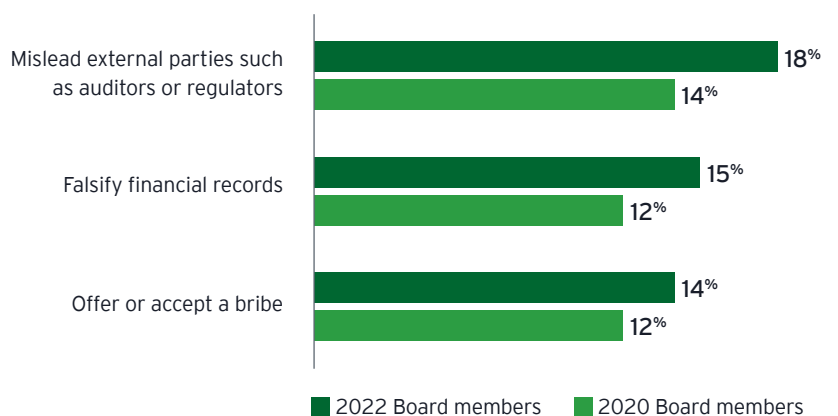
It is easy to by-pass the standard business rules and processes in this organization.



Note: Board members who answered "tend to" or "strongly agree".

Base: Global Integrity Report 2022 (Board members (442), and Global Integrity Report 2020 (Board members (333)

Which, if any, of the following would you be prepared to do to improve your own career progression or remuneration package (your pay or any bonuses you might receive)?



Base: Global Integrity Report 2022 Board members (442), and Global Integrity Report 2020 Board members (333)

believe it has gotten easier compared with employees themselves (25%). "It's fundamental for management and employees to trust that whistleblowers are protected," says Feig. "It's mutual protection: we ask that employees keep the business safe and, in return, we need to protect them."

An optimal integrity environment is a whole-enterprise environment in which values are shared across every level of seniority and function, there is a high degree of transparency, and a zero tolerance of transgression. "If someone isn't part of the culture, management needs to act," says Pyrcek.

Organizations can utilize data and AI to pinpoint potential adverse changes in the day-to-day operations of a business unit, team, or department – these can be early warning signs of an inconsistent or eroding culture.

A progressive integrity agenda goes beyond restrictive compliance (whereby we are prevented from doing something by the law); opportunistic compliance (doing something because the law allows it, so why not if it's not illegal); and avoidance of litigation (we did this to avoid being sued). "It's about making the intangible tangible, about exploring the wider relationship between society and business, and encoding the behaviors of a good corporate citizen," says Katharina Wegmann, Ernst & Young GmbH, Forensic & Integrity Services, Partner.

The degree to which companies offer protection to whistleblowers in their organizations is an essential benchmark of integrity culture. It is encouraging to see that protection measures have improved significantly over the last three years (see map).

This matters because corporate integrity goes to the very core of a company's license to operate. The pandemic has showed us that, when catastrophe hits the global economy, many companies have depended on the rescue interventions of governments and the taxpayer. Companies have a responsibility to act ethically and to manage resources for the common good. Shareholders, employees, customers, and the public at large expect it.

Whistleblowers: protection and reward

EU Directive

Companies operating in the EU have been preparing to comply with the 2019 Whistleblower Protection Directive, which is to pass into law in all member countries by December 2021.⁵ It requires that every company must have established safe channels for safely reporting any breach of EU law in a work-related context. More importantly, the Directive offers protection for whistleblowers against retaliation, in addition to protecting their identity. The Directive provides that there should be penalties for companies that retaliate against whistleblowers but leaves the form and scope of sanctions to individual countries.

