



NAVEX<sup>®</sup>

2022

# Definitive Risk & Compliance

■ Benchmark Report



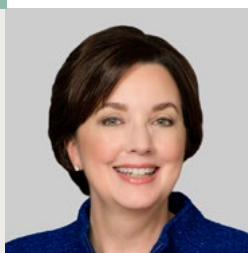
NAVEX is the recognized leader in risk and compliance management software and services, empowering thousands of customers around the world to manage and mitigate risks with confidence. NAVEX's mission is to help customers promote ethical, inclusive workplace cultures, protect their brands and preserve the environment through sustainable business practices.

For more information, visit [NAVEX.com](https://navex.com) and our [blog](#). Follow us on [Twitter](#) and [LinkedIn](#).



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# Introduction

NAVEX has been collecting and delivering leading-edge market benchmark reports to the risk and compliance (R&C) industry since 2012. In 2019, we published our first-ever “Definitive Corporate Compliance Benchmark Report,” a comprehensive review of R&C programs that offered key findings, analysis and insight to help organizations measure, evaluate and advance their programs.

This year, NAVEX partnered with independent research firm The Harris Poll to survey R&C professionals from a wide range of industries about the design, priorities and performance of their R&C programs. The results of the survey represent over 1,000 respondents globally who influence or manage their organization’s risk and compliance programs. In addition, this report includes detailed responses from those who actively manage or influence their program’s incident management, policy and procedure management, ethics and compliance training, third-party risk management, integrated risk management, and/or environmental, social and governance (ESG) functions. Insights and analysis addressed in the new 2022 report include:

- What are the top priorities of R&C decision-makers?
- What elements make an effective R&C program and how are they administered?
- How do programs evaluate their performance?
- How does technology impact program effectiveness and design?
- How does senior management’s view of R&C programs influence program outcomes?
- How do R&C programs integrate risk management functions?
- What role does the regulatory environment play in program performance?
- How can a successful program reduce regulatory risk while measurably improving efficiency, accuracy and consistency?

## How to Use This Report

The data and insights in this report help chief compliance officers and other R&C professionals make informed program decisions. The report also outlines practical ways to improve R&C programs of all maturity levels and organizational sizes.

- Benchmark your organization’s program against peers, industry standards and best practices.
- Assess your program maturity.
- Identify specific steps to improve performance.
- Review and compare program priorities and effectiveness measures.
- Determine whether your approach to organizational risk is aligned with market trends and best practices.
- Review how your organization is protected or exposed to risk through your approach to incident management; policy and procedure management; ethics and compliance training; third-party risk management; and environmental, social and governance practices.
- Leverage reports and recommendations to get organizational buy-in, budget and understanding of the ROI of a comprehensive risk and compliance program.



## Survey Methodology

The research was conducted online primarily in the U.S. by The Harris Poll on behalf of NAVEX among 1,105 current and prospective customers (including 774 U.S., 331 from at least 18 other countries) aged 18 or older who are knowledgeable about risk and compliance and are nonacademic professionals (management/non-management or higher). The survey was conducted March 30 through May 9, 2022.

Raw data were not weighted and are therefore only representative of the individuals who completed the survey. Also, note that there is no sampling error, since all current and prospective NAVEX customers had the opportunity to respond to the survey.

Assuming the less than 1 percent sample who did respond contains no nonresponse bias and only random error, the precision of Harris online polls is measured by using a Bayesian credible interval. For this study, the sample data is accurate to within  $\pm 2.9$  percentage points using a 95 percent confidence level. This credible interval will be wider among subsets of the surveyed population of interest.

All sample surveys and polls, whether they use probability sampling or not, are subject to other multiple sources of error which are most often not possible to quantify or estimate, including, but not limited to, coverage error, error associated with nonresponse, error associated with question wording and response options, and any post-survey weighting and adjustments (not applicable in this case).

All charts show data rounded to the nearest whole percent. The values of some percentages are too small to be shown in the charts. Please refer to the Appendix for more detailed data.



## Key Definitions

**POLICY MANAGEMENT** includes controlling the organization's policies and procedures throughout the policy lifecycle: drafting, editing, approving, updating, distributing, storing and documenting attestations. Policy management software (or a policy management system) refers to the technology that enables more efficient management and execution of those practices.

**ETHICS AND COMPLIANCE (E&C) TRAINING** includes regulatory compliance, conduct, employment law and information security training from a behavioral perspective. This definition includes all forms of training on ethics and compliance topics: online, in-person, virtual and blended training approaches. Educational and awareness approaches are also within this scope of training.

**INCIDENT MANAGEMENT** typically consists of telephone, web, mobile and other whistleblower channels where employees and other stakeholders can make reports. Incident management systems record and encourage responses to questions, reports and incidents received, and offer executive reporting tools and the ability to track and manage resolution.

**THIRD-PARTY RISK MANAGEMENT** is an umbrella term that refers to all risk-management activities related to third parties: onboarding, screening, monitoring and in-depth risk analysis; as well as associated processes to identify, stratify, prioritize and mitigate third-party risks. Third-party due diligence refers to the studied assessment of third parties before, during and after an engagement. Internal business justifications, external preliminary risk assessments, establishing business rules and

authorizations, processing documentation and policies, database analysis and reputational reporting are all third-party due diligence. It also includes active monitoring of third-party engagements for new “red flags” and real-time changes to the third party's risk profile.

**INTEGRATED RISK MANAGEMENT** is a process that improves decision making and enhances business value by integrating risk intelligence into activities across the enterprise, such as strategic planning and strategy execution, investment decision making, project portfolio management, enterprise performance management, third-party performance management and information governance.

**ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG)** is a subset of non-financial performance indicators which include sustainable, ethical and corporate governance issues such as managing a company's carbon footprint and ensuring there are systems in place to ensure accountability.

**PROGRAM MATURITY** is a measure of the size and sophistication of a company's existing risk and compliance program. For the purposes of the 2022 study, maturity designations were self-reported based on the criteria of the High-Quality Ethics & Compliance Program (HQP) Assessment from the Ethics & Compliance Initiative (ECI).<sup>1</sup> We utilize program maturity as an indicator of current proficiency and performance.

