EMEA & APAC Edition

NAVEX GLOBAL®
The Ethics and Compliance Experts

# 2017 EMEA & APAC Ethics & Compliance Whistleblowing Hotline & Incident Management Benchmark Report

Benchmark Your Programme Against the World's Largest Ethics & Compliance Hotline and Incident Management Database—and Enhance Your Programme Effectiveness

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# INTRODUCTION

Good analysis and benchmarking of hotline data helps organisations answer crucial questions about their ethics and compliance programme, including:

‣ Does our culture support employees who raise concerns?

‣ Are our communications with employees reaching the intended audiences and having the desired effect?

‣ Are our investigations thorough and effective?

‣ Do we need more training?

‣ Do we need to review or update our policies?

‣ Do employees know about our reporting channels?

Comparing internal data year over year to help answer these questions is important. But getting a broader perspective on how your performance matches up to industry norms is critical.

To help, each year NAVEX Global takes anonymised data collected through our hotline and incident management systems to create these reports. This particular report is the second NAVEX Global benchmark report we have published that focuses specifically on the status of ethics and compliance hotline services in the EMEA and APAC regions. This benchmark only takes reporting data from organisations that has

its data warehoused in Europe—a subset of the data used in our global hotline report.

Because we have the world's largest and most comprehensive database of reports and recorded outcomes, ethics and compliance professionals can trust our benchmarks to help guide decision making and better understand how their programmes stack up against broader benchmarks.

For each benchmark provided in this report, you will find:

‣ A description of the benchmark

‣ Instructions on how to calculate the benchmark

‣ The 2014, 2015 and 2016 combined data for all industries in the NAVEX Global EMEA and APAC database

‣ Key findings and recommendations

This annual report is an excellent starting point for organisations committed to benchmarking and improving programme effectiveness. To leverage more advanced benchmarks, NAVEX Global offers custom benchmarking options as part of our Integrity Diagnostics™ report services. You can work with us to get apples-to-apples benchmarking based on industry, size or other facets of your organisation. Learn more about this service on our website.

## TRUST NAVEX GLOBAL'S ETHICS & COMPLIANCE SOLUTIONS

NAVEX Global's comprehensive suite of ethics and compliance software, content and services helps organisations protect their people, reputation and bottom line. Trusted by 95 of the FORTUNE 100 and more than 12,500 clients, our solutions are informed by the largest ethics and compliance community in the world.
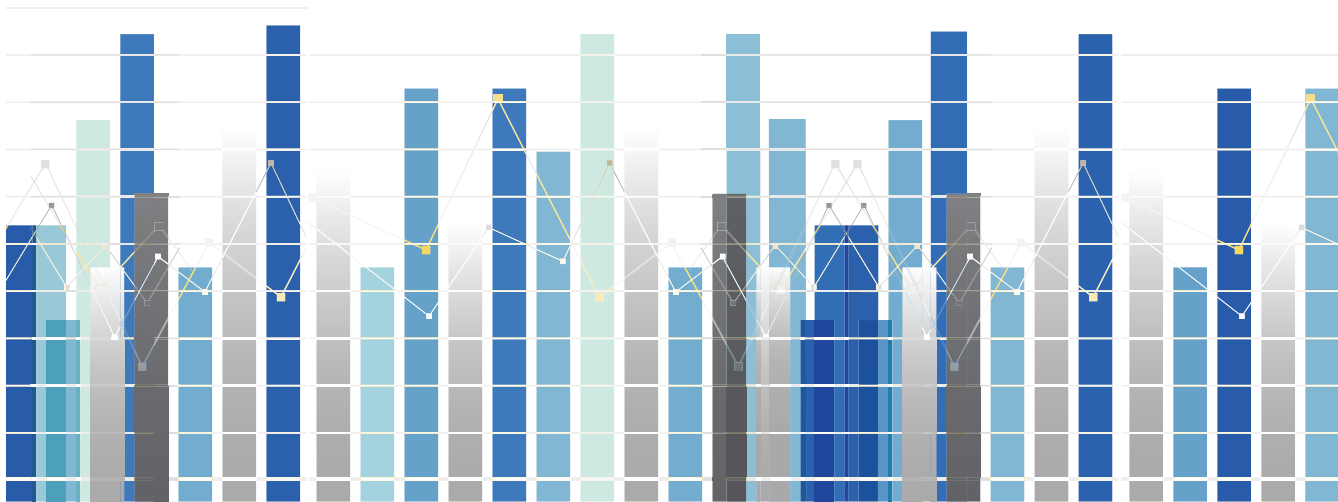
# HOW WE CALCULATE OUR BENCHMARKS

This report is specific to benchmarking organisations in EMEA and APAC. The data was collected and analysed in accordance with applicable data protection laws. All information gathered was anonymised and aggregated without the need to access any personal information contained within the data.

For statistical accuracy, our analysis includes only those organisations that received 10 or more reports in 2016. The resulting database includes a total of 13,878 individual reports, representing 98 percent of our total EMEA and APAC report database in 2016.

To remove the impact of outliers that might skew the overall reporting data, we carefully calculated benchmarks for each organisation and then identified the median (midpoint) across the total

population. This reporting methodology allows us to create a clearer picture of what is actually happening in our clients' organisations as well as to provide you with benchmarking data that is not skewed by organisation size.

That said, there are no "right" metrics in hotline benchmarking data. Where appropriate in this report, we provide what we consider to be a healthy range of results to provide context for your own data. Falling within the "normal" range indicates an organisation is on par with medians for the organisations within our database. Falling outside the normal range is a good prompt to take a closer look at whether there is an issue that needs more attention at your organisation.

# STARTS WITH THE WORLD'S LARGEST DATABASE OF REPORTS

NAVEX GLOBAL CLIENTS IN EMEA & APAC THAT USED OUR HOTLINE
REPORTING/INCIDENT MANAGEMENT SYSTEMS
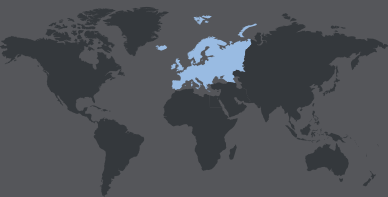**and received 10 or more reports**

in the year 2016 representing

| 20 million employees | generating nearly 14,000 reports in 2016 |

**Our Database Includes Reports From EMEA & APAC**

**Methodology: By the Numbers**

Our report reflects all intake methods:

| web | hotline | open door | email |

Unless otherwise stated, the data in this report includes only NAVEX Global clients, based in EMEA & APAC, that use our Hotline Incident Management Systems warehoused in Europe.

**Most Statistically Accurate Approach**

| We use Medians or Midpoints rather than averages to reduce the impact of outliers | We calculate ranges to help identify extreme data points as potential areas of concern | Medians and ranges provide context for your individual benchmarks |

NOTE: This report is specific to benchmarking organisations in EMEA and APAC. The data was collected and analysed in accordance with applicable data protection laws. All information gathered was anonymised and aggregated without the need to access any personal information contained within the data.

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# EXECUTIVE SUMMARY

This year's analysis of our EMEA & APAC data from nearly 14,000 ethics and compliance hotline reports revealed key data points that compliance professionals can use to benchmark and assess their programme's performance, and move toward predictive risk mitigation. Of note in the 2016 data:

▸ There was a significant increase in overall *Report Rate per 100 Employees* in 2016. The reporting rate doubled in 2016 to a median of 0.4 reports per 100 employees. This significant increase indicates that a higher level of reporting may now be the new norm and that organisations should be prepared to investigate and manage a much higher volume of total reports.

Despite this increase, the reporting volumes for EMEA & APAC is still well below global levels indicating that organisations need to invest in creating greater awareness of available reporting channels.

▸ *Case Closure Time* continues to increase. Median Case Closure Time has been continuously increasing, from 37 days in 2014 to 46 days in 2016—a 24 percent increase. Given the impact that a festering workplace problem can have on morale, productivity, and organisational culture, this is worrisome. Organisations are encouraged to review their case handling and investigation procedures and review with senior leadership any gaps in available resources that need to be addressed.

▸ *Web Submissions* increased as a percentage of overall intake methods. Web Submissions increased from 17 percent in 2015 to 20 percent in 2016 as a percentage of overall intake methods. This may demonstrate a shift in reporting preferences as the workforce continues to show increased comfort levels for web based tools. The overall increase in reporting volumes may also signify a greater awareness, and access to, web reporting mechanisms within EMEA & APAC organisations. This is a positive sign.

