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Integrity Provides Unique Insight Into Global Compliance Concerns

2009 Global Integrity Survey Results Highlight Growing Concern Regarding Fraud & Bribery

WALTHAM, Mass., September 9, 2009 – Integrity, www.i2c.com the leading global provider of technology-powered, data-driven ethics and compliance services, today announced the results of its 2009 Global Integrity Survey. Integrity partnered with Compliance Week and surveyed executives at global public companies and large private entities with more than \$5 billion in revenue and more than 10,000 employees. Survey results concluded, fraud and bribery – from an employee to a customer, from a third-party agent to a government official, as well as any other type of improper consideration – are the biggest worries for compliance officers.

The overall theme was concern about fraud, bribery, and improper payments, especially by employees who work at remote locations and believe they can disregard rules for ethical conduct set by corporate headquarters. In addition, third-party agents acting on behalf of the company (distributors, resellers, joint venture partners, and so forth) continue to be a source of concern. Most respondents said they now communicate their business standards to third parties and include a right-to-audit clause in contracts with outsiders.

“The survey showed that just over 10 percent of companies have no third-party programs in place,” said Tom Anderson, president and CEO. “Under The Foreign Corrupt Practice Act, companies are routinely being charged with misconduct committed by third parties acting under the company’s name.”

Scott McLester, general counsel at Wyndham Worldwide Corp., expressed the usual fears about policing improper payments. “The obstacles are significant, including the fact that non-U.S. based employees might have unique cultural practices that can be at odds with U.S. law. Moreover, it can be more difficult to perform the necessary due diligence on third-party vendors (and their suppliers) as companies expand their reach into new markets.”

The survey revealed that corporations clearly understand the need for, and the importance of, an “integrity function” and compliance with the ethical standards that function dictates. That does not mean many universal best practices exist – and too often, companies seem afraid to do a hard analysis of their workforce’s ethical behavior, or to translate the data they do have into policies that would put real force into the drive for ethical conduct.

“Several forward-thinking general counsels and chief compliance officers have already begun mitigating the “next big risk” and have focused their resources on extending ethics and compliance initiatives to reach outside the company to partners, suppliers, and distributors,” said Anderson. “We see this program expansion as a natural reaction to the risk created by affiliates who have not traditionally been a part of compliance mandates. This emerging trend will likely play a large part in future Global Integrity Surveys.”

To download the complete 2009 Global Integrity Survey at no cost, please go to <http://www.i2c.com/survey/register.htm>.
About Compliance Week

Compliance Week, published by Haymarket Media, Inc., is an information service on corporate governance, risk and compliance that features a weekly electronic newsletter, a monthly print magazine, proprietary databases, industry-leading events, and a variety of interactive features and forums. Founded in 2002, Compliance Week has quickly become one of the most important go-to resources for public companies; Compliance Week now reaches more than 26,000 financial, legal, audit, risk and compliance executives. Compliance Week is located in Boston, Mass., with correspondents and columnists in Washington, D.C., Chicago, London, Brussels, Hong Kong, and elsewhere throughout the world.

About Integrity

Integrity is a technology-powered, data-driven company that helps global corporations measure, manage, and mitigate the risk of compliance failures and attention-grabbing scandals. Integrity combines proprietary technology, content, data, and professional services to keep companies out of headlines, boards out of spotlights, executives out of cross-hairs, and employees out of trouble. Our comprehensive compliance risk management offerings include: Strategy & Assessment; Training & Communications; and Measurement & Reporting. We put senior executives and in-house professionals in charge and in control of compliance risks, and give them the support they need to move business conduct standards from “aspirational” to operational. Integrity works with hundreds of the world’s great companies, and serves millions of employees on six continents. For more information about Integrity, please visit www.i2c.com.