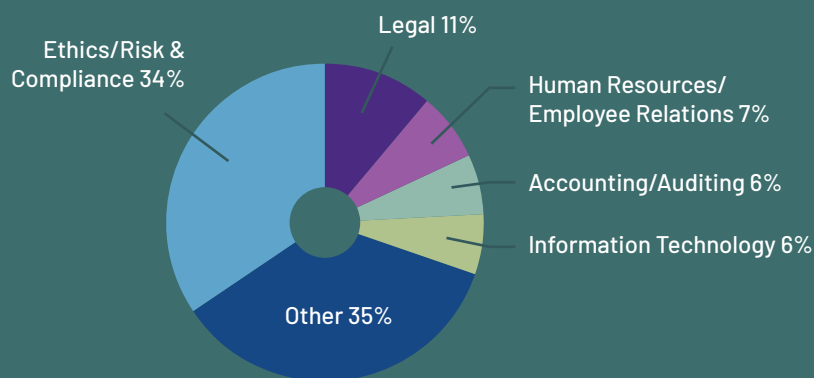
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1 <https://www.ethics.org/wp-content/uploads/2018/09/ECI-Framework-Final.pdf>

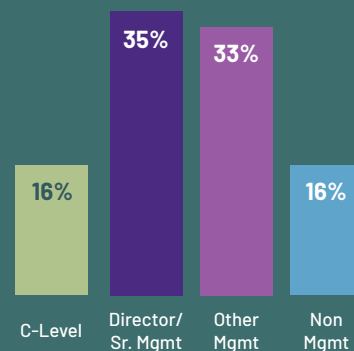


# A SNAPSHOT OF OUR SURVEY PARTICIPANTS

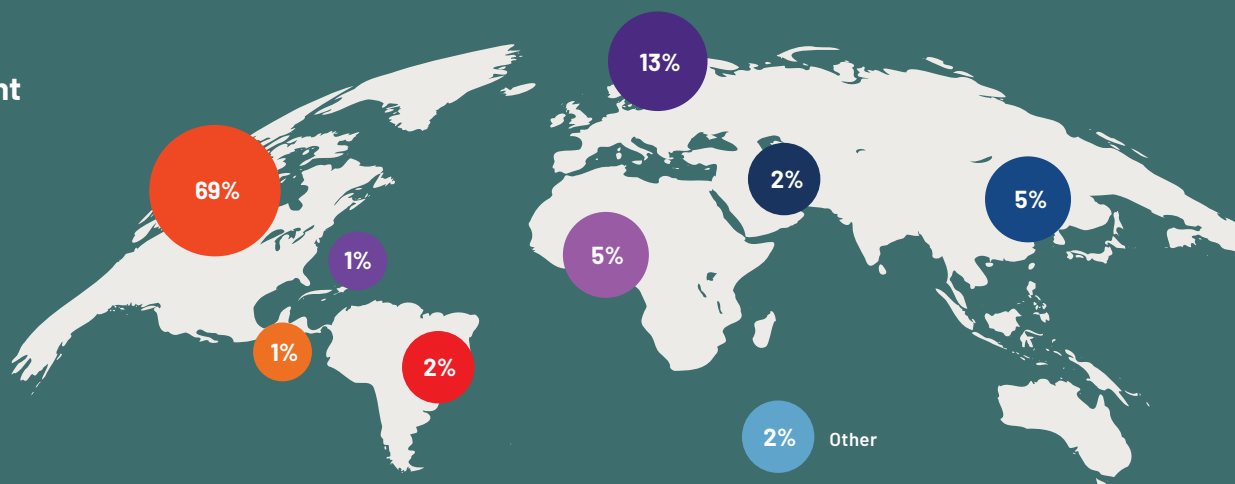
## Job Function



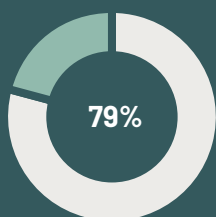
## Job Level



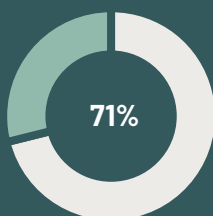
## Geographic Footprint (by Headquarters)