▸ *HR Reports* decreased as a percentage of overall reports. Although HR reports still currently account for more than two-thirds of all reports, the data shows a drop in the percentage breakdown of HR related reports from 76 percent in 2014 to 70 percent in 2016. This is now more in line with the percentage breakdown seen in the global report.

# KEY FINDINGS

## 1. Report Volume per 100 Employees

### An Increase in Reporting Rate

*Report Volume per 100 Employees* is a volume metric that enables organisations of all sizes to compare their total number of unique contacts from all reporting channels including telephone, web forms, fax, email, direct mail, open-door conversations and manager submittals.

How to Calculate: Take the total number of unique contacts (incident reports, allegations, internal complaints and specific policy inquiry questions) from all reporting channels received during the period, divide that number by the number of employees in your organisation and multiply it by 100.
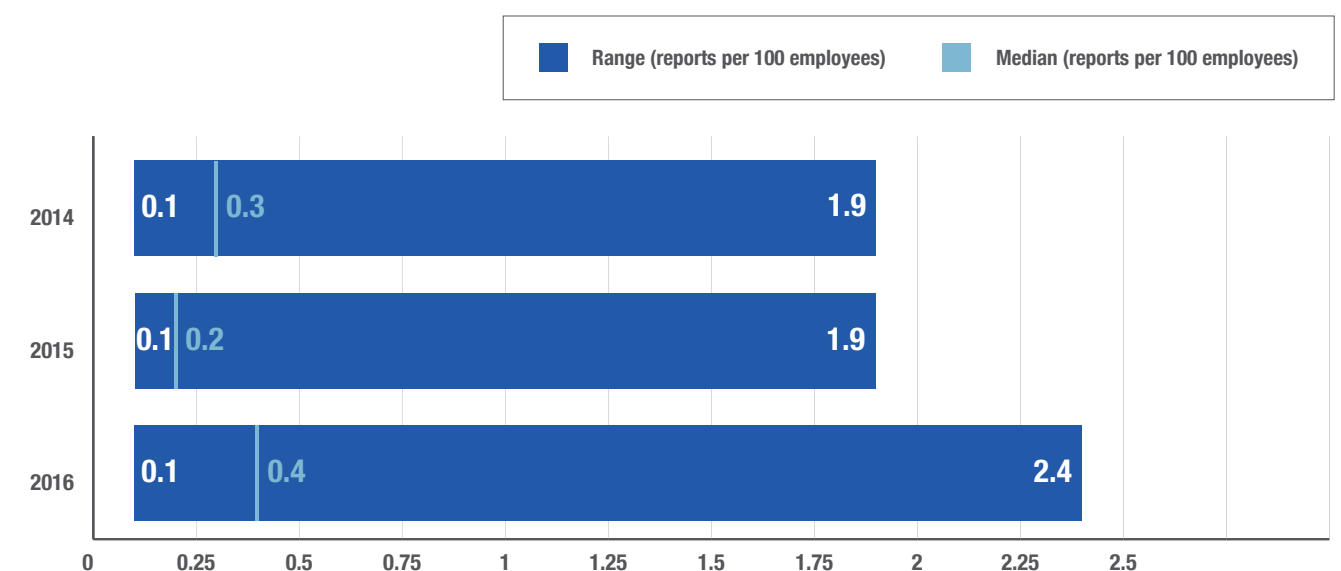
Findings: 2016 saw a significant rise in the reporting rate for EMEA & APAC. The reporting rate rose from a median of 0.2 reports per 100 employees in 2015 to 0.4 reports per 100

employees in 2016. The range of the central 80 percent of the reports also increased—from 0.1 to 1.9 reports per 100 employees in 2015 to 0.1 to 2.4 reports per 100 employees in 2016.

While we recognise that overall reporting volume per 100 employees within EMEA & APAC is still low compared to global figures, the 2016 data shows a significant increase from last year's figures. This significant increase suggests that EMEA & APAC based organisations may continue to see an increase in reporting volumes similar to what we have seen historically from our U.S. based clients.

Organisations operating in EMEA & APAC should assess their hotline programmes and resource them accordingly to prepare for continuing and significant increases in reporting volumes.

How Does Your Report Volume Compare to Others?

■ Range (reports per 100 employees)    ■ Median (reports per 100 employees)

| Year | | | |
|---|---|---|---|
| 2014 | 0.1 | 0.3 | 1.9 |
| 2015 | 0.1 | 0.2 | 1.9 |
| 2016 | 0.1 | 0.4 | 2.4 |

0    0.25    0.5    0.75    1    1.25    1.5    1.75    2    2.25    2.5

# 2. Report Allegation Categories

## HR Reports Are Decreasing

The kinds of reports an organisation receives are indicators of programme effectiveness. Categorising reports and tracking the number of reports in each category can help reveal programme gaps and successes. We organised our report data into five primary Report Allegation Categories. This gives us a way to compare (at a high level) the types of reports that different organisations and industries receive. The categories are:

1. **Accounting, Auditing and Financial Reporting** (i.e, financial misconduct, internal controls, expense reporting)

2. **Business Integrity** (i.e, bribery, falsification of documents, fraud, conflicts of interest, vendor/customer issues)

3. **Human Resources (HR), Diversity and Workplace Respect** (i.e, discrimination, harassment, compensation, general HR, and cases marked as "other")

4. **Environment, Health and Safety** (i.e, environmental compliance, assault, safety, substance abuse)
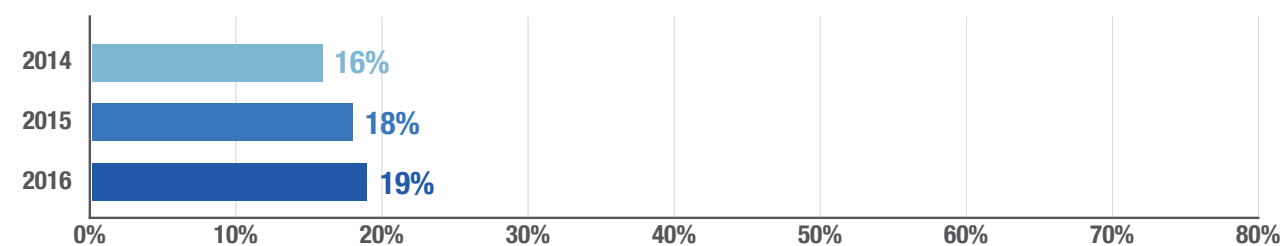
5. **Misuse, Misappropriation of Corporate Assets** (i.e, employee theft, time clock abuse)

How to Calculate: First, ensure each report is placed into one of the five report allegation categories. Then, divide the number of reports in each of the five categories by the total number of reports created during the reporting period.
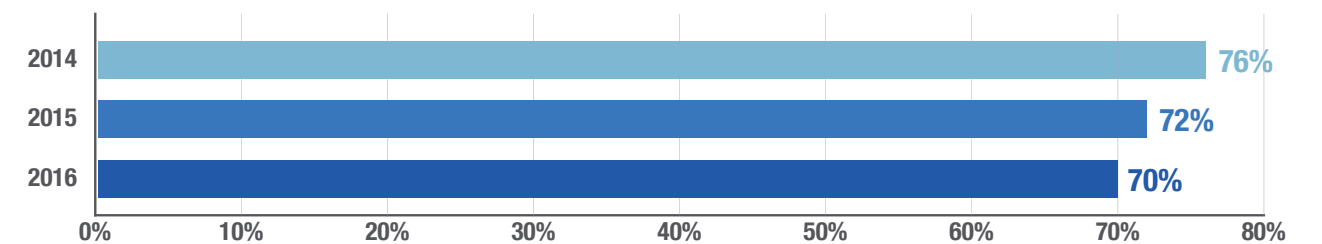
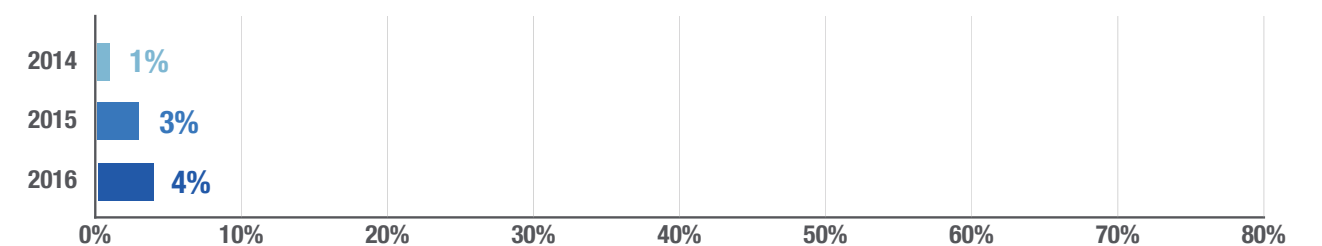### Accounting, Auditing and Financial Reporting
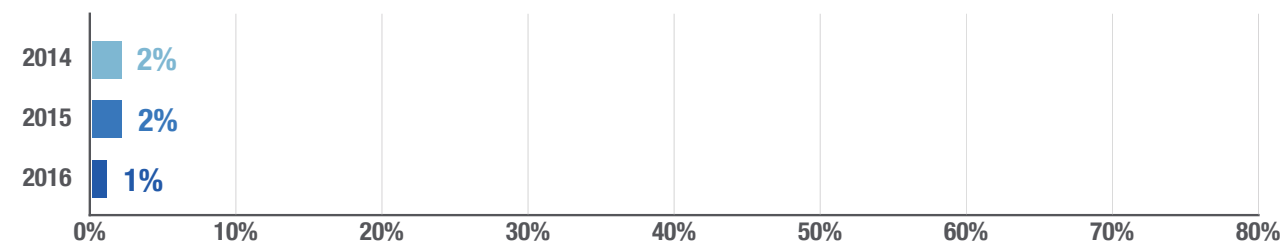


