

Institute of Business Ethics (IBE), Corporate Ethics Policies and Programmes – March 2020

Methodology: Savanta ComRes interviewed 35 senior ethics and compliance practitioners from large, listed companies in France, Germany, Italy, Spain and the UK online between June 7th and August 8th August 2019. Data were not weighted. Savanta ComRes is a member of the British Polling Council and abides by its rules. Full tables at www.comresglobal.com

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Table 1

D2: Which of the following, if any, best describes the sector your company operates in?

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Finance & insurance	7 20%	5 22%	- -	2 67%	- -	- -
Health	4 11%	3 13%	- -	- -	- -	1 50%
Production	3 9%	2 9%	- -	- -	1 20%	- -
Information & communication	2 6%	2 9%	- -	- -	- -	- -
Retail	1 3%	1 4%	- -	- -	- -	- -
Transport & storage (inc. postal)	1 3%	- -	- -	1 33%	- -	- -
Education	1 3%	1 4%	- -	- -	- -	- -
Agriculture, forestry & fishing	- -	- -	- -	- -	- -	- -
Construction	- -	- -	- -	- -	- -	- -
Motor trades	- -	- -	- -	- -	- -	- -
Wholesale	- -	- -	- -	- -	- -	- -
Accommodation & food services	- -	- -	- -	- -	- -	- -
Property	- -	- -	- -	- -	- -	- -
Professional, scientific & technical	- -	- -	- -	- -	- -	- -

Table 1 Cont'd
 D2: Which of the following, if any, best describes the sector your company operates in?
 Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Business administration and support services	-	-	-	-	-	-
Public administration and defence	-	-	-	-	-	-
Arts, entertainment, recreation and other services	-	-	-	-	-	-
Other	16	9	1	-	4	1
	46%	39%	100%	-	80%	50%

Table 2
D3: Which of the following indexes, if any, is your company primarily listed on?
Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
FTSE100	23 66%	23 100%	- -	- -	- -	- -
CAC 40	5 14%	- -	- -	- -	5 100%	- -
MIB	3 9%	- -	- -	3 100%	- -	- -
DAX	2 6%	- -	- -	- -	- -	2 100%
IBEX 35	1 3%	- -	1 100%	- -	- -	- -
Other	1 3%	- -	- -	- -	- -	- -
Don't know	- -	- -	- -	- -	- -	- -
None of the above	- -	- -	- -	- -	- -	- -

Table 3
 D4: To the best of your knowledge, how many employees does your company have globally?
 Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
1 – 50	-	-	-	-	-	-
51 – 250	-	-	-	-	-	-
251 – 500	-	-	-	-	-	-
501 – 1,000	-	-	-	-	-	-
1001 – 10,000	4 11%	3 13%	-	-	-	-
10,001+	31 89%	20 87%	1 100%	3 100%	5 100%	2 100%
Don't know	-	-	-	-	-	-
Prefer not to say	-	-	-	-	-	-

Table 4

Q1: An ethics (or compliance) programme can be processes, a code, policies, or tools that a company may use to make sure that it operates in accordance with its values.

Does your company have an ethics programme?

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Yes	35 100%	23 100%	1 100%	3 100%	5 100%	2 100%
No	-	-	-	-	-	-
Don't know	-	-	-	-	-	-
Prefer not to say	-	-	-	-	-	-

Table 5

Q2: Which of the following, if any, would you say are the three issues you are currently most concerned about in your company?

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Data privacy and use of big data	17 49%	11 48%	1 100%	2 67%	2 40%	1 50%
Bribery and corruption	15 43%	13 57%	- -	1 33%	- -	1 50%
Discrimination, harassment or bullying	12 34%	10 43%	- -	- -	1 20%	1 50%
Speaking up/whistleblowing	11 31%	8 35%	- -	- -	3 60%	- -
Supply chain/sourcing	7 20%	3 13%	1 100%	- -	2 40%	- -
Safety and security in the workplace	6 17%	5 22%	- -	1 33%	- -	- -
Environmental responsibility	6 17%	4 17%	1 100%	- -	- -	1 50%
Responsible product development	6 17%	2 9%	- -	2 67%	1 20%	1 50%
Managing conflicts of interest	5 14%	4 17%	- -	- -	1 20%	- -
Artificial Intelligence (AI)	5 14%	1 4%	- -	- -	4 80%	- -
Human rights (including exploitative labour and modern slavery)	2 6%	2 9%	- -	- -	- -	- -
Work-home balance for employees	2 6%	- -	- -	2 67%	- -	- -
Executive remuneration policies	2 6%	1 4%	- -	- -	- -	1 50%
Responsible marketing/advertising practices	1 3%	- -	- -	- -	1 20%	- -

Table 5 Cont'd

Q2: Which of the following, if any, would you say are the three issues you are currently most concerned about in your company?

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Tax policy	-	-	-	-	-	-
	-	-	-	-	-	-
Use of social media	-	-	-	-	-	-
	-	-	-	-	-	-
Other	4	3	-	1	-	-
	11%	13%	-	33%	-	-
Don't know	-	-	-	-	-	-
	-	-	-	-	-	-
None of the above	-	-	-	-	-	-
	-	-	-	-	-	-

Table 6
 Q3: What were the last significant changes that your company made to its ethics and compliance programme?
 Base: All respondents who say their company has an ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
My company has never made changes to its ethics and compliance programme	-	-	-	-	-	-
Don't know	3	2	-	1	-	-
	9%	9%	-	33%	-	-

Table 7
Q4: Which of the following, if any, has primary responsibility for implementing your company's ethics programme?
Base: All respondents who say their company has an ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Ethics & compliance (as a joint function)	18 51%	14 61%	- -	- -	2 40%	1 50%
Ethics (as an independent function)	4 11%	1 4%	- -	- -	3 60%	- -
CSR/CR/sustainability	4 11%	1 4%	- -	2 67%	- -	1 50%
Legal	2 6%	2 9%	- -	- -	- -	- -
Corporate/external affairs	1 3%	1 4%	- -	- -	- -	- -
Human Resources (HR)	- -	- -	- -	- -	- -	- -
Internal audit/finance	- -	- -	- -	- -	- -	- -
Other	6 17%	4 17%	1 100%	1 33%	- -	- -
Don't know	- -	- -	- -	- -	- -	- -

Table 8

Q5: Which of the following, if any, does your company's ethics department report to?

