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NEW INTEGRITY STUDY REVEALS BRIBERY AS THE NUMBER ONE RISK CONCERN OF GLOBAL COMPANIES FOR 2009

Supply chain integrity, economic downturn drive fundamental shift of concerns for 2009

Waltham, MA – December 22, 2008 – Integrity Interactive® Corporation, a company that helps leading global corporations manage and reduce the risk of compliance failures, today announced the results of the 2009 version of its annual study on the Top 12 corporate compliance concerns expressed by global companies. Integrity's new study reveals an international shift from inward-facing compliance concerns such as Financial Integrity to outward-focused concerns such as Anti-Bribery Requirements, the leading concern on this year's list. Greater focus on outward-facing compliance concerns is occurring as companies address how their actions impact the world in addition to focusing on preventing harm to themselves. This changing focus resulted in Conflicts of Interests & Gifts and Product Safety & Liability jumping towards the top of this year's list.

Recent headline-grabbing bribery cases involving politicians in Massachusetts and Alaska, major industrial conglomerates in Europe, and now the spectacular bribery charges against Illinois Governor Rod Blagojevich, illustrate that the concerns of global organizations reflected in the 2009 Top 12 list are accurately placed. It also demonstrates that global businesses are ahead of the curve and taking action.

Increased demand for supply chain integrity also shaped this year's Top 12 and drove business awareness of the potential ethics, compliance, and corporate social responsibility risks faced from misconduct in a supply chain. Concern over new supply chain regulations, negative media exposure from potential supply chain scandals and conduct of business partners played a role in pushing Anti-Bribery Requirements (number one), Conflicts of Interest & Gifts (number two) and Product Safety & Liability (number six) to the top half of this year's list.

“The spate of recent bribery and corruption cases involving prominent government officials shows that this same level of rigor is missing in the public sector. Ethics and compliance efforts in government remain weak,” said Integrity CEO David Curran. “Drastic changes in our global economy and recognition of the importance of supply chain integrity have companies demonstrating a renewed commitment to the basic principles of corporate ethics and compliance. Integrity's new Top 12 research shows that companies across industry sectors and global regions are taking steps to ensure transparency, ethical behavior and quality controls.”

The Leading Corporate Ethics and Compliance Concerns for 2009

- **Anti-Bribery Requirements:** The top compliance concern of major corporations today, understanding Anti-Bribery requirements helps companies avoid the difficulties of organizations under investigation for charges relating to official corruption.
- **Conflicts of Interests & Gifts:** Employers are concerned their employees know how to avoid conflicts of interest with suppliers, vendors, and customers.
- **Antitrust Contact with Competitors:** Global companies recognize the importance of educating executives, frequently those in sales and marketing, about not engaging in practices that could reduce competition or consumer choice.

Healthcare and Consumer Discretionary were among the leading industries addressing outward-focused ethics and compliance risks through organized compliance & ethics risk reduction programs. Product Safety & Liability was the greatest concern of Consumer Discretionary companies, while Conflicts of Interest & Gifts was most important in the Healthcare industry.

Inward-focused compliance concerns addressing the protection of corporate assets and reputation dropped to the bottom of this year's list. These concerns include: Careful Communications, Information Security and Financial Integrity which rank 10th, 11th, and 12th, respectively on the 2009 list. Financial Integrity experienced the most significant drop, falling from 7th place in 2008 to 12th in 2009. This is likely the result of an increased focus on the potential damage to outside stakeholders, for instance, vendors in the supply chain.

An interesting geographical trend was revealed in the 2009 study. Integrity observed a different global emphasis on two of the most important concerns, Conflicts of Interest & Gifts and Product Safety & Liability. North America showed greater emphasis on Conflicts of Interest & Gifts (number four), while Europe was more concerned with Product Safety & Liability. Both regions ranked Anti-Bribery Requirements as the top concern for 2009.

The Full 2009 Top 12 Corporate Ethics and Compliance Concerns

1. Anti-Bribery Requirements
2. Conflicts of Interest & Gifts
3. Antitrust Contact with Competitors
4. Mutual Respect
5. Records Management
6. Product Safety & Liability
7. Privacy
8. Proper Use of Computers
9. Export Controls
10. Careful Communication
11. Information Security
12. Financial Integrity

The complete version of Integrity's *2009 Corporate Ethics & Compliance Study* is available for no charge by emailing mwallwork@i2c.com. This full-text version of the report includes: a complete listing of

the Top 12 compliance-training courses for 2009 for all companies surveyed; Top 12 lists for very large, large, and mid-sized companies; Top 5 Concerns by Industry; and insight into emerging compliance risk-management trends and developments.

Methodology

Integrity analyzed the course-completion records of more than three million employees at over 300 companies worldwide who have taken Integrity's online compliance training since January, 2000. Companies surveyed operate globally and fall into three size categories: mid-sized (1,000 to 10,000 employees); large (10,000 to 90,000 employees); and very large (more than 90,000 employees).

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.

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