### Business Integrity
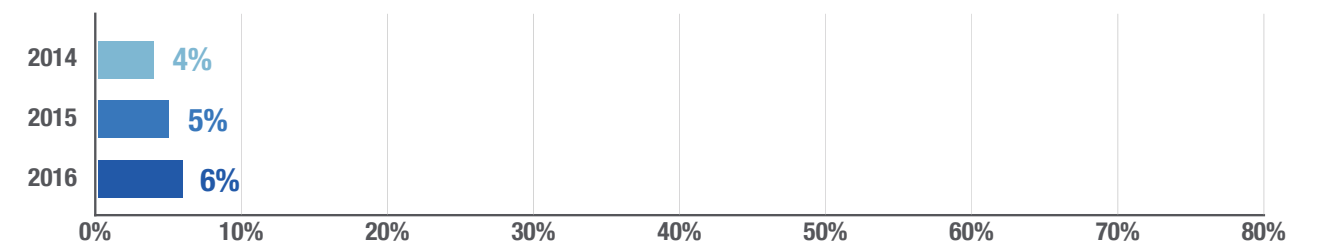


### HR, Diversity and Workplace Respect



### Environment, Health and Safety



### Misuse, Misappropriation of Corporate Assets



Findings: In 2014, reports related to HR, Diversity and Workplace Respect accounted for over three-quarters of all reports received by organisations. This rate decreased slightly in 2015 and dropped further in 2016, although reports in this category still account for 70 percent of all reports received. With the drop in the percentage breakdown of HR related reports in 2015 and 2016, three of the other four categories showed a slight increase. This is a trend worth watching particularly if the *Report Volumes per 100 Employees* continues to increase. These percentages are also now more in line with the breakdown figures shown in the global report.

# 3. Anonymous vs. Named Reporters

## Anonymous Reporting Above Global Rates

*Anonymous Report* metrics show the percentage of all reports submitted by individuals who chose to withhold their identity.

How to Calculate: Divide the number of reports submitted by a reporter who withheld their identity by the total number of reports received.

Findings: From 2014 to 2015 we saw a 6 percentage point increase in anonymous reporting for EMEA & APAC organisations. In 2016 we have seen a 2 percentage point decrease indicating the rate may be flattening out. As there are limitations in some EU countries on the types of issues that may be reported anonymously, we would expect to find a lower rate for EMEA & APAC compared to the global figures. As the anonymous reporting rate for EMEA & APAC continues to remain above the overall global rate, this can indicate a lack of trust in an organisation's reporting system or fear of retaliation for organisations operating in this region.

High levels of *Anonymous Reports* may also make it more difficult for organisations to investigate issues effectively. This is particularly true if reporters do not follow-up on their initial report via the reporting system using their assigned identification numbers.

### Median Anonymous Reporting Rate
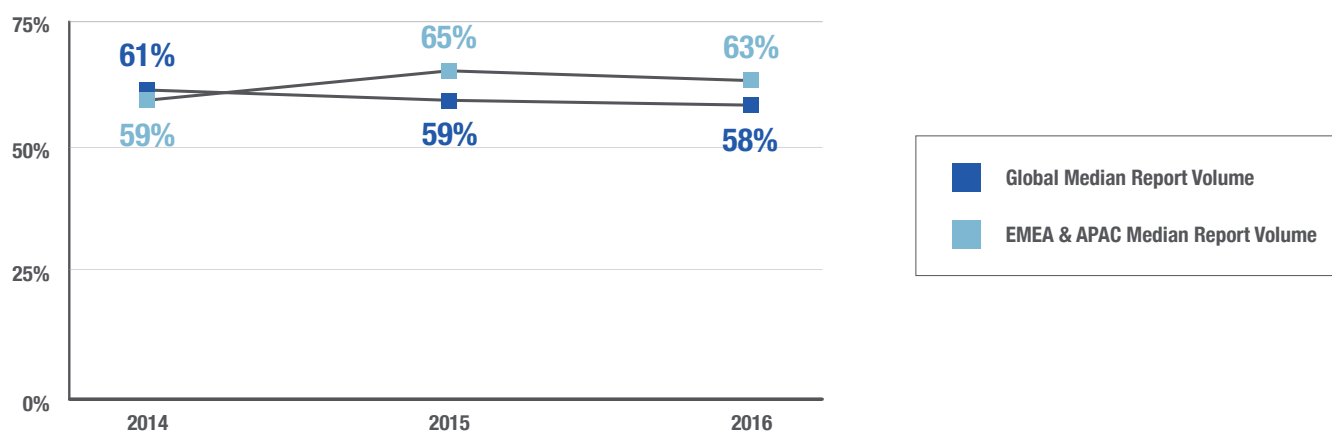


# 4. Reporter Follow-Up Rate to Anonymous Reports

## Low Anonymous Reporter Follow-Up Rate

Effective hotline/helpline programmes encourage anonymous reporters to check back in (anonymously) on the status of their report. If more information is needed to investigate a claim, ethics and compliance officers must be able to reach out through the anonymised reporting interface to ask questions or get clarification. The *Reporter Follow-up Rate to Anonymous Reports* metric indicates the percentage of reports submitted anonymously and that were subsequently followed-up on by the reporter.

How to Calculate: Divide the number of anonymous reports with one or more follow-up case visits by the total number of anonymous reports. (Note that we do not include multiple follow-ups to the same report. We only count the first follow-up to an anonymous report).

Findings: The *Reporter Follow Up Rate to Anonymous Reports* remains generally flat with only 21 to 23 percent of anonymous reporters following up on their initial reports. This is a disappointing result that continues to highlight a concern for EMEA & APAC organisations. We believe that any additional insight provided by the anonymous reporter via a follow-up can improve both substantiation rates and case closure time metrics.

We encourage organisations to educate employees on all steps required for successful anonymous reporting—including the critical responsibility to check back in on their report and provide reasons why checking back is important. If employees have been well educated on this process, lack of follow-up could be a red-flag indicator about the organisation's culture. Tracking this metric is important for identifying training and communications opportunities—as well as identifying potential cultural weak spots.