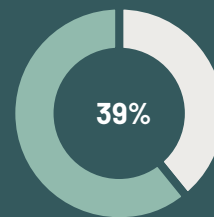
## Knowledge About



ETHICS & COMPLIANCE



RISK MANAGEMENT

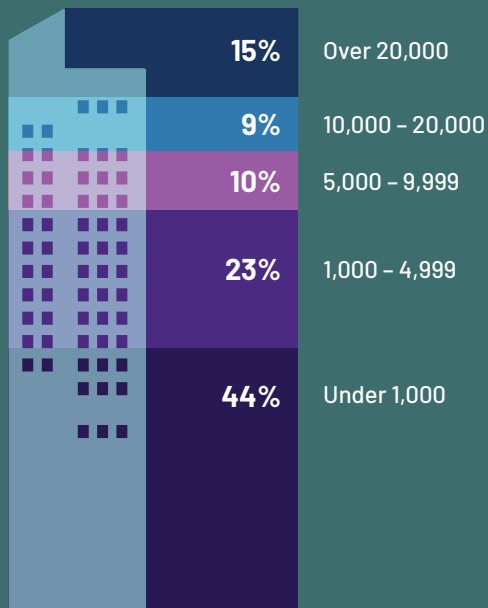


ENVIRONMENTAL,  
SOCIAL & GOVERNANCE

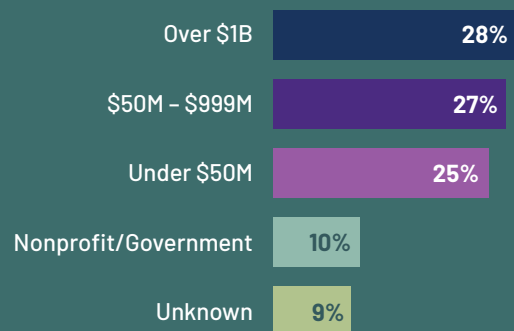


# A SNAPSHOT OF COMPANIES REPRESENTED

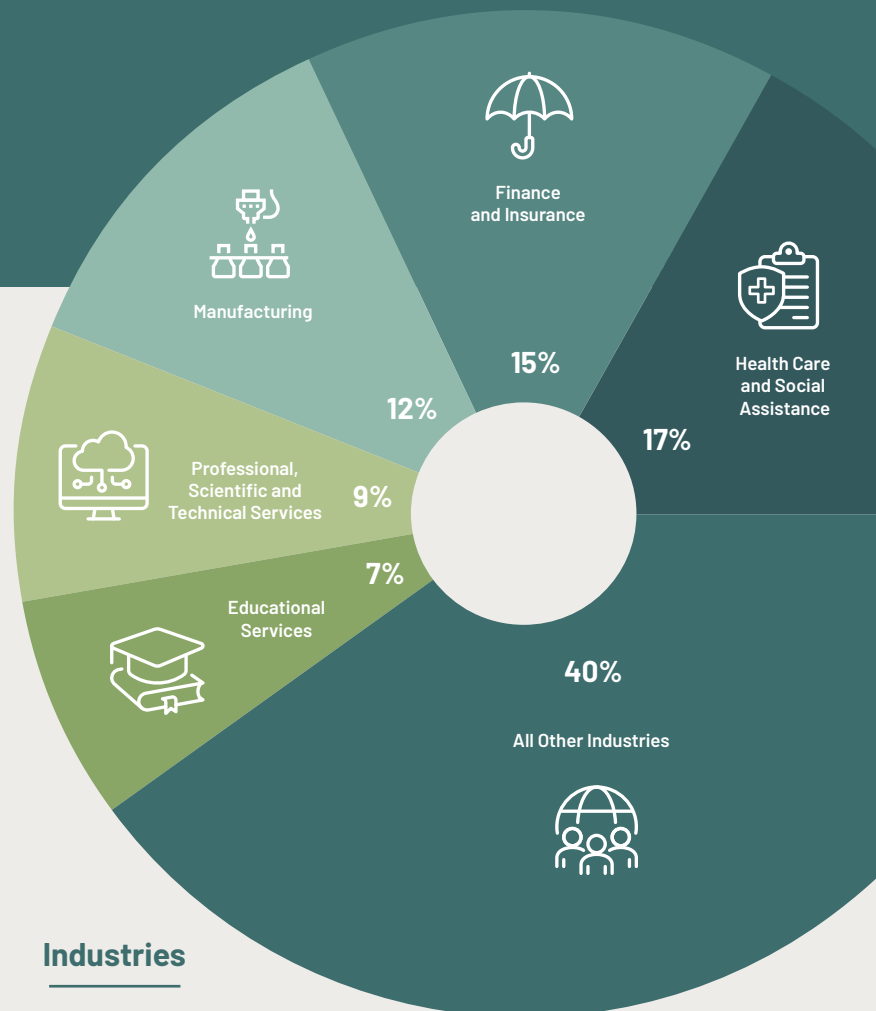
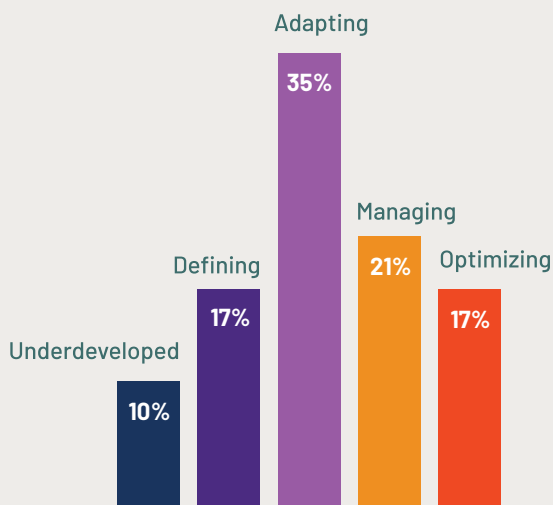
## Company Size (# of Employees)



## Annual Revenue (USD)



## Program Maturity



## Industries



# Executive Summary

The resilience of risk and compliance (R&C) leaders over these past couple of years has been remarkable. Our profession adapted amid the massive and sudden workplace shifts brought on by COVID-19, and by most accounts, maintained the efficacy of our programs by focusing on the core areas most important to managing risk. The 2022 edition of The Definitive Risk & Compliance Benchmark Report provides evidence of this resilience and dedication even as the world dealt with a second year of pandemic disruption.

This year's report is based on survey responses from more than 1,100 compliance professionals around the world. As in years past, it serves as a barometer for R&C programs as a whole and offers data on practices that organizations can use to improve their own performance in the future.

Among the key findings is evidence of greater confidence in how organizations will structure their workforces and locations going forward. Fully 95 percent of respondents indicate their organization has a plan to address post-COVID-19 work, whether it be in-person, hybrid or fully remote. The uncertainties of the pandemic may not be fully behind us, but there is evidence most organizations know how they will move forward.

It is also clear many compliance leaders will face relatively novel workforce dynamics that could present new cultural and compliance challenges. Considerations include: will high-performing, remote employees see themselves as passed over for career advancement versus peers with greater levels of in-person face time? R&C professionals must play an important role in ensuring that these new working models can still enable a culture of ethics, trust and fairness, no matter where an employee is located.

The structure of R&C programs across the board continues to take many forms. Non-compliance duties are still somewhat common for compliance personnel. And for 1 in 5 organizations, the function itself is split across multiple departments. As for executive leadership visibility to the impact of risk and compliance programs, only one-quarter of organizations have an independent compliance function reporting to the board and/or CEO.

This year, NAVEX leveraged both the U.S. Department of Justice Guidance for the Evaluation of Corporate Compliance Programs<sup>2</sup> and the High-Quality Ethics & Compliance Program (HQP) Assessment from the Ethics & Compliance Initiative (ECI) to frame the survey and characterize where programs stood on the maturity spectrum. Using the ECI-HQP guidelines, respondents self-reported their level of program maturity; from the "underdeveloped" to the most mature "optimizing." It was encouraging to see that nearly 2 in 5 programs considered themselves in the top two tiers of maturity, indicating that many organizations possess and/or focus on the HQP elements ECI encourages.

Still, 1 in 10 respondents self-reported that their organization was in the "underdeveloped" category. But even this can be interpreted as something of a positive finding – a level of self-awareness around opportunities to improve means the information in this report will present ample ideas and possible tools to help "underdeveloped" programs mature.

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2 <https://www.justice.gov/criminal-fraud/page/file/937501/download>



Notably, The ECI maturity model does not indicate a completion point or final goal line. Instead, it describes each stage of maturity as a journey of improvement and refinement. Even highly mature programs must be monitored and refined as market conditions, risk profiles, regulations, organizational growth and other factors come into play.