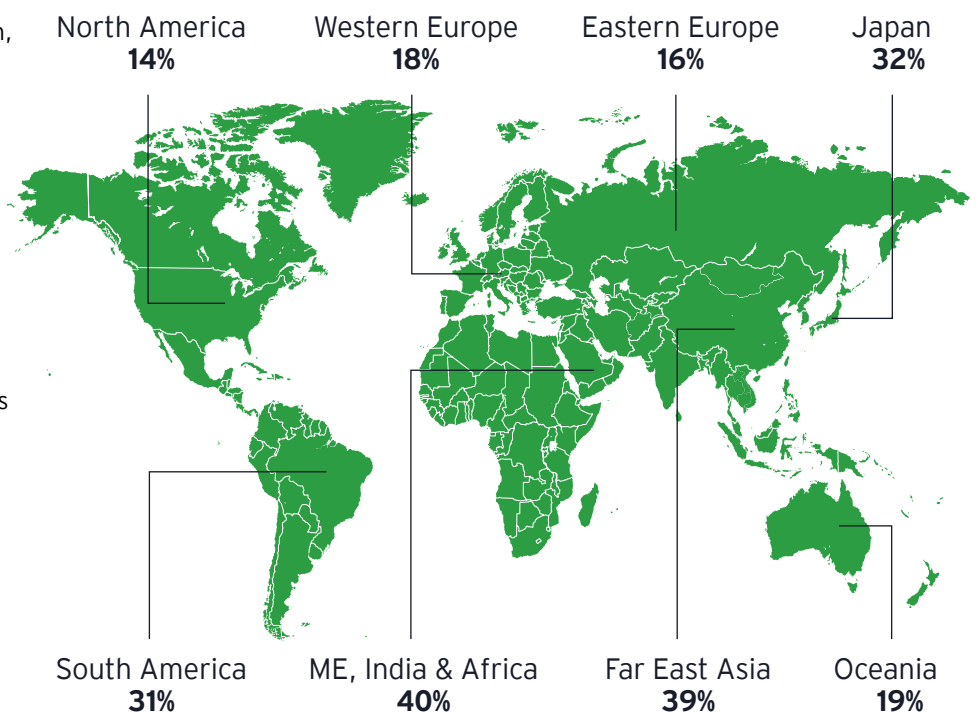
U.S. Securities and Exchange Commission (SEC)

In fiscal year 2021, the SEC awarded approximately \$564 million to 108 individuals – both the largest dollar amount and the largest number of individuals awarded in a single fiscal year. The awards made in fiscal year 2021 also include the Commission's two largest awards to date – a \$114 million award in October 2020 and a combined \$114 million award to two Whistleblowers in September 2021. The most common violations reported by whistleblowers were manipulation (25%), corporate disclosures and financials (16%), offering fraud (16%), trading and pricing (6%), and cryptocurrencies (6%).⁶

⁵ "EU Whistleblowing Directive a 'potential minefield' for compliance", Compliance Week website, <https://www.complianceweek.com/whistleblowers/eu-whistleblowing-directive-a-potential-minefield-for-compliance/30361.article> 10 May 2021.

⁶ "2021 Annual Report to Congress Whistleblower program", U.S. Securities and Exchange Commission, The SEC website, <https://www.sec.gov/files/owb-2021-annual-report.pdf> 16 November 2021.

Surveyed respondents who agree whistleblowers are now offered more protection than three years ago (%)



Base: Global Integrity Report 2022 (4,762)

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It's about making the intangible tangible, about committing to the interdependence of business and society by embedding integrity into the culture and behaviors of the organization.

Katharina Wegmann, Ernst & Young GmbH, Forensic & Integrity Services, Partner



3 Digital, innovation and transformation

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There is more legislation governing data protection, privacy and cyber crime on the radar in China. These regulations affect all corporations operating in or doing business with the region, including multinationals.

Diana Shin, Ernst & Young China, Forensic & Integrity Services, Partner

61%

61% of respondents agree that data protection and privacy legislation is beneficial for business.

Data protection and privacy regulations have, unsurprisingly, been the focus of a range of new legislation over recent years. The majority of respondents to the EY Global Integrity Report 2022 view this as positive, with more than six in ten (61%) agreeing that data privacy legislation is beneficial for business. In many European states, the General Data Protection Regulation (GDPR) is now firmly embedded in online activity. Similarly, China has introduced the new Data Security Law and Personal Information Protection Law as a means to develop its existing 2017 Cybersecurity Law (CSL). Such legislative changes are having a profound impact on how multinational organizations conduct business as protecting data is becoming increasingly fundamental to how they operate.

It is far from simple to say where a business starts and where it stops, and this opens the organization to a range of integrity risks. It also increases the need to shrink the distance between all the groups, hierarchical layers, and functions that comprise the organization. The EY Global Integrity Report 2022 shows how quickly mismatches between senior management's perceptions and their employees can develop. Tightening the bonds between all the parts of the organization creates closer understanding and knowledge while deepening a shared culture.

The increased reliance on automation and digital platforms also raises important risks. As data systems become increasingly fundamental to the operation of a business, issues such as data quality, data completeness, and AI models not performing correctly are no longer simply "technical problems" or an issue for IT colleagues to exclusively manage.

Business-critical data systems should have many stakeholders involved in shaping and curating these systems, continuously monitoring their outputs, and remediating any challenges with the highest priority.