### Median Follow-Up Rate of Anonymous Reports
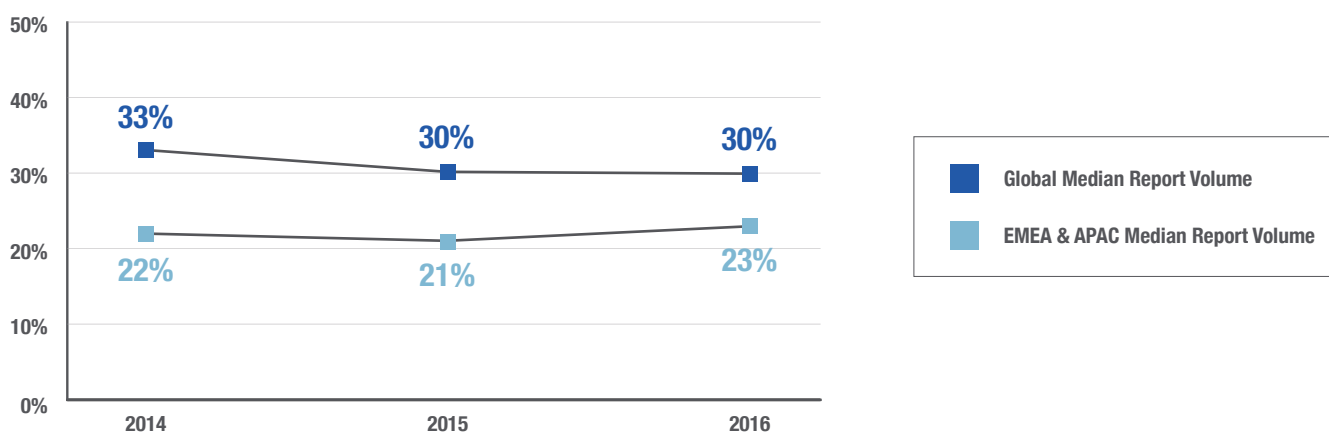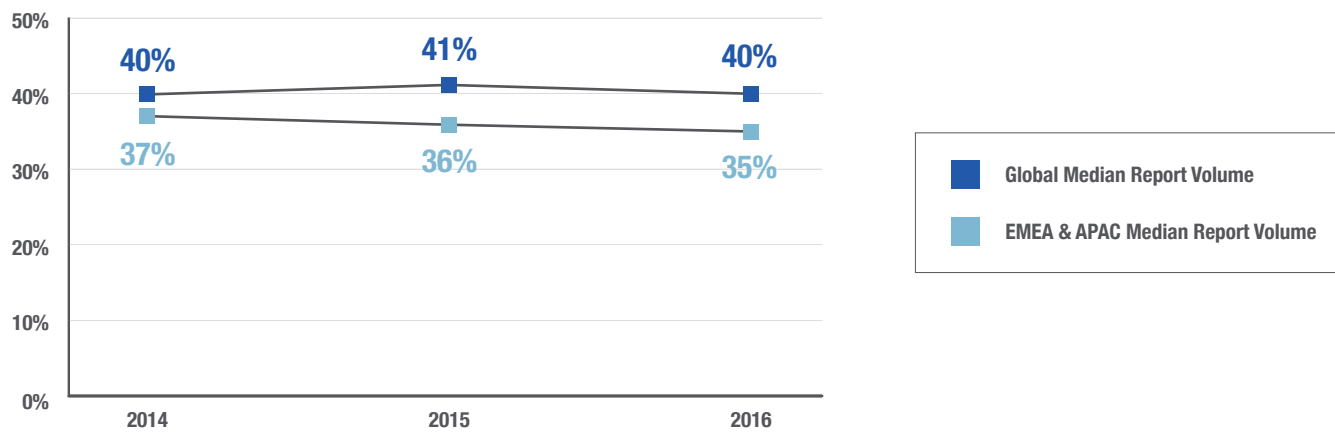
# 5. Substantiated Reports

## Overall Substantiation Rate Below Global Figures

*Overall Substantiation Rate* reflects the rate of allegations made (from both named and anonymous reporters) which were determined to have at least some merit (substantiated or partially substantiated). A high substantiation rate reflects a well-informed employee base making high-quality reports coupled with effective investigation processes.

How to Calculate: Divide the number of overall reports that are (fully or partially) substantiated by the total number of reports that were closed as substantiated, partially substantiated, and unsubstantiated.
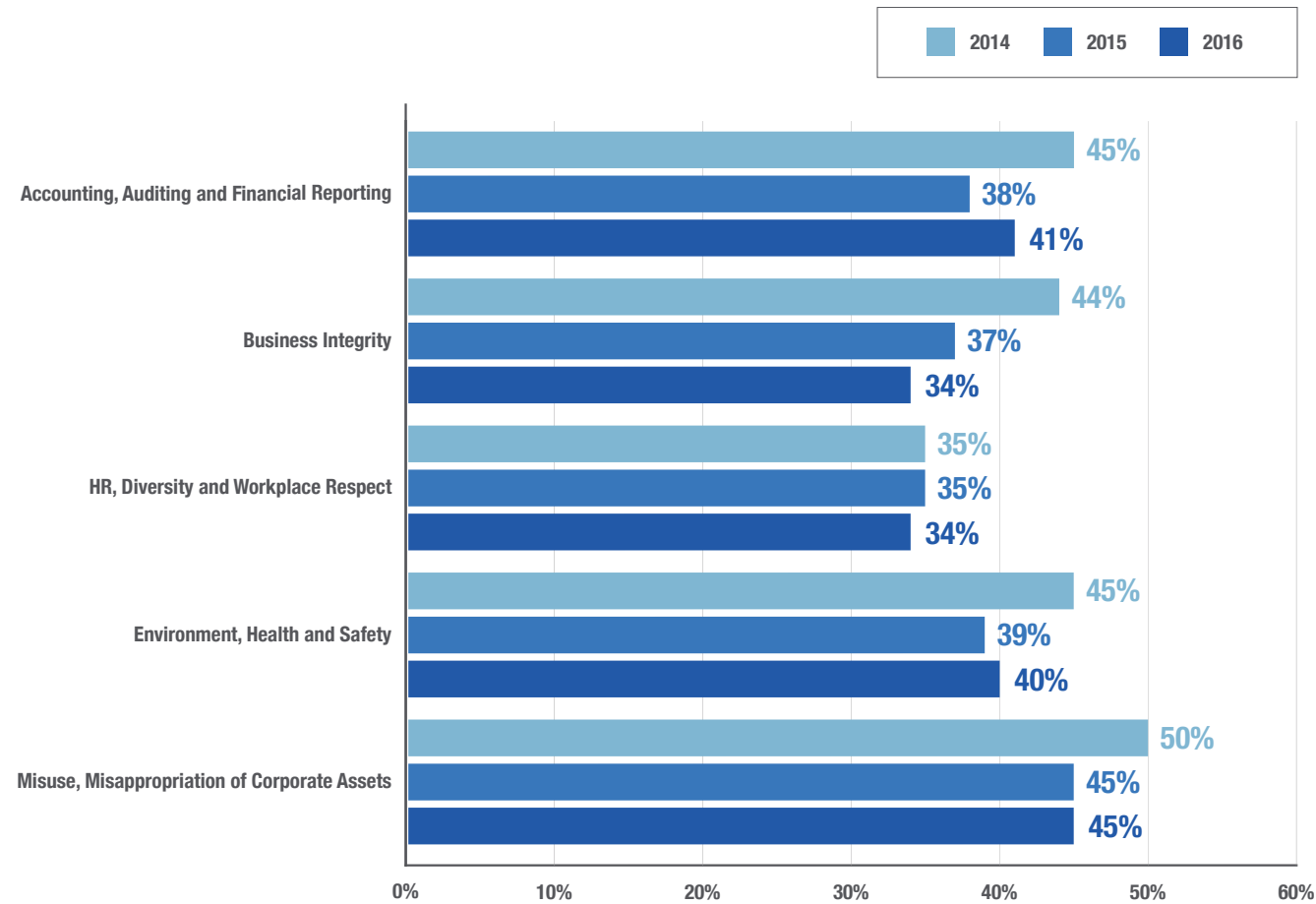
Findings: Across all three years where we have data for EMEA & APAC, more than a third of the reports received were substantiated. This metric indicates EMEA & APAC organisations are receiving actionable reports of misconduct. However, the rate also shows a slight downward trend and remains well below the overall global rate. It is important to note that later in the report we find that the difference between the substantiation rates for named reports has remained around only 10 percentage points higher than for anonymous reports. Due to this, it is critical for organisations to ensure that they are treating both anonymous and named reports with the same sensitivity and importance.

### Median Overall Substantiation Rate

| | 2014 | 2015 | 2016 |
|---|---|---|---|
| Global Median Report Volume | 40% | 41% | 40% |
| EMEA & APAC Median Report Volume | 37% | 36% | 35% |

### Median Substantiation Rate by Allegation Category

Legend: 2014 — 2015 — 2016

**Accounting, Auditing and Financial Reporting**
- 45%
- 38%
- 41%

**Business Integrity**
- 44%
- 37%
- 34%

**HR, Diversity and Workplace Respect**
- 35%
- 35%
- 34%

**Environment, Health and Safety**
- 45%
- 39%
- 40%

**Misuse, Misappropriation of Corporate Assets**
- 50%
- 45%
- 45%

(axis: 0% 10% 20% 30% 40% 50% 60%)

Findings: When reviewing the *Substantiation Rate* by allegation category, there was some movement across two of the five categories but overall little change from 2015 to 2016.

The substantiation rates of HR, Diversity and Workplace Respect and Business Integrity reports continue to remain below 40 percent. However, noting that more than one-third of these reports are still substantiated, these are all still important cases for organisations to track. If organisations add a separate reporting tier for HR and business managers to enter reports received directly, the resulting report analytics will help organisations identify localised problem areas more quickly.