Base: All respondents who say their company has an ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
CEO	11 31%	4 17%	- -	1 33%	4 80%	1 50%
General Counsel	9 26%	8 35%	1 100%	- -	- -	- -
Head of legal	6 17%	6 26%	- -	- -	- -	- -
Company secretary	- -	- -	- -	- -	- -	- -
Other	12 34%	8 35%	- -	2 67%	1 20%	1 50%
Don't know	- -	- -	- -	- -	- -	- -

Table 9

Q6: Do you have a committee who is responsible for ethics, values and culture in your organisation?

Base: All respondents who say their company has an ethics programme

	Total	Company Index					Ethics, values and culture a regular agenda item in full board meetings		
		FTSE100	IBEX 35	MIB	CAC 40	DAX	Yes	No	Don't know
Unweighted base	35	23	1	3	5	2	24	7	4
Yes, a board level committee	18 51%	13 57%	1 100%	2 67%	2 40%	- -	14 58%	2 29%	2 50%
Yes, a committee at sub-board level	11 31%	6 26%	- -	1 33%	3 60%	- -	7 29%	2 29%	2 50%
No, we do not have a committee	6 17%	4 17%	- -	- -	- -	2 100%	3 13%	3 43%	- -
Don't know	- -	- -	- -	- -	- -	- -	- -	- -	- -
NET: Yes	29 83%	19 83%	1 100%	3 100%	5 100%	- -	21 88%	4 57%	4 100%

Table 10
Q7: Is ethics, values and culture a regular agenda item in full board meetings?
Base: All respondents who say their company has an ethics programme

	Total	Company Index					Has board level committee	
		FTSE100	IBEX 35	MIB	CAC 40	DAX	Yes	No
Unweighted base	35	23	1	3	5	2	18	17
Yes	24 69%	18 78%	1 100%	1 33%	3 60%	1 50%	14 78%	10 59%
No	7 20%	3 13%	- -	1 33%	1 20%	1 50%	2 11%	5 29%
Don't know	4 11%	2 9%	- -	1 33%	1 20%	- -	2 11%	2 12%

Table 11
Q8: And how frequently are matters of ethics, values and culture discussed in full board meetings?
Base: All respondents who say that ethics, values and culture is a regular agenda item in full board team meetings

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	24	18	1	1	3	1
At least once a year	3 13%	- -	- -	- -	3 100%	- -
At least twice a year	4 17%	3 17%	- -	- -	- -	1 100%
At least once a quarter	10 42%	9 50%	- -	1 100%	- -	- -
Every board meeting	5 21%	4 22%	1 100%	- -	- -	- -
Other	- -	- -	- -	- -	- -	- -
Don't know	2 8%	2 11%	- -	- -	- -	- -

Table 12

Q9r1: Full-time - How many employees do you have dedicated to ethics in your organisation? Please exclude ethics ambassadors or individuals in equivalent positions.

Base: All respondents who say their company has an ethics programme

		Total	Company Index				
			FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base		35	23	1	3	5	2
Q9r1: Full-time - How many employees do you have dedicated to ethics in your organisation? Please exclude ethics ambassadors or individuals in equivalent positions.	0	1 3%	1 4%	- -	- -	- -	- -
	1-10	10 29%	4 17%	- -	1 33%	4 80%	- -
	11-99	8 23%	7 30%	- -	1 33%	- -	- -
	100 or more	4 11%	4 17%	- -	- -	- -	- -
	Mean	59.3	82.8		8.5	4.5	
Q9r2: Part-time - How many employees do you have dedicated to ethics in your organisation? Please exclude ethics ambassadors or individuals in equivalent positions.	0	16 46%	11 48%	- -	1 33%	3 60%	- -
	1-3	2 6%	1 4%	- -	1 33%	- -	- -
	4 or more	5 14%	4 17%	- -	- -	1 20%	- -
	Mean	11.0	9.3		0.5	26.0	
	Don't know	8 23%	6 26%	- -	- -	- -	2 100%
	Prefer not to say	4 11%	1 4%	1 100%	1 33%	1 20%	- -

Table 13
Q10: And how many ethics ambassadors (or people in similar roles) do you have at your organisation?
Base: All respondents who say their company has an ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
1 - 24	5 14%	2 9%	- -	1 33%	2 40%	- -
25 - 49	1 3%	1 4%	- -	- -	- -	- -
50 - 74	- -	- -	- -	- -	- -	- -
75 - 99	1 3%	- -	- -	- -	1 20%	- -
100 +	8 23%	6 26%	- -	- -	1 20%	1 50%
My organisation does not have any ethics ambassadors (or people in similar roles)	13 37%	10 43%	- -	1 33%	1 20%	- -
Don't know	4 11%	3 13%	- -	- -	- -	1 50%
Prefer not to say	3 9%	1 4%	1 100%	1 33%	- -	- -
NET: 25+	10 29%	7 30%	- -	- -	2 40%	1 50%
NET: 50+	9 26%	6 26%	- -	- -	2 40%	1 50%
NET: 75+	9 26%	6 26%	- -	- -	2 40%	1 50%
NET: Any	15 43%	9 39%	- -	1 33%	4 80%	1 50%

Table 14
Q11: Please outline your company's core values in the text box below. This could be a set of words or phrases which exemplify these values.
Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
My company does not have any explicit core values	-	-	-	-	-	-
	-	-	-	-	-	-
Don't know	2	1	-	1	-	-
	6%	4%	-	33%	-	-
Prefer not to say	1	1	-	-	-	-
	3%	4%	-	-	-	-