The results of this year's risk and compliance benchmark report survey highlighted several key areas that present both challenges for practitioners and opportunity to significantly increase the positive impact of their programs, specifically:

### **1 Risk assessments are conducted, but the results are not always put to best use.**

Risk assessments are a foundational element and an essential practice for all R&C programs, yet more than one-quarter of respondents (26 percent) did not report that their organization's risk assessment is either current or subject to periodic review. This alone is concerning. In addition, less than half (47 percent) said their assessments are informed by continuous access to operational data across the organization. A similar proportion said their risk assessment resulted in a risk-tailored resource allocation devoting greater time and scrutiny to higher-risk areas of the business. While this bodes well for roughly 50 percent of organizations who use their risk assessments effectively, it is problematic for the other half. The bottom line is that while many organizations are doing a good job in their risk assessments, a significant portion may be going through the motions but achieving less-than-optimal results.

### **2 Leadership commits to compliance but is challenged when facing competing priorities or business objectives.**

Roughly half of respondents (48 percent) indicate that their senior leadership and mid-level managers persisted in a commitment to compliance even when faced by competing interests and/or business objectives. This of course may mean that the other half fear this is not the case. Despite a strong majority of respondents who said leaders encourage compliance within their organizations, there is a sense that these same leaders fail to consistently model ethical and compliant behavior, which undermines the extent to which employees embrace those values themselves.

### **3 The focus on whistleblowing and non-retaliation by the regulators isn't matched by practitioner focus.**

The EU Whistleblower Directive is but one recent example of regulations across the globe that require organizations to enable and protect reporters of misconduct. In multiple areas of this report, respondents indicated a surprising lack of prioritization for this important function. Setting aside the possibility of regulatory response for a weak or ineffective system, a strong internal reporting (whistleblowing) program is a critical risk management function. Risk and compliance practitioners have long recognized it as "the canary in the coal mine" for detecting and addressing risks and patterns of misconduct. But this year's survey suggests focus on internal reporting – and the predictive value of this information in identifying and mitigating risk – is not as sharp as it could be. Further, organizations are not yet seeing value in proactively addressing the fear of retaliation in their organizations. Until this is addressed, a true speak-up culture is not possible.

**4 Regulations continue to drive R&C programs, but there is a disconnect on the fundamental need for an ethical culture to actually adhere to the regulatory requirements.**

When asked to indicate the importance of compliance issues to their organization, 66 percent of respondents rated regulatory compliance as being “absolutely essential.” Only 39 percent said organizational culture was “absolutely essential.” This disparity presents an opportunity – organizational culture is, of course, the major driver of ethical behavior. Organizations may want to consider whether they are sufficiently prioritizing culture in support of compliance.

**5 Clear ESG metrics and standards are not yet established, but this area is gaining attention from customers, employees, leadership and investors.**

More than half (56 percent) of respondents said their organization’s Environmental, Social and Governance (ESG) program has support from the CEO, and about the same share (53 percent) said helping their organization maintain social and environmental accountability was either “very important” or “absolutely essential” in their organization’s decision-making process. While this indicates ESG is poised for growth, nearly half (48 percent) of respondents said their organization does not use any frameworks or standards to measure ESG factors or disclose program performance. But among the other 52 percent of organizations, respondents indicate use of one or more of at least eight different frameworks in their reporting. Time will tell what standards and frameworks will emerge as ESG becomes a greater organizational priority.

This year’s survey should give risk and compliance professionals confidence about the positive impact their programs can and do have on the business. There is significant self-awareness about program maturity – where an organization’s program is today as it aspires to improve – even among those that are early in their development. It is also increasingly clear that helping executive leadership demonstrate support for compliance programs is fundamental to its success.

Finally, there is little doubt that performance against ESG metrics will have greater importance going forward. Intriguingly, many social and governance aspects of an organization’s behavior have been part of the compliance function long before the ESG acronym was coined. In relatively short order, it is quite possible ESG-related metrics and actions will become a natural extension of risk and compliance responsibilities.





# 2022 Key Findings



# The Lingering Impact of COVID-19

## Most Organizations Plan Workplace Changes

One of the biggest challenges for compliance programs is a dispersed workforce. COVID-19 caused significant disruption in work locations, with mixed decisions on return strategies. Our survey showed that 1 in 5 organizations whose employees continue to work remotely (22 percent) indicated they do not

plan to return to their pre-COVID-19 work location, with a similar proportion indicating they “don’t know.” (18 percent). This reflects an increase over last year in the proportion of organizations that have settled on the decision not to return, and a reduction in the share that remain unsure compared to 2021. Similar to last year, 3 out of 5 organizations whose employees continue to work remotely (60 percent) indicate they do plan to return to their pre-COVID-19 working location.

## Plan to Return to Pre-COVID-19 Working Location

More organizations are deciding not to return to pre-COVID-19 working location



BASE: ORGANIZATION'S EMPLOYEES CONTINUE TO WORK REMOTELY (n=946)  
Does your organization plan on eventually returning to its pre COVID-19 working location (i.e., returning to work in-person)?



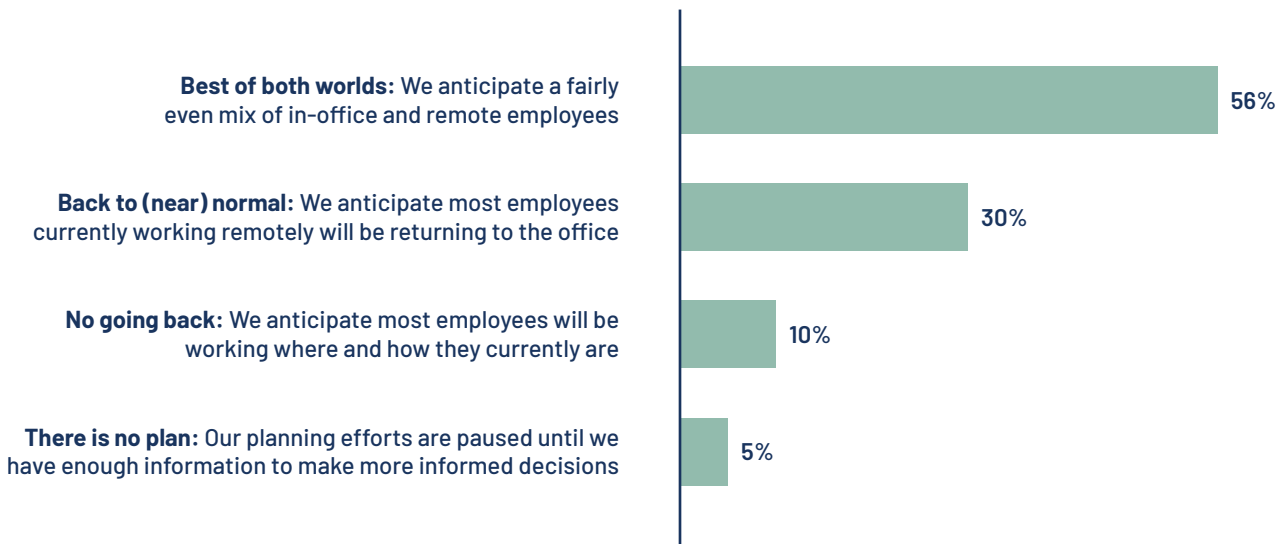
Continuing the trend of workplace disruption, after many organizations had no choice but to pivot to remote and hybrid work amid the rise of the COVID-19 pandemic, more than half of those whose employees continue to work remotely (56 percent) indicated they have chosen to continue with a mix of on-site and remote workers indefinitely.