The overall downward trend from the 2014 data is a development that is worth watching for next year. It, therefore, may be beneficial for organisations to check for inconsistencies within its investigative review processes across all allegation categories. Organisations may also want to consider short-form trainings to ensure that all employees are aware of what types of violations to be on the lookout for.

# 6. Substantiated Anonymous vs. Named Reports

## Anonymous And Named Reporting Rates Remain Flat

A bias can exist among senior leaders and board members against the acceptance of anonymous reports. However, research has shown that names are withheld typically out of fear of retaliation or a desire to not be involved—not because the issue reported is deliberately false or frivolous. As noted in the section on *Reporter Follow-up Rate to Anonymous Reporters*, investigators may be unable to get the information they need to follow up on anonymous reports. This may also somewhat explain the gap between substantiation rates for "named" and "anonymous" reports.

How to Calculate Substantiated Anonymous Reports: Divide the number of anonymous reports that are (fully or partially) substantiated by the total number of reports that were closed as substantiated, partially substantiated and unsubstantiated.

How to Calculate Substantiated Named Reports: Divide the number of reports from named reporters that are (fully or partially) substantiated by the total number of reports that were closed as substantiated, partially substantiated and unsubstantiated.

Findings: The substantiation rates for both named and anonymous reporters remained relatively flat for the three years from 2014 to 2016. The rate of substantiated named reports has remained roughly 10 percentage points above the substantiation rate of anonymous reports, which is in line with global rates.

As discussed earlier in this report, we encourage organisations to place a continued focus on increasing follow-ups to anonymous reports. This could increase the *Substantiation Rate of Anonymous Reports* because investigators would have a higher probability of obtaining responses to posed questions. We expect named reports to have a higher substantiation rate as named reports allow investigators to gather information directly from the reporter, which can help to improve the effectiveness of an investigation.

Comparison of Substantiation Rates between Anonymous And Named Reporters



Legend:
- Anonymous Substantiation Rate
- Named Substantiation Rate
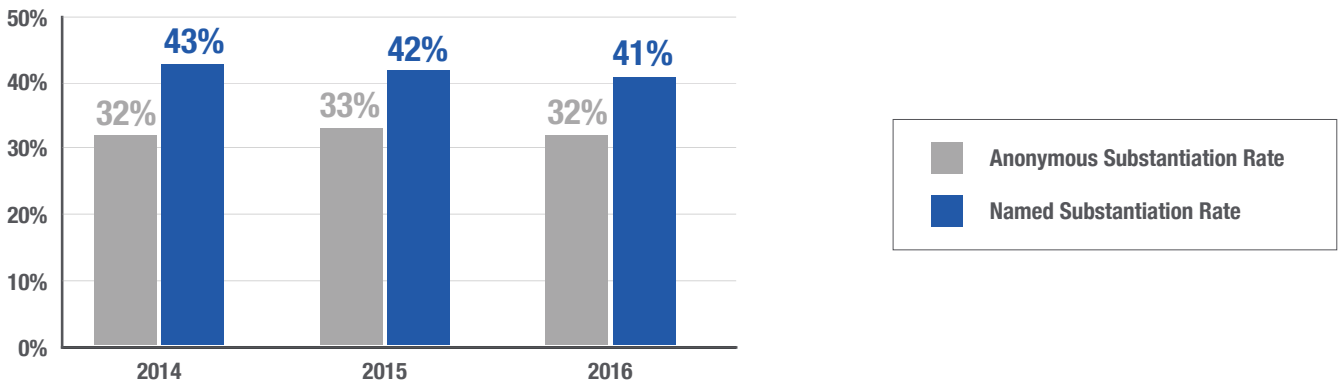
# 7. Case Closure Time
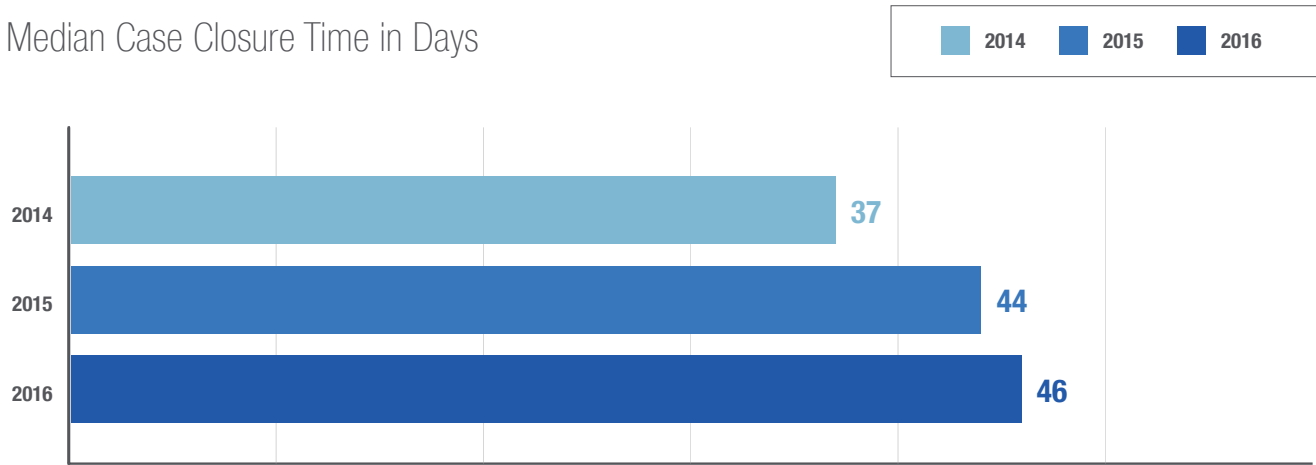
## Case Closure Times Continue to Increase

*Case Closure Time* is the number of calendar (not business) days it takes an organisation to complete an investigation and close a case. To earn employees' trust, and ensure that they know their concerns are important and are being seriously considered, it is vital that organisations complete investigations in a timely fashion. If months go by without a case being resolved, reporters may conclude that the organisation is not listening and not taking action which could be detrimental to an organisation on a number of levels.

How to Calculate: First calculate the number of days between the date a case is received and the date it is marked closed. Calculate for each case closed during the reporting period. (Calculating the 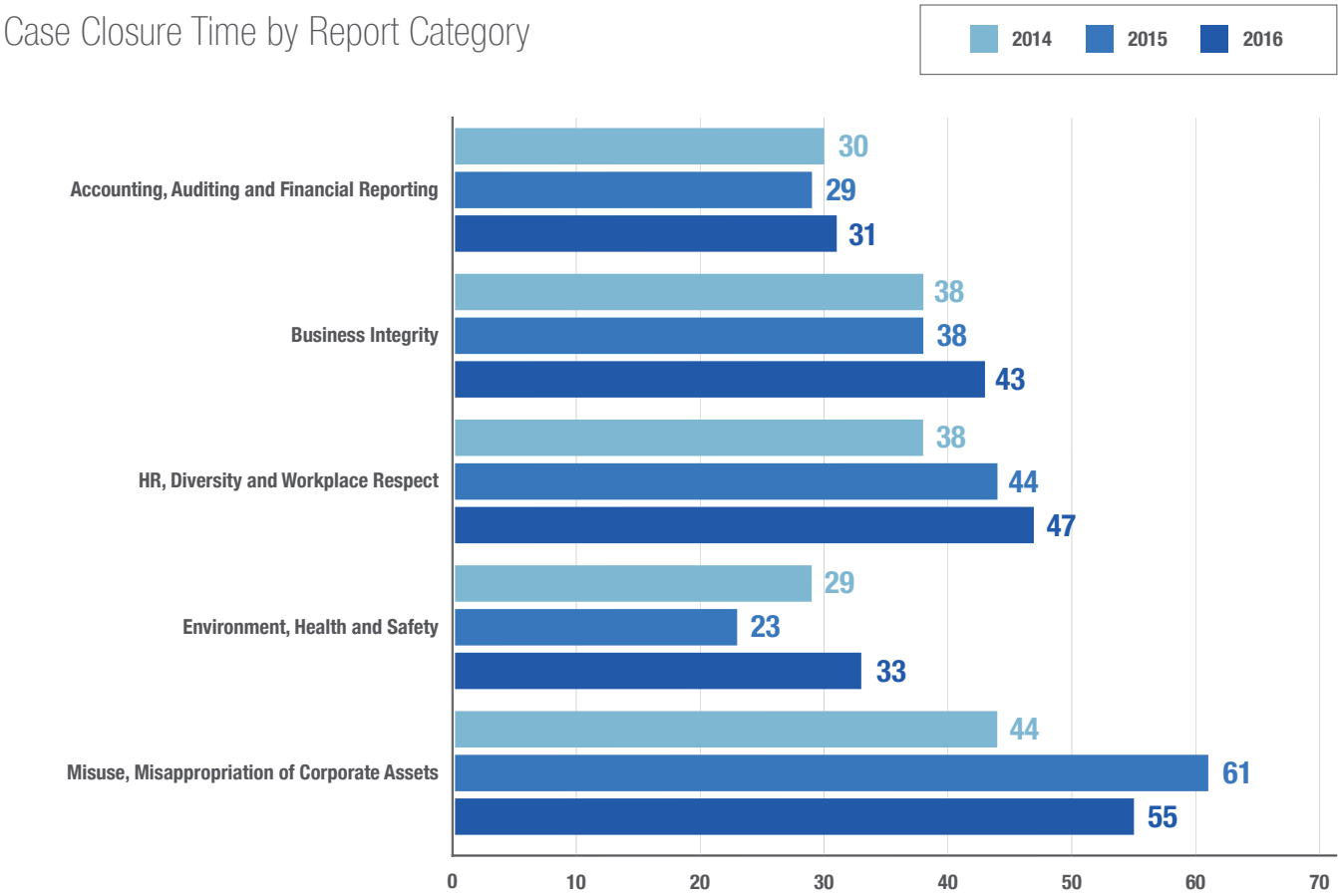rate based on case open date will skew the data toward shorter closure times, making the result less accurate.) Then, calculate the *Case Closure Time* by dividing the sum of all case closure times by the number of cases closed in the reporting period.