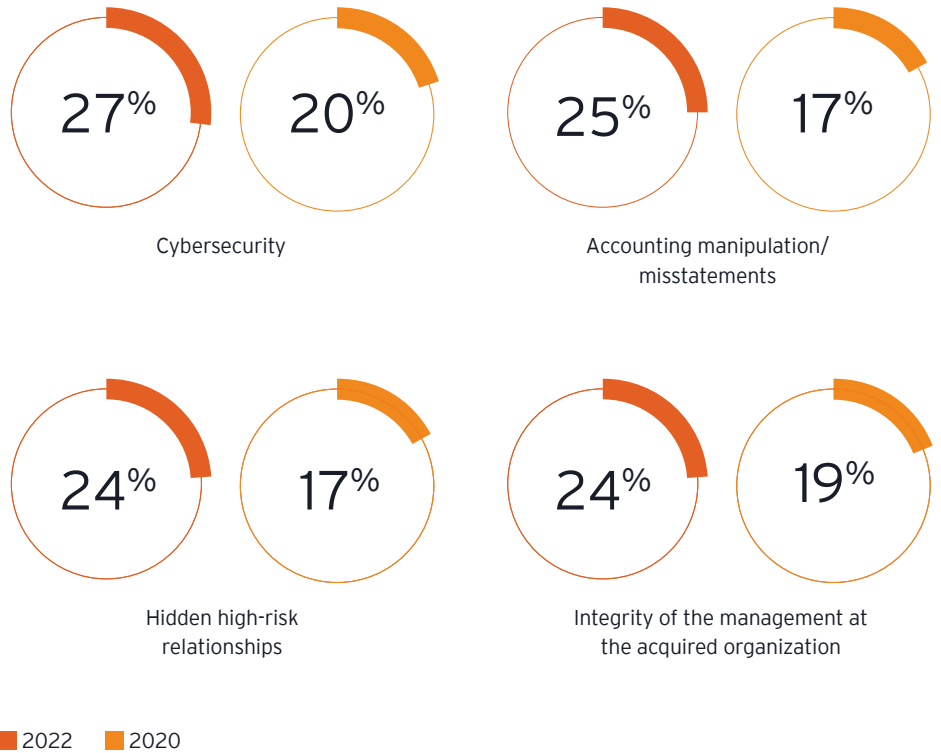
And it's not just that more and more of a company's operations, and transactions, are digital; the boundaries that border a company's operations are increasingly blurred to include third parties, suppliers, vendors and contractors.

As in 2020, overall confidence that third parties abide by relevant laws and regulations is high at 83% but, while 47% of board members show the highest level of confidence, only 28% of employees share this. There is also a revealing difference between roles. While 86% of IT departments are fairly/very confident of the integrity of their suppliers, only 71% of colleagues in the Legal departments agree (down from 86% in 2020).

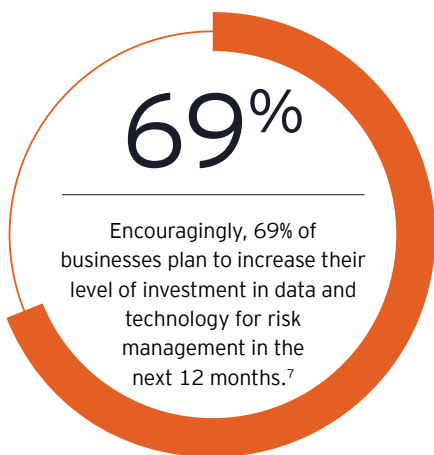
In addition, M&A activity, currently running at historic levels, also exposes the organization to significant risk. The EY Global Integrity Report 2022 shows a heightening in awareness of these risks compared with 2020. Surveyed respondents identified the following risks as being most significant when acquiring, partnering with, or investing in other organizations: cyber crime (27%), accounting misstatement (25%), hidden high-risk relationships (24%), and the integrity of management at the acquired organization (24%). Company leaders should be concerned as these heightened perceptions of risk are not being matched by heightened levels of mitigation. The Global Integrity Report 2022 results shows a decline of 6% in compliance reviews, including site visits and transactional testing, to just 32%. Background checks are also down a percentage point compared with the 2020 report.

As companies emerge from the pandemic and look to fill resource gaps with contractors, binding them into the organization's culture is vital.

Of the following risks, which three do you think are the most significant when acquiring, partnering with, or investing in, other organizations?



Base: Global Integrity Report 2022 (4,762) and Global Integrity Report 2020 (2,948)



But it is not all bad news. “Control functions have access to more data and solutions than ever before,” says Corey Dunbar, Ernst & Young LLP United States, Forensic & Integrity Services, Principal.

“Companies who leverage technology to enable risk mitigation efforts gain greater visibility, not only into their dynamic risk landscape, but also the effectiveness of their compliance program as a whole. Leaders now need to harness forensic technology solutions to identify hidden risks, use benchmarking to understand outliers, and ensure that technology is an integral part of a company's compliance strategy to make the most of these advancements.”