These trends present an enduring challenge for leaders who must ensure they are reaching employees no matter where they are. Hybrid work creates unique challenges around culture – for

example, the asymmetrical nature of some employees meeting in a conference room while others appear on a video feed. Those who are consistently remote and “Zoomed” into a meeting may feel less engaged. As the primary driver of nurturing an ethical and “speak up” workforce, leaders will need to assess these trends as expressed through their organization’s reporting systems. Then, consider how to address this perceived imbalance within their corporate culture going forward.

## Post-Pandemic Work Policy Planning

### Most expect a hybrid workforce



BASE: ORGANIZATION'S EMPLOYEES CONTINUE TO WORK REMOTELY (n=946)  
Which of the following best describes your organization's post-pandemic hybrid/remote work policy planning?

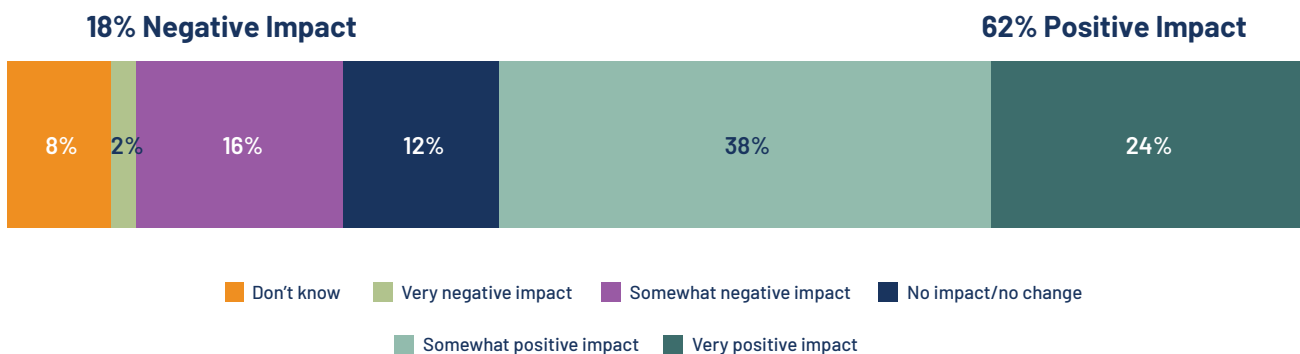


Despite those challenges ahead, hybrid and remote work appears to be promoting some positive cultural tailwinds – almost two-thirds of organizations whose employees continue to work remotely (62 percent) said the shift to work-from-home has been positive for their culture overall. This new workplace dynamic may also be playing a role emboldening whistleblowers. This past year saw an all-time high in the rate of named reports, according to [NAVEX's 2022 Hotline Incident Management Benchmark Report](#).



## Impact Work-From-Home Models had on Workplace Culture

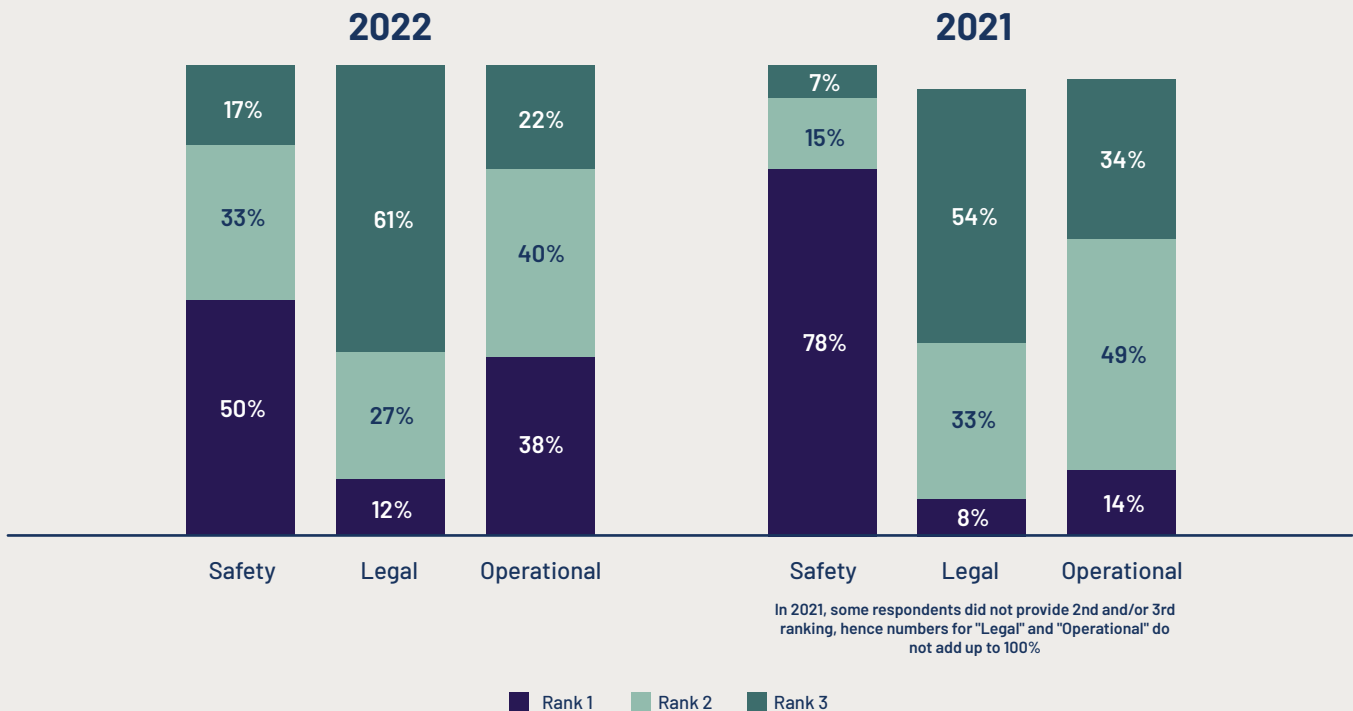
Most organizations report positive cultural impact from remote work



BASE: ORGANIZATION'S EMPLOYEES CONTINUE TO WORK REMOTELY (n=946)  
How much of a positive or negative impact have work-from-home models had on your workplace culture overall?