Table 15
Q12: And which of the following, if any, do you consider to be the main purposes of the code of ethics (or equivalent) at your company?
Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Creating a shared and consistent corporate culture	26 74%	18 78%	- -	2 67%	4 80%	1 50%
Providing guidance to staff	24 69%	16 70%	1 100%	1 33%	5 100%	1 50%
A public commitment to ethical standards	14 40%	11 48%	1 100%	- -	- -	1 50%
Reducing operational risk	11 31%	8 35%	- -	1 33%	1 20%	1 50%
Helping to secure long term shareholder value	10 29%	4 17%	1 100%	1 33%	3 60%	1 50%
Guarding reputation	9 26%	4 17%	- -	2 67%	1 20%	1 50%
Providing guidance to contractors and other business partners	4 11%	1 4%	- -	2 67%	1 20%	- -
Decreasing liability in case of misconduct	1 3%	1 4%	- -	- -	- -	- -
Improving the company's competitive position	1 3%	1 4%	- -	- -	- -	- -
Other	- -	- -	- -	- -	- -	- -
Don't know	- -	- -	- -	- -	- -	- -
There is not an explicit code of ethics at my company	- -	- -	- -	- -	- -	- -
None of the above	- -	- -	- -	- -	- -	- -

Table 16
 Q13: And approximately how long has your company had a code of ethics?
 Base: All respondents who have a code of ethics

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Less than 1 year	-	-	-	-	-	-
	-	-	-	-	-	-
Between 1 and 4 years	5	4	-	1	-	-
	14%	17%	-	33%	-	-
Between 5 and 9 years	9	7	1	-	1	-
	26%	30%	100%	-	20%	-
10 years or more	20	11	-	2	4	2
	57%	48%	-	67%	80%	100%
Don't know	-	-	-	-	-	-
	-	-	-	-	-	-
Prefer not to say	1	1	-	-	-	-
	3%	4%	-	-	-	-
NET: Less than 10 years	14	11	1	1	1	-
	40%	48%	100%	33%	20%	-

Table 17
Q14: Which of the following groups are required to certify their knowledge of your company's code of ethics on an annual basis?
Base: All respondents who have a code of ethics

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
The executive team	24 69%	18 78%	1 100%	1 33%	2 40%	2 100%
Managers or supervisors	24 69%	18 78%	1 100%	1 33%	2 40%	2 100%
Other employees	21 60%	16 70%	1 100%	1 33%	1 20%	2 100%
The board	20 57%	15 65%	1 100%	1 33%	1 20%	2 100%
Other	6 17%	2 9%	- -	2 67%	2 40%	- -
Don't know	1 3%	1 4%	- -	- -	- -	- -
None of these groups are required to certify their knowledge of my company's code of ethics	3 9%	1 4%	- -	- -	1 20%	- -

Table 18
Q15: Which of the following ways, if any, is your code of ethics communicated, displayed or reported on?
Base: All respondents who have a code of ethics

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Included as part of the induction for new joiners	33 94%	22 96%	1 100%	3 100%	5 100%	2 100%
Posted on the company intranet	32 91%	20 87%	1 100%	3 100%	5 100%	2 100%
Posted on the company website	30 86%	20 87%	1 100%	3 100%	4 80%	1 50%
Covered in code specific training	29 83%	22 96%	1 100%	1 33%	3 60%	2 100%
Discussed in annual reports	29 83%	21 91%	1 100%	1 33%	4 80%	2 100%
Produced as a standalone guide/booklet	28 80%	19 83%	1 100%	2 67%	5 100%	1 50%
Mentioned in manager-led team discussions	27 77%	19 83%	1 100%	1 33%	4 80%	2 100%
Discussed in the corporate responsibility report (or equivalent report)	26 74%	18 78%	1 100%	3 100%	3 60%	1 50%
Covered in supplier training	21 60%	16 70%	- -	1 33%	2 40%	2 100%
Written in contracts of employment	20 57%	15 65%	1 100%	1 33%	2 40%	- -
Discussed in an internal newsletter	18 51%	12 52%	- -	1 33%	3 60%	2 100%
Included as part of staff manual / handbook	17 49%	11 48%	1 100%	1 33%	2 40%	2 100%
Circulated on the internet or social media	17 49%	11 48%	1 100%	- -	3 60%	2 100%
Our code is publically available in another form (please specify)	4 11%	2 9%	- -	- -	1 20%	1 50%

Table 18 Cont'd

Q15: Which of the following ways, if any, is your code of ethics communicated, displayed or reported on?

Base: All respondents who have a code of ethics

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Discussed in an external newsletter	1 3%	1 4%	-	-	-	-
Other	2 6%	1 4%	-	-	1 20%	-
Don't know	-	-	-	-	-	-
None of the above	-	-	-	-	-	-

Table 19
Q16: How do you usually communicate ethics messages to employees?
Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Apps/website	28 80%	19 83%	1 100%	2 67%	4 80%	2 100%
Face-to-face	26 74%	18 78%	1 100%	1 33%	4 80%	2 100%
In the workplace (i.e. posters)	26 74%	17 74%	1 100%	1 33%	5 100%	2 100%
Video messages	23 66%	17 74%	- -	- -	4 80%	2 100%
'Town Hall' style meetings	23 66%	17 74%	- -	- -	4 80%	2 100%
In print	21 60%	12 52%	1 100%	1 33%	5 100%	2 100%
Emails	21 60%	14 61%	1 100%	1 33%	3 60%	2 100%
Company conferences	20 57%	14 61%	- -	1 33%	5 100%	- -
Other	6 17%	2 9%	1 100%	1 33%	1 20%	- -
Don't know	- -	- -	- -	- -	- -	- -
My company does not have an ethics communications strategy	1 3%	- -	- -	1 33%	- -	- -

Table 20
Q17: For each of the following groups, please select what ethics information, if any, is reported to them internally.