When presented with a series of initiatives that enhance enterprise resilience, boards identify the use of data and technology as their top priority.⁸

Increasingly sophisticated data analytics that can map human behavior and help companies identify potential risks goes well beyond checking travel and entertainment expenditure lines. Knowledge and AI can be leveraged in a more automated fashion. “Tech is the big play in advancing the Integrity Agenda,” says Dunbar, “from anonymous hotlines to regulator enforcement. There will be fewer places to hide as data increases the transparency of a company's interactions and transactions.”

^{7,8} “EY Global Board Risk 2021”, EY website, https://www.ey.com/en_gl/risk/how-can-data-and-tech-turn-risk-into-confidence, accessed 14 July 2021.

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There will be fewer places to hide as data increases the transparency of all of a company's interactions and transactions.

Corey Dunbar, Ernst & Young (US), Forensic & Integrity Services, Principal

4

Driving a sustainable future





Actions to deliver on public comments will be even more closely scrutinized as rigorous disclosure obligations on a company's ESG performance come into force.

Andrew Gordon, EY Global Forensic & Integrity Services Leader

As is spelled out in a recent memorandum from the Biden Administration, corruption presents more than a risk to the organization – it “corrodes public trust; hobbles effective governance; distorts markets and equitable access to services; undercuts development efforts; contributes to national fragility, extremism and migration; and provides authoritarian leaders a means to undermine democracies worldwide.”⁹ Good governance and transparency is essential to the trust that underpins government, the capital markets, and society.

Integrity façades, wishful thinking, and “greenwashing” (or the gap between a company's ESG statements and its actions) is increasingly ineffective in convincing employees, customers, and society of an organization's true ESG performance, as the Global Integrity Report demonstrates. Corporate reputations (and the careers of CEOs) are quickly destroyed by public disclosures of a “say-do” gap, and those reputations will be even more closely scrutinized as rigorous disclosure obligations on a company's ESG performance come into force.

Organizations can harness the momentum coming from ESG harmonization, metrics, and reporting to drive change and energize the integrity agenda. By focusing on tech-driven and data-centric ways to measure integrity culture and build the right controls, processes, and insights, companies can transform their compliance programs to create long-term value.

⁹ “The Whitehouse Briefing Room”, The Whitehouse website, <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/06/03/memorandum-on-establishing-the-fight-against-corruption-as-a-core-united-states-national-security-interest/>, accessed 5 June 2021.

Five actions

Accelerate your integrity agenda



1

Really know your business

Performing fraud and corruption risk assessments are at the heart of the journey to protect your organization. But beyond that, they need to be taken seriously from the top down, be data enabled, regularly and robustly performed with any gaps or weaknesses exposed and put right.

2

Put the human into compliance

Recognize that systems and processes don't commit fraud, humans do. The best compliance frameworks can be breached if there isn't a culture of doing the right thing, which makes building that strong integrity culture as important as the control environment.

3

Be empowered by the power of your own data

Treat the growth in data volumes as an opportunity to aid the combat of fraud, not a threat. Use your own data to detect irregular behavior and guide your response to preventing and investigating it. Look for ways of collecting data that supports your ESG journey and aligns to your integrity agenda.

4

Educate, don't train

As the report highlighted, the integrity message is slowly landing and yet appetite for malpractice is growing. Continue the journey of communicating and awareness building by moving from training to educating, so everyone understands the "why" as well as the "what" of business integrity.

5

Speak up and support whistleblowing

Give people the opportunity to report suspected wrongdoing in good faith and make them feel safe by ensuring there is protection against retaliation.

About this research

Between June and September 2021, researchers – the global market research agency Ipsos MORI – conducted 4,762 surveys in the local language with board members, senior managers, managers, and employees in a sample of the largest organizations and public bodies in 54 countries and territories worldwide.

Job title

Board director/member	442	9%
Senior management	1,287	27%
Other management	2,002	42%
Other employee	1,031	22%

Company size (employee numbers)

Less than 249 employees	23	>1%
250-499 employees	5	>1%
500-999 employees	972	20%
1,000-4,999 employees	1,749	37%
5,000-9,999 employees	810	17%
10,000 employees +	1,203	25%

Industry summary

Financial services	543	11%
Government and public sector	480	10%
Consumer products, retail and wholesale	538	11%
Technology, communications and entertainment	765	16%
Energy	225	5%
Life sciences	270	6%
Advanced manufacturing and automotive	688	14%
Real Estate	280	6%
Professional firms and services	215	5%
Other	758	16%
Total	4,762	100%

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