## Ranking 'Importance to Return to Work In-Person' Decision Making

Organizations are thinking more about operational concerns in 2022



BASE: ORGANIZATION'S EMPLOYEES CONTINUE TO WORK REMOTELY (n=946)

Which considerations are most important to your organization's return to work in-person (i.e., pre-COVID-19 work conditions) decision making?  
Please rank each of the following considerations from "1," being most important, to "3" being least important.

### Operational Concerns Are on the Rise

As the majority of organizations plan to return to some form of in-person work – be it hybrid or full-time – the priorities around charting that return have shifted to include a greater focus on operational concerns.

As in 2021, "safety" remained the top concern for a return in 2022. Half of organizations whose employees continue to work remotely ranked it

as most important versus "operational" and "legal" concerns. Yet this was a significant decrease from 2021, when more than 4 out of 5 organizations (78 percent) ranked "safety" at the top.

Reflecting the greater focus on the actual operations of the workplace, the share of organizations ranking "operational" as the top concern leapt from 14 percent in 2021 to nearly 40 percent in 2022.

## Level of Compliance Disruption Due to COVID-19 is Low

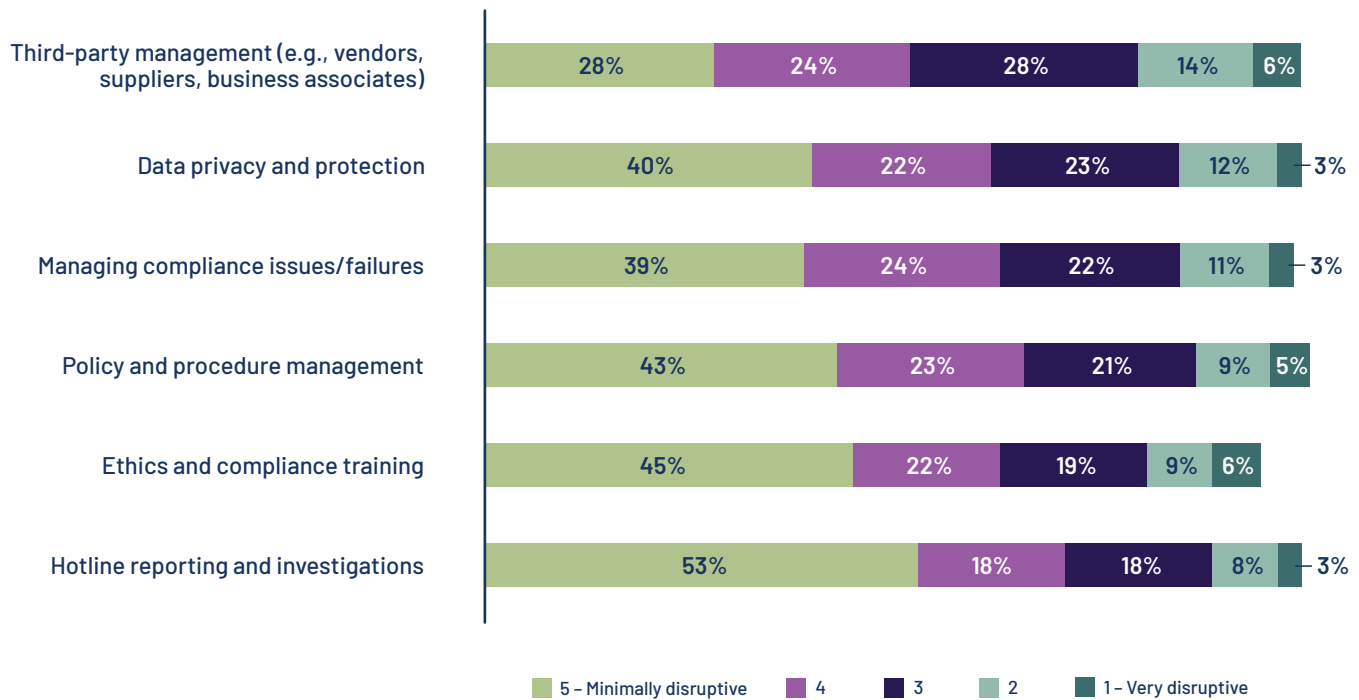
When the COVID-19 pandemic first emerged, Compliance faced the question of whether the related workplace shifts would make tasks like investigations a greater challenge. The 2022 data indicates that the pandemic continues to be minimally disruptive to the majority of risk and compliance initiatives.

The most disrupted category was third-party risk management, with a combined 20 percent of respondents indicating the pandemic had either a “somewhat” or “very disruptive” impact.



## Level of COVID-19 Disruption

COVID-19 continues to be minimally disruptive to risk and compliance



BASE: ALL QUALIFIED RESPONDENTS (n=1,105)  
How disruptive has the COVID-19 pandemic been to each of the following?

## Leadership Has Opportunity to Improve Commitment to Compliance

### Most Boards Receive Compliance Reports, but May Lack Context

While most boards of directors receive periodic reports on compliance matters, fully 3 out of 10 do not. To see such a low level of board engagement with Compliance is surprising and inconsistent with U.S. Department of Justice guidelines, as is the fact that just under half of boards (48 percent) examine compliance data when exercising oversight. Organizations should review the level of board engagement with Compliance and take

appropriate actions to ensure that the board knows and understands their responsibilities in program oversight. This is something that could stand out in the case of an investigation or lawsuit.

There is also some question as to whether boards possess sufficient context to interpret the compliance reports they do receive. Respondents indicated that only 40 percent have board members with compliance experience or expertise. And an even smaller share of boards (36 percent) hold executive and/or private sessions with Compliance.