Base: All respondents

	Groups			
	The board	The executive team	Managers or supervisors	Other employees
Unweighted base	35	35	35	35
Ethics training completion rates	24 69%	29 83%	28 80%	14 40%
Code sign off rates	19 54%	23 66%	20 57%	6 17%
Number of disciplinary actions taken against the code	26 74%	27 77%	15 43%	7 20%
Number of speak up/whistleblowing contacts	29 83%	31 89%	20 57%	14 40%
Number of speak up/whistleblowing contacts leading to disciplinary actions	26 74%	29 83%	17 49%	9 26%
Number of suppliers/other business partners contracts terminated for ethical reasons	17 49%	21 60%	12 34%	1 3%
None of these	4 11%	2 6%	3 9%	13 37%

Table 21
Q17: For each of the following groups, please select what ethics information, if any, is reported to them internally.

The board

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Number of speak up/whistleblowing contacts	29 83%	18 78%	1 100%	3 100%	4 80%	2 100%
Number of disciplinary actions taken against the code	26 74%	16 70%	1 100%	3 100%	3 60%	2 100%
Number of speak up/whistleblowing contacts leading to disciplinary actions	26 74%	16 70%	1 100%	3 100%	3 60%	2 100%
Ethics training completion rates	24 69%	18 78%	- -	1 33%	3 60%	2 100%
Code sign off rates	19 54%	16 70%	- -	- -	2 40%	1 50%
Number of suppliers/other business partners contracts terminated for ethical reasons	17 49%	11 48%	1 100%	2 67%	- -	2 100%
None of these	4 11%	3 13%	- -	- -	1 20%	- -

Table 22
Q17: For each of the following groups, please select what ethics information, if any, is reported to them internally.

The executive team

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Number of speak up/whistleblowing contacts	31 89%	21 91%	- -	2 67%	5 100%	2 100%
Ethics training completion rates	29 83%	21 91%	- -	- -	5 100%	2 100%
Number of speak up/whistleblowing contacts leading to disciplinary actions	29 83%	20 87%	1 100%	2 67%	4 80%	1 50%
Number of disciplinary actions taken against the code	27 77%	19 83%	1 100%	1 33%	4 80%	1 50%
Code sign off rates	23 66%	18 78%	- -	- -	4 80%	1 50%
Number of suppliers/other business partners contracts terminated for ethical reasons	21 60%	15 65%	- -	1 33%	2 40%	2 100%
None of these	2 6%	1 4%	- -	1 33%	- -	- -

Table 23
Q17: For each of the following groups, please select what ethics information, if any, is reported to them internally.
Managers or supervisors
Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Ethics training completion rates	28 80%	19 83%	1 100%	2 67%	4 80%	2 100%
Code sign off rates	20 57%	15 65%	1 100%	1 33%	2 40%	1 50%
Number of speak up/whistleblowing contacts	20 57%	14 61%	- -	2 67%	3 60%	1 50%
Number of speak up/whistleblowing contacts leading to disciplinary actions	17 49%	13 57%	- -	2 67%	2 40%	- -
Number of disciplinary actions taken against the code	15 43%	11 48%	- -	2 67%	2 40%	- -
Number of suppliers/other business partners contracts terminated for ethical reasons	12 34%	9 39%	- -	2 67%	- -	1 50%
None of these	3 9%	1 4%	- -	1 33%	- -	- -

Table 24
Q17: For each of the following groups, please select what ethics information, if any, is reported to them internally.

Other employees

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Ethics training completion rates	14 40%	13 57%	- -	- -	- -	1 50%
Number of speak up/whistleblowing contacts	14 40%	9 39%	- -	1 33%	3 60%	1 50%
Number of speak up/whistleblowing contacts leading to disciplinary actions	9 26%	6 26%	- -	1 33%	2 40%	- -
Number of disciplinary actions taken against the code	7 20%	5 22%	- -	1 33%	1 20%	- -
Code sign off rates	6 17%	6 26%	- -	- -	- -	- -
Number of suppliers/other business partners contracts terminated for ethical reasons	1 3%	- -	- -	- -	- -	1 50%
None of these	13 37%	7 30%	1 100%	1 33%	2 40%	1 50%

Table 25
Q18: Does your company offer specific training on its ethics programme to each of the following groups?

Base: All respondents

	Total	Q18: Does your company offer specific training on its ethics programme to each of the following groups ?					
		NET: Yes	Yes, on a mandatory basis	Yes, on a voluntary basis	My company does not offer training for this group	Don't know	Not applicable
Other employees	35 100%	33 94%	30 86%	3 9%	-	1 3%	1 3%
Managers or supervisors	35 100%	32 91%	28 80%	4 11%	1 3%	2 6%	-
The executive team	35 100%	30 86%	28 80%	2 6%	3 9%	2 6%	-
The board	35 100%	23 66%	16 46%	7 20%	5 14%	5 14%	2 6%
Business partners	35 100%	20 57%	10 29%	10 29%	7 20%	5 14%	3 9%

Table 26
Q18: Does your company offer specific training on its ethics programme to each of the following groups?

The board

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Yes, on a mandatory basis	16 46%	14 61%	- -	- -	1 20%	1 50%
Yes, on a voluntary basis	7 20%	4 17%	- -	2 67%	1 20%	- -
My company does not offer training for this group	5 14%	2 9%	- -	1 33%	1 20%	- -
Don't know	5 14%	3 13%	- -	- -	1 20%	1 50%
Not applicable	2 6%	- -	1 100%	- -	1 20%	- -
NET: Yes	23 66%	18 78%	- -	2 67%	2 40%	1 50%

Table 27
Q18: Does your company offer specific training on its ethics programme to each of the following groups?