Findings: In the past two years the median *Case Closure Time* has continued to climb from 37 to 46 days. This represents over a twenty four percent increase in case closure time between 2014 and 2016. This is a significant concern tempered only by the fact that the overall median reporting rate also increased from 2015 to 2016. Organisations that significantly or consistently exceed an average 30 day *Case Closure Time* are encouraged to review their case handling and investigation procedures and review with senior leadership any gaps in available resources that need to be addressed.

### Median Case Closure Time in Days

| | 2014 | 2015 | 2016 |
|---|---|---|---|

| 2014 | 37 |
|---|---|
| 2015 | 44 |
| 2016 | 46 |

### Case Closure Time by Report Category

| | 2014 | 2015 | 2016 |
|---|---|---|---|

| Accounting, Auditing and Financial Reporting | 30 / 29 / 31 |
|---|---|
| Business Integrity | 38 / 38 / 43 |
| HR, Diversity and Workplace Respect | 38 / 44 / 47 |
| Environment, Health and Safety | 29 / 23 / 33 |
| Misuse, Misappropriation of Corporate Assets | 44 / 61 / 55 |

Findings: *Case Closure Time* by report category shows that there has been an increase in case closure time for all five categories since 2014.

Of serious concern is that the time to close HR, Diversity and Workplace matters rose from 38 to 47 days. The continued increase in *Case Closure Time* is indicative of the increase in *Report Volume per 100 Employees* seen earlier in this report.

Many HR-related cases are often able to be addressed within a week if they receive prompt attention. Given the impact that a festering workplace problem can have on morale, productivity, and organisational culture, taking over 40 days to address and close this type of case is worrisome.

The data for Case Closure Time by Report Category in last year's report was identified to contain incorrect information. We apologise, and have updated the metric to reflect the correct numbers.

# 8. Reporting Intake Method

## Web Submissions Increased as a Percentage of Overall Intake Methods

Monitoring the mix of reporting methods employees chose to use can provide insight into how aware employees are of their different reporting options and their comfort level with the available options.

Several factors impact intake method. First, multiple reporting channels should be made available to employees. Second, those channels need to be easily accessible to employees. And finally, employees need to be aware of all the channels available to them so that when they have a reporting need, they know where to go, what to do, and have one or more options available to them that they are comfortable using.

How to Calculate: Group all non-hotline and non-web report forms (like ethics office open door walk-ins, email, postal mail, fax and manager submissions) as "All Other Methods." Tally up the number of reports received by each intake method (Hotline, Web Submission, and All Other Methods) and divide by the total number of reports. The resulting percentages represent how employees are choosing to report.

Findings: Results for 2016 showed little change from 2015 in the overall mix of intake methods with the majority of reports received by methods other than hotline (phone) or web reporting. Hotline submissions remain steady, web reporting increased by 3 percentage points and a decrease of 3 percentage points for "All Other Methods." The increase in "Web Submissions" from 2015 may demonstrate a shift in reporting method as the workforce continues to feel more comfortable using web-based tools.

Report Intake Method Comparison*
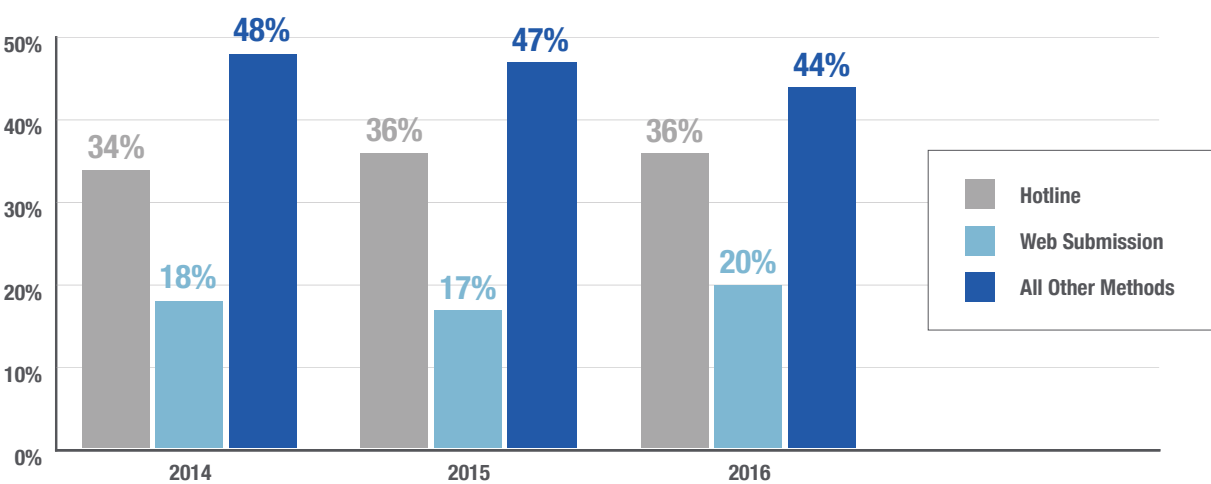


# 9. Geographical Data

During the years that we have been publishing our global reports, we have been asked to provide data based on a breakdown by geographic region. This year we completed a deeper dive into this topic by reporting on individual geographies, namely: Africa, Asia, Australia, Europe and North and South America. While we are not able to calculate specific regional information for every metric we track, we were able to calculate several metrics that have provided some very interesting insights. The three data points included a breakdown of:

‣ Report origination by geography
‣ Anonymous reports by geography
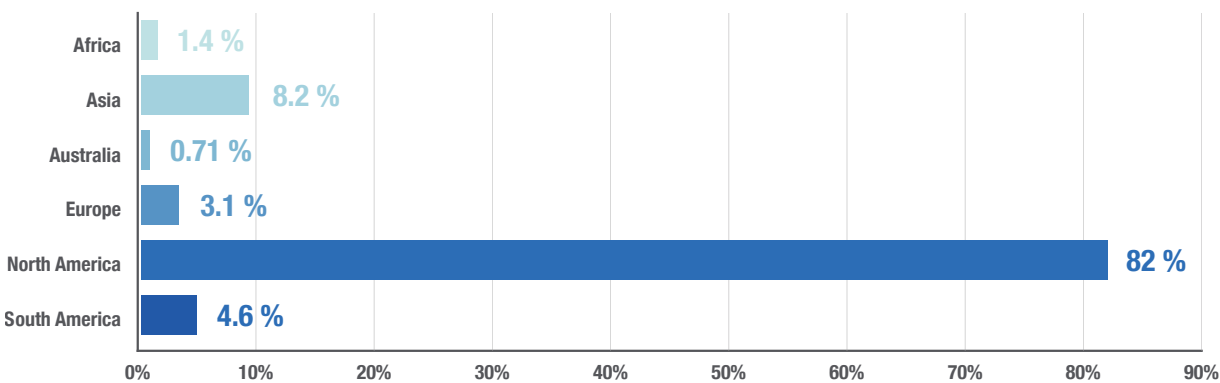‣ Substantiation rates by geography—both named and anonymous

How to Calculate: First, identify the country location for each report, then categorise that country by continent. To determine the report dispersion, divide the total number of reports from each continent, by the total number of reports received. This calculation can be repeated for the anonymity and substantiation rates.