### Boards of Directors' Role

Boards are receiving periodic reports – but may lack the context to effectively interpret them



\*In 2021 this question was not asked of all respondents.

BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

Which of the following are true about your organization's board of directors? Please select all that apply.

# Managers, Senior Leadership Struggle with Competing Priorities

More than three-quarters of respondents indicated that their senior leadership (78 percent) and middle management (77 percent) encourage a commitment to compliance within the organization. However, this proportion drops to roughly half when asked if this commitment persists in the face of competing interests and/or business objectives.



## Senior Leadership Role

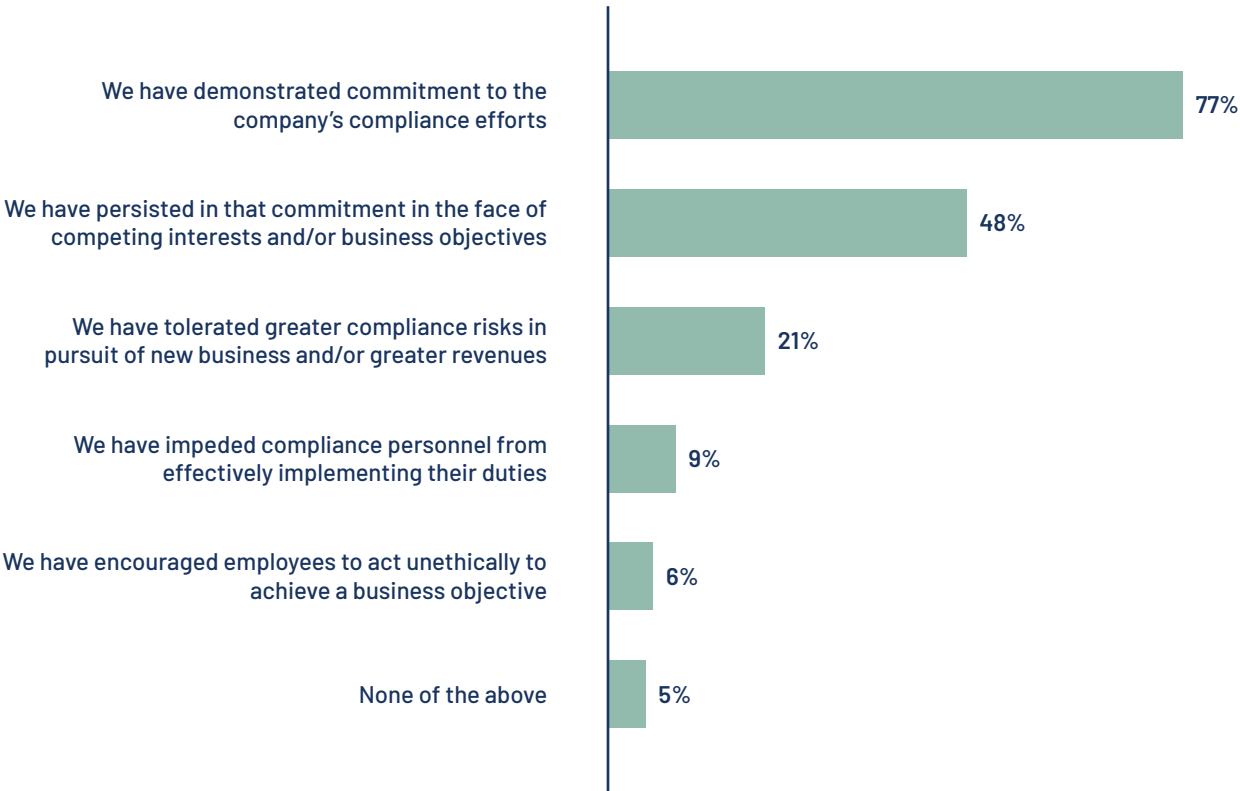
Leadership shows commitment to compliance – but doesn’t always persist in that commitment



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)  
Which of the following statements are true about your organization's senior leadership? Please select all that apply.

# Management Role

Less than half of managers persist in their commitment to compliance in the face of competing interests and/or business objectives



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)  
Which of the following statements are true about your organization's managers? Please select all that apply.

For roughly half of the organizations represented in this study, there is a disconnect between words and actions. Compliance officers in organizations that fall in this category have an opportunity to open a discussion with leadership about the challenges leaders face and how to bridge this gap.





### Inconsistent Use of Data in Risk Assessments & Strategy

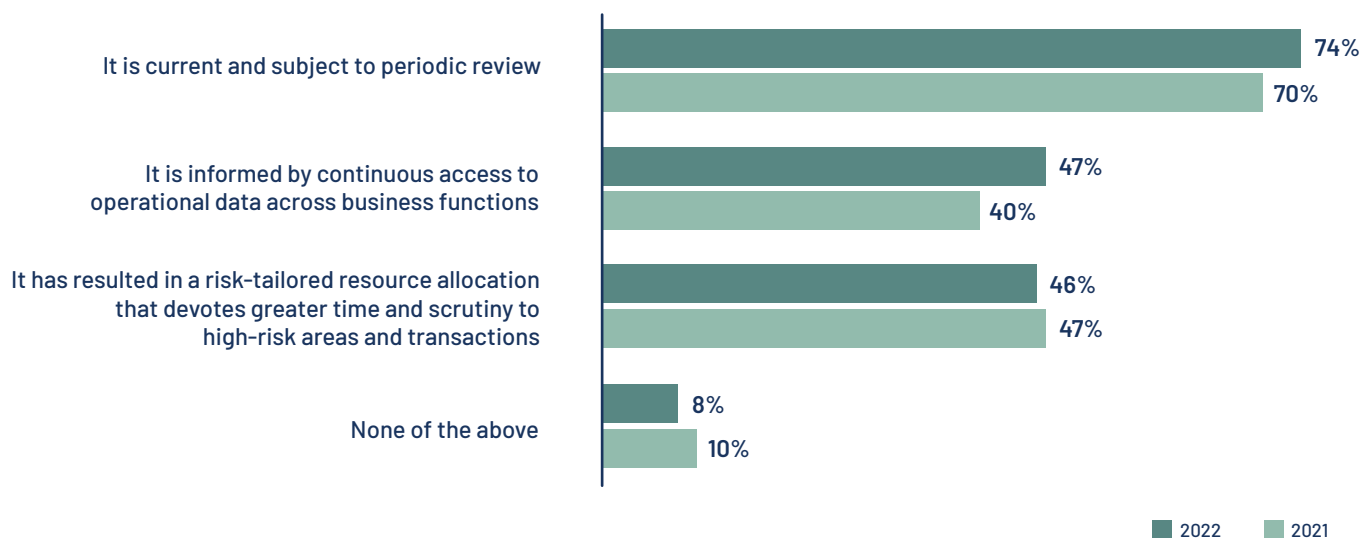
There is significant conversation about the importance of building compliance programs on a strong foundation of risk assessment, including guidance from the U.S. Department of Justice. This guidance also expects that compliance officers have access to cross-functional risk data. Yet fewer than half of respondents whose organization uses risk assessment results (47 percent) indicated they have access to operational data across functions to inform their risk assessments.