The executive team

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Yes, on a mandatory basis	28 80%	20 87%	1 100%	1 33%	4 80%	1 50%
Yes, on a voluntary basis	2 6%	1 4%	- -	1 33%	- -	- -
My company does not offer training for this group	3 9%	1 4%	- -	1 33%	1 20%	- -
Don't know	2 6%	1 4%	- -	- -	- -	1 50%
Not applicable	- -	- -	- -	- -	- -	- -
NET: Yes	30 86%	21 91%	1 100%	2 67%	4 80%	1 50%

Table 28
Q18: Does your company offer specific training on its ethics programme to each of the following groups?
Managers or supervisors
Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Yes, on a mandatory basis	28 80%	20 87%	1 100%	1 33%	4 80%	1 50%
Yes, on a voluntary basis	4 11%	2 9%	- -	1 33%	1 20%	- -
My company does not offer training for this group	1 3%	- -	- -	1 33%	- -	- -
Don't know	2 6%	1 4%	- -	- -	- -	1 50%
Not applicable	- -	- -	- -	- -	- -	- -
NET: Yes	32 91%	22 96%	1 100%	2 67%	5 100%	1 50%

Table 29
Q18: Does your company offer specific training on its ethics programme to each of the following groups?

Other employees

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Yes, on a mandatory basis	30 86%	21 91%	1 100%	2 67%	4 80%	1 50%
Yes, on a voluntary basis	3 9%	1 4%	- -	1 33%	- -	1 50%
My company does not offer training for this group	- -	- -	- -	- -	- -	- -
Don't know	1 3%	1 4%	- -	- -	- -	- -
Not applicable	1 3%	- -	- -	- -	1 20%	- -
NET: Yes	33 94%	22 96%	1 100%	3 100%	4 80%	2 100%

Table 30
Q18: Does your company offer specific training on its ethics programme to each of the following groups?

Business partners

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Yes, on a mandatory basis	10 29%	8 35%	- -	1 33%	1 20%	- -
Yes, on a voluntary basis	10 29%	7 30%	- -	- -	1 20%	1 50%
My company does not offer training for this group	7 20%	3 13%	- -	2 67%	2 40%	- -
Don't know	5 14%	4 17%	- -	- -	- -	1 50%
Not applicable	3 9%	1 4%	1 100%	- -	1 20%	- -
NET: Yes	20 57%	15 65%	- -	1 33%	2 40%	1 50%

Table 31
Q19: Which of the following groups, if any, receive training on your ethics programme as a part of their induction?
Base: All respondents who say that at least one group receive training on their company's ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	34	22	1	3	5	2
Other employees	31 91%	22 100%	1 100%	1 33%	4 80%	2 100%
Managers or supervisors	28 82%	20 91%	1 100%	1 33%	4 80%	1 50%
The executive team	24 71%	18 82%	-	1 33%	4 80%	1 50%
The board	18 53%	14 64%	-	2 67%	1 20%	1 50%
Business partners	9 26%	9 41%	-	-	-	-
Don't know	-	-	-	-	-	-
None of the above	1 3%	-	-	1 33%	-	-

Table 32
 Q20: Other than at induction, how often is training on your ethics programme delivered to each of the following groups?
 Base: All respondents who say that at least one group receive training on their company's ethics programme

	Total	Q20: Other than at induction, how often is training on your ethics programme delivered to each of the following groups?						
		More than once a year	Annually	Less than once a year	On an ad-hoc basis (when a specific issue arises)	Once only (at a time other than induction)	Never	Don't know
The board	23 100%	1 4%	14 61%	1 4%	5 22%	-	-	2 9%
The executive team	30 100%	4 13%	18 60%	2 7%	4 13%	-	1 3%	1 3%
Managers or supervisors	32 100%	4 13%	20 63%	2 6%	4 13%	2 6%	-	-
Other employees	33 100%	4 12%	21 64%	2 6%	3 9%	3 9%	-	-
Business partners	20 100%	-	4 20%	3 15%	9 45%	1 5%	-	3 15%

Table 33
Q20: Other than at induction, how often is training on your ethics programme delivered to each of the following groups?
The board

Base: All respondents who say this group receives training on the company's ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	23	18		2	2	1
More than once a year	1 4%	1 6%	- -	- -	- -	- -
Annually	14 61%	13 72%	- -	- -	1 50%	- -
Less than once a year	1 4%	1 6%	- -	- -	- -	- -
On an ad-hoc basis (when a specific issue arises)	5 22%	2 11%	- -	2 100%	1 50%	- -
Once only (at a time other than induction)	- -	- -	- -	- -	- -	- -
Never	- -	- -	- -	- -	- -	- -
Don't know	2 9%	1 6%	- -	- -	- -	1 100%

Table 34
Q20: Other than at induction, how often is training on your ethics programme delivered to each of the following groups?
The executive team

Base: All respondents who say this group receives training on the company's ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	30	21	1	2	4	1
More than once a year	4 13%	3 14%	- -	- -	- -	1 100%
Annually	18 60%	16 76%	- -	- -	2 50%	- -
Less than once a year	2 7%	1 5%	- -	- -	1 25%	- -
On an ad-hoc basis (when a specific issue arises)	4 13%	1 5%	- -	2 100%	1 25%	- -
Once only (at a time other than induction)	- -	- -	- -	- -	- -	- -
Never	1 3%	- -	- -	- -	- -	- -
Don't know	1 3%	- -	1 100%	- -	- -	- -

Table 35
Q20: Other than at induction, how often is training on your ethics programme delivered to each of the following groups?
Managers or supervisors

Base: All respondents who say this group receives training on the company's ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	32	22	1	2	5	1
More than once a year	4 13%	3 14%	- -	- -	- -	1 100%
Annually	20 63%	17 77%	1 100%	- -	2 40%	- -
Less than once a year	2 6%	1 5%	- -	- -	1 20%	- -
On an ad-hoc basis (when a specific issue arises)	4 13%	1 5%	- -	2 100%	1 20%	- -
Once only (at a time other than induction)	2 6%	- -	- -	- -	1 20%	- -
Never	- -	- -	- -	- -	- -	- -
Don't know	- -	- -	- -	- -	- -	- -