Findings: While it was not surprising to find that the highest percentage of reports by far originated from North America (82%), it was interesting to note that Asia was second, South America was third, and Europe was fourth. Africa, followed by Australia, had the lowest, as shown in the chart below.

Much has been written and debated in Europe about the need for, and value of, whistleblower hotlines, and cultural concerns continue to be expressed about anonymous reporting. This context makes the data we found in these next two charts most interesting. While noting that the overall percentage of reports originating from Europe is low, the highest percent of *Anonymous Reports* originated from Europe and not North America. Further, the highest *Substantiation Rate* overall—and for anonymous reports separately—was for reports that originated in Europe.
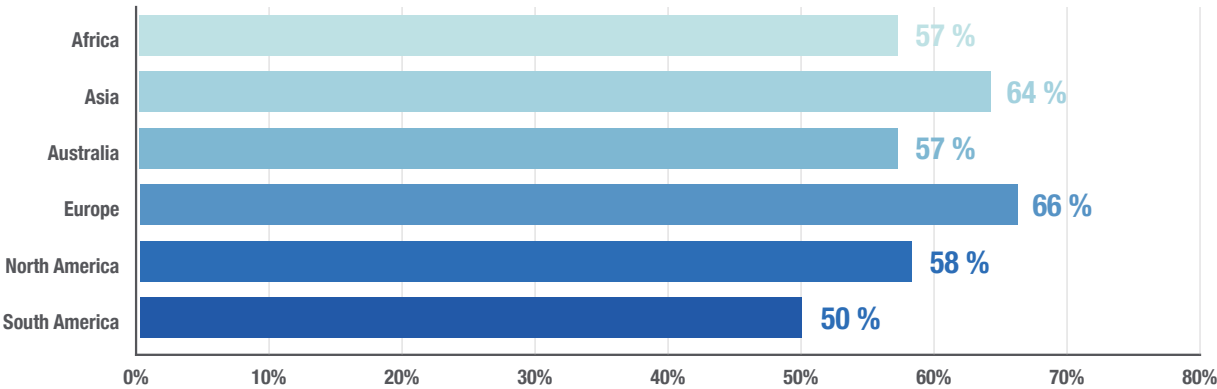
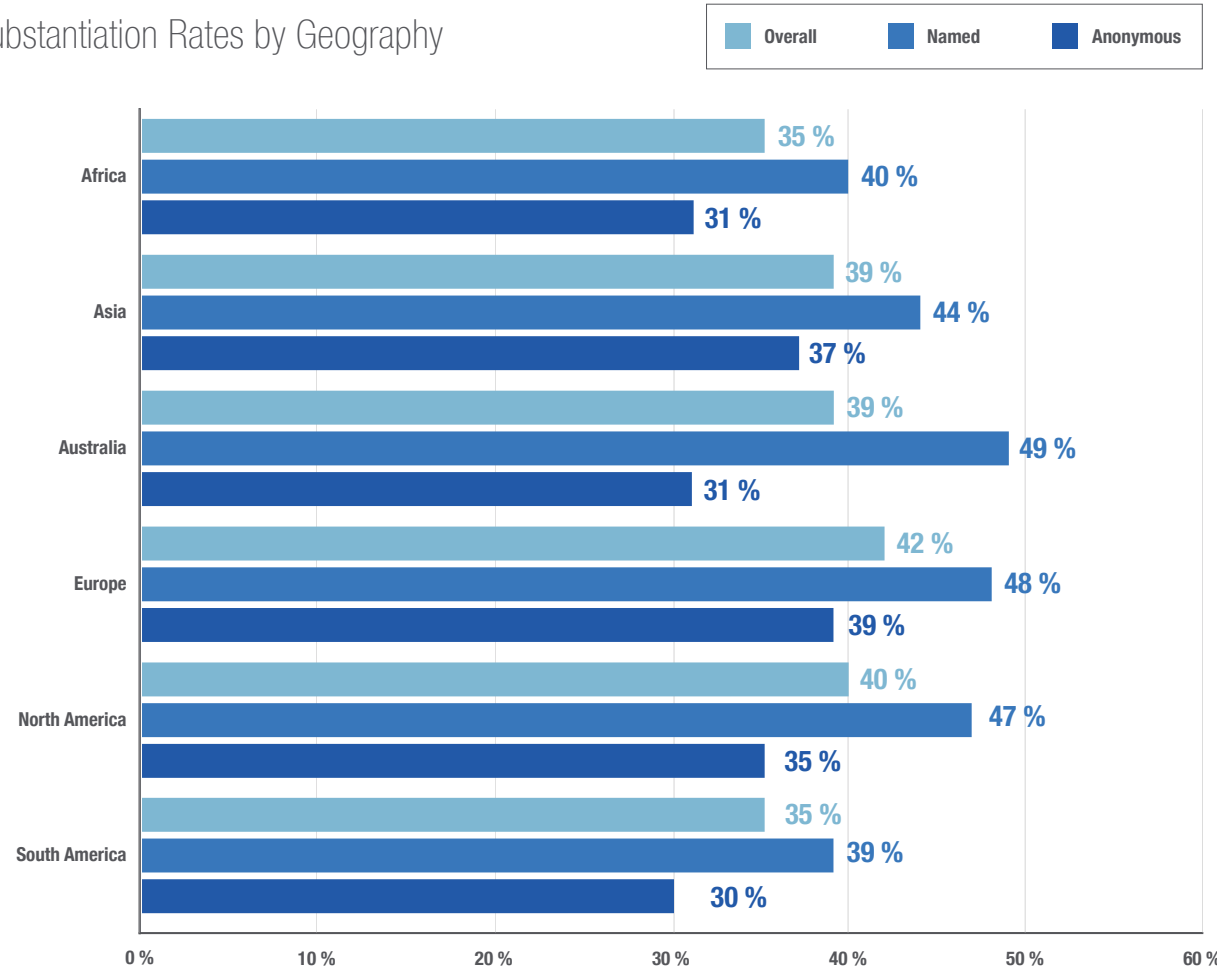Report Origination Breakdown by Geography

## Anonymous Reports by Geography

| Region | Value |
|--------|-------|
| Africa | 57 % |
| Asia | 64 % |
| Australia | 57 % |
| Europe | 66 % |
| North America | 58 % |
| South America | 50 % |

0%  10%  20%  30%  40%  50%  60%  70%  80%

## Substantiation Rates by Geography

**Overall** ■ **Named** ■ **Anonymous** ■

| Region | Overall | Named | Anonymous |
|--------|---------|-------|-----------|
| Africa | 35 % | 40 % | 31 % |
| Asia | 39 % | 44 % | 37 % |
| Australia | 39 % | 49 % | 31 % |
| Europe | 42 % | 48 % | 39 % |
| North America | 40 % | 47 % | 35 % |
| South America | 35 % | 39 % | 30 % |

0 %  10 %  20 %  30 %  40 %  50 %  60 %

# CONCLUSION

Ethics and compliance officers have many opportunities to leverage the data in their hotline and incident management systems to improve their compliance programmes—and their organisational culture of ethics and respect. This year's benchmarks point to several opportunities to increase programme effectiveness:

- **Make the business case for matching your report volume with appropriate resources.** Report volumes are up. If this trend follows U.S. historical reporting data, we would expect to see reporting volumes for EMEA & APAC organisations continue to increase into the next decade. If your organisation hasn't caught up to the "new normal" in reporting volume, use the data we've provided to help make the business case with your board and executive leadership for adding resources and tools.

- **Increase focus on anti-retaliation efforts.** Several government regulatory bodies, including in the UK, the Netherlands, and France, issued new guidance on protection from retaliation in 2016. The higher levels of anonymous reporting compared to global data may indicate a lack of trust in the system or fear of retaliation, particularly as there are no EU incentives for reporting. A higher level of anonymous reports may also

make it more difficult to investigate concerns particularly if reporters do not follow-up on their initial report via the reporting system using their assigned identification numbers. It is time to really focus internal attention on this important topic with training and awareness—and consider making this a regular part of board reports.

- **Increase employee awareness of reporting systems.** Because EMEA & APAC reporting volumes are significantly lower than global reporting volumes, this may suggest that organisations need to boost employee awareness on the availability of its reporting channels. Organisations need to constantly work to drive awareness of the reporting programme with employees and relevant stakeholders. Effort should be made to ensure employees know how to report, what issues to report on and why reporting is important. Most importantly, make it clear they can report without fear of retaliation. Make sure you have a policy on anti-retaliation. Make it clear in communication materials that the organisation will not tolerate retaliation in any form against anyone who reports issues or participates in an internal investigation.