Table 36
Q20: Other than at induction, how often is training on your ethics programme delivered to each of the following groups?
Other employees

Base: All respondents who say this group receives training on the company's ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	33	22	1	3	4	2
More than once a year	4 12%	3 14%	- -	- -	- -	1 50%
Annually	21 64%	17 77%	1 100%	- -	2 50%	1 50%
Less than once a year	2 6%	1 5%	- -	- -	1 25%	- -
On an ad-hoc basis (when a specific issue arises)	3 9%	1 5%	- -	2 67%	- -	- -
Once only (at a time other than induction)	3 9%	- -	- -	1 33%	1 25%	- -
Never	- -	- -	- -	- -	- -	- -
Don't know	- -	- -	- -	- -	- -	- -

Table 37
Q20: Other than at induction, how often is training on your ethics programme delivered to each of the following groups?
Business partners
Base: All respondents who say this group receives training on the company's ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	20	15		1	2	1
More than once a year	-	-	-	-	-	-
Annually	4 20%	4 27%	-	-	-	-
Less than once a year	3 15%	2 13%	-	-	1 50%	-
On an ad-hoc basis (when a specific issue arises)	9 45%	6 40%	-	1 100%	1 50%	-
Once only (at a time other than induction)	1 5%	1 7%	-	-	-	-
Never	-	-	-	-	-	-
Don't know	3 15%	2 13%	-	-	-	1 100%

Table 38
Q21: Which of the following best describes the format of the majority of your company's ethics training?
Base: All respondents who say that at least one group receive training on their company's ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	34	22	1	3	5	2
Online	16 47%	11 50%	1 100%	1 33%	2 40%	- -
Both face-to-face and online	16 47%	10 45%	- -	1 33%	3 60%	2 100%
Face-to-face	2 6%	1 5%	- -	1 33%	- -	- -
Other	- -	- -	- -	- -	- -	- -
None of the above	- -	- -	- -	- -	- -	- -

Table 39
Q22: And which of the following methods are used to deliver this ethics training?
Base: All respondents who say that at least one group receive training on their company's ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	34	22	1	3	5	2
Dilemmas / scenarios	27 79%	18 82%	- -	1 33%	5 100%	2 100%
Multimedia (e.g. videos)	27 79%	17 77%	1 100%	1 33%	5 100%	2 100%
Games	8 24%	6 27%	- -	- -	- -	2 100%
Apps	8 24%	4 18%	- -	1 33%	2 40%	1 50%
Actors	4 12%	2 9%	- -	- -	1 20%	1 50%
Other	3 9%	2 9%	1 100%	- -	- -	- -
Don't know	- -	- -	- -	- -	- -	- -
None of the above	3 9%	1 5%	- -	2 67%	- -	- -

Table 40

Q23: Which of the following, if any, does your company use in a formal process to allow employees or non-employees to raise ethical concerns or ask questions confidentially?

Base: All respondents

	Group	
	Employee s	Non- employee s
Unweighted base	35	35
Email	32 91%	29 83%
Over the phone	27 77%	25 71%
Externally managed 'speak up' system	26 74%	24 69%
In person	26 74%	18 51%
Through a website	23 66%	18 51%
Internally managed 'speak up' system	9 26%	4 11%
App	5 14%	3 9%
Other	5 14%	5 14%
Don't know	- -	1 3%
My company does not have a formal process or mechanism for this group to raise ethical concerns or ask questions confidentially	- -	1 3%

Table 41
Q23: Which of the following, if any, does your company use in a formal process to allow employees or non-employees to raise ethical concerns or ask questions confidentially?
Employees
Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Email	32 91%	21 91%	1 100%	3 100%	4 80%	2 100%
Over the phone	27 77%	21 91%	- -	- -	4 80%	2 100%
In person	26 74%	21 91%	- -	- -	4 80%	1 50%
Externally managed 'speak up' system	26 74%	21 91%	- -	- -	4 80%	1 50%
Through a website	23 66%	17 74%	1 100%	- -	3 60%	1 50%
Internally managed 'speak up' system	9 26%	4 17%	1 100%	- -	3 60%	1 50%
App	5 14%	4 17%	- -	- -	1 20%	- -
Other	5 14%	1 4%	- -	2 67%	- -	1 50%
Don't know	- -	- -	- -	- -	- -	- -
My company does not have a formal process or mechanism for this group to raise ethical concerns or ask	- -	- -	- -	- -	- -	- -

Table 42

Q23: Which of the following, if any, does your company use in a formal process to allow employees or non-employees to raise ethical concerns or ask questions confidentially?

Non-employees

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Email	29 83%	19 83%	1 100%	3 100%	3 60%	2 100%
Over the phone	25 71%	19 83%	- -	- -	4 80%	2 100%
Externally managed 'speak up' system	24 69%	19 83%	- -	- -	4 80%	1 50%
In person	18 51%	14 61%	- -	- -	3 60%	1 50%
Through a website	18 51%	14 61%	- -	- -	3 60%	1 50%
Internally managed 'speak up' system	4 11%	3 13%	- -	- -	1 20%	- -
App	3 9%	3 13%	- -	- -	- -	- -
Other	5 14%	1 4%	- -	2 67%	- -	1 50%
Don't know	1 3%	1 4%	- -	- -	- -	- -
My company does not have a formal process or mechanism for this group to raise ethical concerns or ask	1 3%	1 4%	- -	- -	- -	- -

Table 43

Q24: Does your company's ethics system or process allow for concerns to be raised anonymously?

Base: All respondents whose company has a formal ethics concerns process

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Yes	34 97%	23 100%	1 100%	2 67%	5 100%	2 100%
No	1 3%	-	-	1 33%	-	-
Don't know	-	-	-	-	-	-
Prefer not to say	-	-	-	-	-	-

Table 44

Q25: What, if anything, has your company used to ensure non-retaliation against those who have raised ethics concerns?

Base: All respondents whose company has a formal ethics concerns process

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
We do not have a non-retaliation policy	-	-	-	-	-	-
	-	-	-	-	-	-
Don't know	3	3	-	-	-	-
	9%	13%	-	-	-	-
Prefer not to say	3	2	-	-	-	1
	9%	9%	-	-	-	50%

Table 45
Q26: How do you monitor how effectively your company values and ethics are embedded throughout the organisation?
Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Use of 'speak up' data	27 77%	21 91%	- -	- -	5 100%	1 50%
Percentage of employees receiving ethics training	27 77%	18 78%	1 100%	1 33%	5 100%	1 50%
Internal audit	26 74%	17 74%	1 100%	2 67%	5 100%	1 50%
Questions on ethical standards in staff surveys	25 71%	18 78%	- -	1 33%	5 100%	1 50%
Risk assessment	24 69%	16 70%	1 100%	1 33%	5 100%	1 50%
Board reports	23 66%	17 74%	1 100%	- -	4 80%	1 50%
Dismissals due to misconduct	23 66%	15 65%	1 100%	1 33%	5 100%	- -
Code sign off numbers	14 40%	11 48%	1 100%	- -	2 40%	- -
Dedicated ethics surveys	12 34%	8 35%	- -	1 33%	3 60%	- -
Engagement with external stakeholders	11 31%	7 30%	- -	1 33%	2 40%	1 50%
External audit processes	10 29%	6 26%	- -	- -	3 60%	- -
Other	3 9%	2 9%	- -	- -	1 20%	- -
My company does not monitor the extent to which values and ethics are embedded throughout the organisation	2 6%	1 4%	- -	1 33%	- -	- -
Don't know	1 3%	- -	- -	- -	- -	1 50%

Table 46
Q27: And how frequently does your company conduct an ethics risk assessment?
Base: All respondents whose company monitors the effectiveness of their ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	32	22	1	2	5	1
More than once a year	2 6%	2 9%	- -	- -	- -	- -
Annually	14 44%	8 36%	1 100%	1 50%	3 60%	1 100%
Less than once a year	2 6%	1 5%	- -	- -	1 20%	- -
As often as required	5 16%	3 14%	- -	- -	1 20%	- -
Once only (on induction)	- -	- -	- -	- -	- -	- -
Once only (at another time)	- -	- -	- -	- -	- -	- -
Never	5 16%	4 18%	- -	1 50%	- -	- -
Other	2 6%	2 9%	- -	- -	- -	- -
Don't know	2 6%	2 9%	- -	- -	- -	- -

Table 47
Q28: What are the Key Performance Indicators (KPI) for your company's ethics programme?
Base: All respondents whose company monitors the effectiveness of their ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	32	22	1	2	5	1
Training completion rate	27 84%	19 86%	1 100%	- -	5 100%	1 100%
Number of breaches to the code of ethics	20 63%	13 59%	- -	2 100%	5 100%	- -
Employee satisfaction	18 56%	12 55%	1 100%	- -	4 80%	1 100%
Code certification	16 50%	11 50%	1 100%	1 50%	3 60%	- -
Usage of online registers (e.g. gifts and entertainment/conflict of interest)	15 47%	12 55%	1 100%	- -	2 40%	- -
Case closure days	14 44%	11 50%	- -	1 50%	2 40%	- -
Customer satisfaction	7 22%	5 23%	- -	2 100%	- -	- -
Average number of days needed to acknowledge a report received	5 16%	3 14%	- -	- -	2 40%	- -
Other	4 13%	4 18%	- -	- -	- -	- -
We do not have any KPIs for our ethics programme	2 6%	2 9%	- -	- -	- -	- -

Table 48
Q29: Which of the following, if any, do you use as external benchmarks or standards for your company's ethical performance?
Base: All respondents whose company monitors the effectiveness of their ethics programme

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	32	22	1	2	5	1
Dow Jones Sustainability Index (DJSI)	19 59%	12 55%	1 100%	1 50%	4 80%	1 100%
UN Global Compact	16 50%	7 32%	1 100%	2 100%	4 80%	1 100%
FTSE4GoodIndex	11 34%	6 27%	1 100%	2 100%	1 20%	1 100%
Great Place to Work	7 22%	6 27%	- -	- -	- -	1 100%
Ethisphere World's Most Ethical Companies	5 16%	2 9%	- -	- -	2 40%	1 100%
BS 10500 or ISO 37001 (anti-bribery standards)	4 13%	4 18%	- -	- -	- -	- -
Good Corporation Standard	3 9%	1 5%	- -	- -	2 40%	- -
FTSE ESG Index	3 9%	2 9%	- -	- -	- -	1 100%
AA1000 (accountability standard)	3 9%	2 9%	1 100%	- -	- -	- -
ISO 26000 (social responsibility standard)	2 6%	2 9%	- -	- -	- -	- -
Other	8 25%	6 27%	- -	1 50%	- -	- -
My company does not use external assurances for the effectiveness of its ethics performance	3 9%	3 14%	- -	- -	- -	- -

Table 49
 Q30: Does ethics play a part in your company's recruitment process?
 Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Yes	24 69%	16 70%	- -	2 67%	4 80%	2 100%
No	4 11%	1 4%	- -	1 33%	1 20%	- -
Don't know	6 17%	6 26%	- -	- -	- -	- -
Prefer not to say	1 3%	- -	1 100%	- -	- -	- -

Table 50

Q31: For each of the following groups, please indicate whether or not your company performance appraisals include references to ethical behaviour.