- **Focus efforts on improving case closure times.** Case closure times continue to increase. A festering workplace issue

can drag down morale, productivity and organisational culture. It can also lead to allegations being reported outside the organisation to regulatory bodies directly. Best practice case closure time is an average of 30 days. Look carefully at the factors that could be causing delays in closing cases and address them. This could include reviewing assignment and investigation processes.

- **Get a more complete picture of your risks by documenting all reports in one centralised incident management system.** Our global hotline benchmark finds reports received from sources beyond the hotline and web reporting systems have a high substantiation rate. This makes documenting reports from all reporting channels in an incident management system more important than ever. Documenting all cases creates a more accurate, comprehensive and holistic view of your ethics and compliance cases—and the cultural health of your organisation. It also increases the rigour with which you can track, investigate, analyse and resolve those reports.

- **Take advantage of the reporting data relating to geography.** This EMEA & APAC benchmark report analyses reporting data warehoused in Europe. We have also provided reporting data by geographic location for some metrics. This provides

some valuable insights that can lead to good discussions in global organisations. And, smaller organisations can confirm that reporting systems with multiple avenues available are an important part of an effective programme.

Hotline data that is carefully tracked, reviewed, benchmarked and presented with sufficient context often provides the early warning signs needed to detect, prevent and resolve problems. We at NAVEX Global hope that this report is helpful to your organisation and we welcome any feedback on these findings.

# ABOUT NAVEX GLOBAL

More than 12,500 clients around the world trust NAVEX Global to power their ethics and compliance (E&C) programmes. Our flexible, scalable solutions make E&C programmes more effective, and complex E&C tasks easier to manage. NAVEX Global's integrated suite of proven E&C tools, content and services equips organisations to identify and contain compliance risks and threats. Whether you need one solution or our full suite, we're ready to help protect your people, reputation and bottom line.

## Policy Management: PolicyTech™

Centralise, simplify and strengthen your policy management lifecycle with PolicyTech™. Automating this foundational process of your E&C programme reduces legal risk while increasing productivity, accessibility and accuracy of your policies.

## Online Training

Strengthen your organisational culture, meet legal requirements and inspire behavioural change by deploying our award-winning online ethics and compliance training. Our robust library of courses, exclusively endorsed by the Association of Corporate Counsel (ACC), sets the industry standard for quality.

## Hotline Reporting & Incident Management

Trusted by thousands of clients around the world, our hotlines help employees, customers, suppliers and other stakeholders quickly and easily report potential ethics and compliance issues. Our integrated incident management solutions capture and investigate E&C reports from across the organisation helping you spot trends and take corrective action before minor issues become major.

## Enterprise Due Diligence: RiskRate™

Protect your organisation from third party risk with continuous due diligence. RiskRate™ is an affordable, highly automated platform that performs around-the-clock, third party risk monitoring and enhanced due diligence—the industry standard for effective enterprise risk management.



# ADDITIONAL TOOLS & THOUGHT LEADERSHIP RESOURCES

NAVEX Global also offers many valuable resources relating to improving ethics & compliance programmes. Visit our resource centre at www.navexglobal.com/en-uk/resource-center to find these tools and more.

## Research Reports

» 2017 NAVEX Global Ethics & Compliance Hotline Benchmark Report
http://www.navexglobal.com/en-gb/resources/benchmarking-reports/2017-hotline-incident-management-benchmark-report

» 2017 EMEA Culture & Compliance Programme Benchmark Report
http://www.navexglobal.com/en-gb/resources/benchmarking-reports/2017-emea-culture-compliance-programme-benchmark-report

» 2016 NAVEX Global Ethics & Compliance Ethics & Compliance Policy Management Benchmark Report
http://www.navexglobal.com/en-uk/resources/benchmarking-reports/2016-emea-ethics-compliance-policy-management-benchmark-report

» UK Financial Services Whistleblowing Regulation Survey
http://www.navexglobal.com/en-uk/resources/benchmarking-reports/uk-financial-services-whistleblowing-regulations-report

» 2016 NAVEX Global Ethics & Compliance Third-Party Risk Management Benchmark Report
http://www.navexglobal.com/en-uk/resources/benchmarking-reports/2016-third-party-risk-management-benchmark-report

» 2016 NAVEX Global Ethics & Compliance Training Management Benchmark Report
http://www.navexglobal.com/en-uk/resources/benchmarking-reports/navex-globals-2016-ethics-compliance-training-benchmark-report

## Definitive Guides

» Definitive Guide to Incident Management
http://www.navexglobal.com/en-uk/resources/ebooks/definitive-guide-to-incident-management

» Definitive Guide to Ethics & Compliance Training
http://www.navexglobal.com/en-uk/resources/ebooks/definitive-guide-to-ethics-compliance-training

» Definitive Guide to Policy Management
http://www.navexglobal.com/en-uk/resources/definitive-guide-policy-management

» Definitive Guide to Third Party Risk Management
http://www.navexglobal.com/en-uk/resources/ebooks/definitive-guide-to-third-party-risk

## Whitepapers

» Top 10 Ethics & Compliance Predictions and Recommendations for 2017
http://www.navexglobal.com/en-uk/resources/whitepapers/top-ten-ethics-compliance-predictions-and-recommendations-2017

» Solving the Top Five Concerns of Compliance Professionals
http://www.navexglobal.com/en-uk/resources/solving-top-five-concerns-compliance-professionals

» What GRC Will Look Like by 2025 and How to Plan for It Now
http://www.navexglobal.com/en-uk/resources/whitepapers/what-grc-will-look-like-by-2025-how-to-plan-for-it-now

» An Holistic Approach to Anti-Corruption Compliance
http://www.navexglobal.com/en-uk/resources/whitepapers/Holistic-Approach-Anti-Corruption-Compliance

## On-Demand Webinars

» How Do I Prove My E&C Programme is Effective? The Art & Science of Effectiveness Measurement
http://www.navexglobal.com/en-uk/resources/webinars/how-do-i-prove-my-ec-program-is-effective_the-art-and-science

» Become a Strategic Partner to the Board & C-Suite: Advance Your Programme and Career
http://www.navexglobal.com/en-uk/resources/webinars/vc-2016-becoming-strategic-partner-to-board-c-suite

» Benchmarking 101: Shaping your E&C Programme for Maximum Value
http://www.navexglobal.com/en-uk/resources/webinars/vc-2016-benchmarking-101-shaping-your-ec-program-for-maximum-value

## Blog Posts

» Understanding the Benefits of Benchmarking & How to Do It Successfully
http://www.navexglobal.com/blog/understanding-benefits-benchmarking-how-do-it-successfully

» ISO 37001: Insights into the New Anti-Bribery Standard
http://www.navexglobal.com/blog/iso-37001-lets-talk-specifics

» New Compliance Regulations for France & Italy Demonstrate the Convergence of Anti-Corruption Standards in Europe
http://www.navexglobal.com/blog/new-compliance-regulations-france-and-italy-demonstrate-growing-convergence-anti-corruption-and

# ABOUT THE AUTHORS

NAVEX Global's comprehensive suite of ethics and compliance software, content and services helps organisations protect their people, reputation and bottom line. Trusted by 95 of the FORTUNE 100 and more than 12,500 clients, our solutions are informed by the largest ethics and compliance community in the world. For more information, visit www.navexglobal.com.

## Carrie Penman
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Carrie Penman is the Chief Compliance Officer and Senior Vice President, Advisory Services for NAVEX Global. Carrie has been with NAVEX Global since 2003 after serving four years as deputy director of the Ethics and Compliance Officer Association (ECOA). Carrie was one of the earliest ethics officers in America. She is a scientist who developed and directed the first corporate-wide global ethics program at Westinghouse Electric Corporation. Since joining NAVEX Global's team, she has conducted numerous program and culture assessment projects for its clients and regularly works with and trains company board of directors and executive teams. She also serves as a corporate monitor and independent consultant for companies with government agreements. Carrie is the author of numerous compliance related articles and commentary and is regularly quoted as a compliance expert in press and publications. In the last two years, Carrie has been featured in the Wall Street Journal and on the cover of Compliance Week magazine.

## Edwin O'Mara
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Eddy O'Mara leads the development of our Integrity Diagnostics and Metrics product offering, as well as making key statistical and analytical contributions to our annual ethics and compliance Hotline Benchmark Report, Client Culture Surveys and Assessments. Eddy graduated from Bentley University with both a B.A. in Ethics and Corporate Social Responsibility and a B.S. in Business Management. He has been with NAVEX Global's Advisory Services team since 2012.

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