Base: All answering

	Total	Q31: For each of the following groups, please indicate whether or not your company performance appraisals include references to ethical behaviour.			
		Yes	No	Don't know	Not applicable
The executive team	34 100%	22 65%	6 18%	4 12%	2 6%
Managers or supervisors	34 100%	22 65%	8 24%	2 6%	2 6%
Other employees	34 100%	19 56%	10 29%	2 6%	3 9%
Business partners	34 100%	14 41%	9 26%	6 18%	5 15%
The board	34 100%	8 24%	8 24%	14 41%	4 12%

Table 51

Q31: For each of the following groups, please indicate whether or not your company performance appraisals include references to ethical behaviour.

The board

Base: All answering

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	34	23	1	3	5	1
Yes	8 24%	7 30%	- -	- -	- -	1 100%
No	8 24%	4 17%	- -	2 67%	2 40%	- -
Don't know	14 41%	10 43%	- -	1 33%	2 40%	- -
Not applicable	4 12%	2 9%	1 100%	- -	1 20%	- -

Table 52

Q31: For each of the following groups, please indicate whether or not your company performance appraisals include references to ethical behaviour.

The executive team

Base: All answering

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	34	23	1	3	5	1
Yes	22 65%	17 74%	- -	1 33%	3 60%	1 100%
No	6 18%	3 13%	- -	1 33%	2 40%	- -
Don't know	4 12%	2 9%	- -	1 33%	- -	- -
Not applicable	2 6%	1 4%	1 100%	- -	- -	- -

Table 53

Q31: For each of the following groups, please indicate whether or not your company performance appraisals include references to ethical behaviour.

Managers or supervisors

Base: All answering

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	34	23	1	3	5	1
Yes	22 65%	17 74%	- -	1 33%	3 60%	1 100%
No	8 24%	4 17%	- -	1 33%	2 40%	- -
Don't know	2 6%	1 4%	- -	1 33%	- -	- -
Not applicable	2 6%	1 4%	1 100%	- -	- -	- -

Table 54

Q31: For each of the following groups, please indicate whether or not your company performance appraisals include references to ethical behaviour.

Other employees

Base: All answering

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	34	23	1	3	5	1
Yes	19 56%	15 65%	- -	1 33%	2 40%	1 100%
No	10 29%	6 26%	- -	1 33%	2 40%	- -
Don't know	2 6%	1 4%	- -	1 33%	- -	- -
Not applicable	3 9%	1 4%	1 100%	- -	1 20%	- -

Table 55

Q31: For each of the following groups, please indicate whether or not your company performance appraisals include references to ethical behaviour.

Business partners

Base: All answering

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	34	23	1	3	5	1
Yes	14 41%	11 48%	- -	- -	2 40%	- -
No	9 26%	4 17%	- -	2 67%	2 40%	1 100%
Don't know	6 18%	5 22%	- -	1 33%	- -	- -
Not applicable	5 15%	3 13%	1 100%	- -	1 20%	- -

Table 56

Q32: Approximately, how many employees have been dismissed as a result of breaching your company's code of ethics in the last three years?

Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
0	3 9%	-	-	2 67%	-	-
1	1 3%	-	-	1 33%	-	-
30	1 3%	-	-	-	1 20%	-
35	1 3%	-	-	-	1 20%	-
100	1 3%	1 4%	-	-	-	-
250	1 3%	1 4%	-	-	-	-
650	1 3%	1 4%	-	-	-	-
NET: Any	6 17%	3 13%	-	1 33%	2 40%	-
Mean	118.4	333.3		0.3	32.5	
Don't know	14 40%	11 48%	1 100%	-	2 40%	-
Prefer not to say	12 34%	9 39%	-	-	1 20%	2 100%

Table 57
Q33: Which of the following groups, if any, do you ask to adhere to the standards of your ethical code or processes?
Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Suppliers	34 97%	22 96%	1 100%	3 100%	5 100%	2 100%
Joint ventures	29 83%	19 83%	1 100%	2 67%	5 100%	2 100%
Business partners	27 77%	17 74%	1 100%	3 100%	5 100%	1 50%
Non-operated / controlled joint ventures	19 54%	13 57%	- -	2 67%	3 60%	1 50%
Other	1 3%	- -	1 100%	- -	- -	- -
Don't know	- -	- -	- -	- -	- -	- -
None of the above	- -	- -	- -	- -	- -	- -

Table 58
 Q34: Does your company have a dedicated ethics code for suppliers?
 Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Yes	25 71%	17 74%	1 100%	- -	4 80%	2 100%
No	7 20%	3 13%	- -	3 100%	1 20%	- -
Don't know	3 9%	3 13%	- -	- -	- -	- -
Prefer not to say	- -	- -	- -	- -	- -	- -

Table 59
 Q35: And do you undertake due diligence for suppliers and other business partners for ethical standards?
 Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Yes	33 94%	23 100%	- -	2 67%	5 100%	2 100%
No	1 3%	- -	- -	1 33%	- -	- -
Don't know	- -	- -	- -	- -	- -	- -
Prefer not to say	1 3%	- -	1 100%	- -	- -	- -

Table 60
Q36: And which of the following pieces of information about your company's ethics, if any, are publicly available?
Base: All respondents

	Total	Company Index				
		FTSE100	IBEX 35	MIB	CAC 40	DAX
Unweighted base	35	23	1	3	5	2
Number of 'speak up' or whistleblowing contacts	15 43%	11 48%	1 100%	1 33%	1 20%	1 50%
Number of disciplinary actions taken against the code	9 26%	7 30%	- -	1 33%	1 20%	- -
Number of 'speak up' or whistleblowing contacts leading to disciplinary actions	6 17%	3 13%	1 100%	1 33%	1 20%	- -
Number of supplier or other business contracts terminated on ethical grounds	1 3%	- -	- -	- -	- -	1 50%
Other	3 9%	2 9%	- -	1 33%	- -	- -
None of the above	16 46%	10 43%	- -	- -	4 80%	1 50%