In addition, fewer than half of the respondents (46 percent) indicated that cross-functional risk data resulted in a risk-tailored resource allocation that devotes greater time and scrutiny to high-risk areas and transactions.

This finding comes despite three-quarters of organizations (74 percent) saying they possessed a current risk assessment subject to periodic review. The difference suggests that some organizations are completing risk assessments that are not as impactful as they could be.

### Organization Risk Assessment

Risk assessments are being done, but not consistently used to inform programs

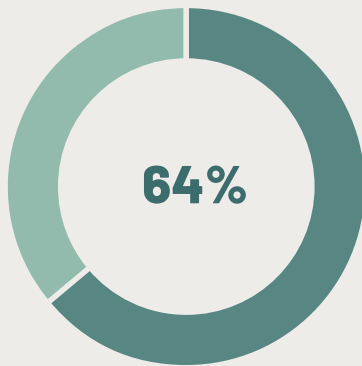


BASE: ORGANIZATION USES RISK ASSESSMENT RESULTS (n=628)

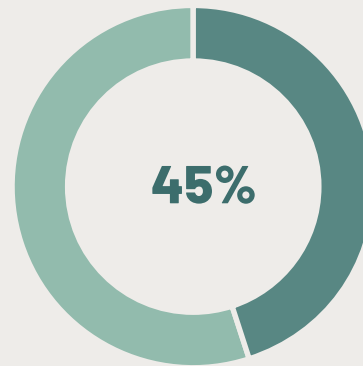
Which of the following are true about your organization's risk assessment? Please select all that apply.

## Information Sources Used to Review Test & Improve R&C Program

Only 64% use lessons learned and only 45% use culture measures to test and improve their programs



Percent of respondents reporting using lessons learned from misconduct (own and/or peers) to review, test and improve risk and compliance programs.



Percent of respondents reporting using measures of the organization's culture of compliance to review, test and improve risk and compliance programs

BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

Which of the following information sources does your organization use to review, test and improve your risk and compliance program?  
Please select all that apply.

## Measuring Misconduct & Culture as a Risk Signal

When it comes to information organizations leverage to review, test and improve their risk and compliance programs, two factors stood out. More than 60 percent of organizations said they use lessons learned from misconduct to improve their programs. This means nearly 40 percent of organizations do not, despite the value this information provides in identifying risk.

Also of note was that nearly half (45 percent) use measures of their organization's culture of compliance to review, test and improve their programs. Organizational culture is likely the strongest driver of behaviors, and this measure, while potentially subjective, is an important risk factor to consider in measuring program effectiveness.

## Varied Sources for Program Audits

Effective program reviews consider multiple sources of data, and our survey found that organizations do use a variety of sources for program audits. Of those who use compliance program audits, more than 4 out of 5 (84 percent) review their compliance policies, procedures and practices to ensure they

are applicable for particular business units. Most also audit internal investigation reports and incident reports from their hotline/whistleblower programs. It is notable, however that 30 percent do not use incident reports from hotline/whistleblower programs as a source of data. Control testing, post-training employee interviews or testing, training data and gap analysis were also an audit component for more than half of organizations.

## Organization R&C Program Audits

Organizations use a variety of sources for program audits

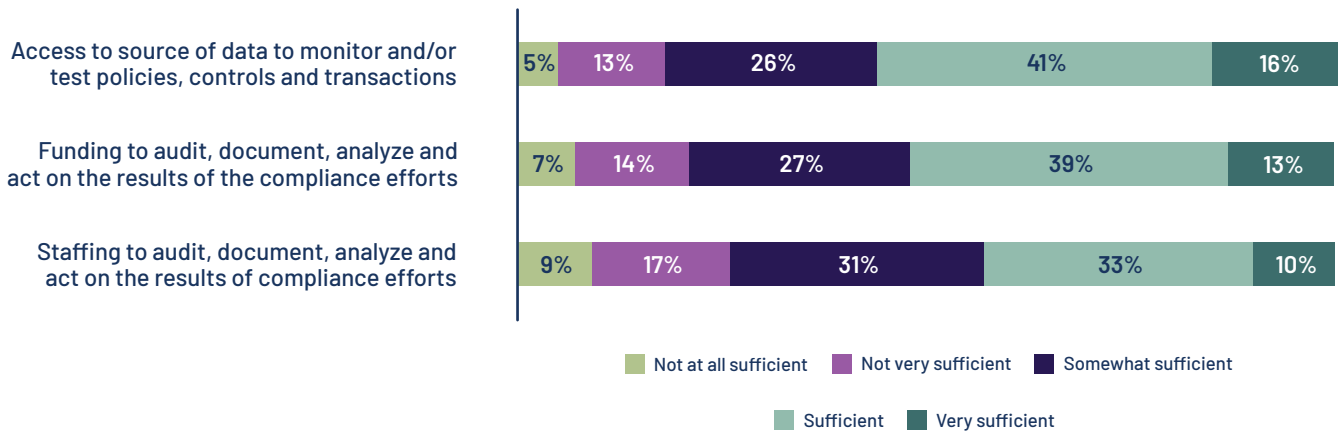


BASE: ORGANIZATION USES COMPLIANCE PROGRAM AUDITS (n=582)

Which of the following are part of your organization's R&C compliance program audits? Please select all that apply.

## Organization Program Access

Organizations have generally sufficient access to data, funding and staffing



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)  
 How would you rate your organization's program access to each of the following?



## Programs Have Generally Sufficient Access & Resources

Consistent with last year, respondents indicate their programs have sufficient access to resources. The vast majority of organizations (83 percent) said they have sufficient access to sources of data to monitor and/or test policies, controls and transactions.

Nearly 4 in 5 respondents (79 percent) indicated programs were at least “somewhat sufficiently” funded for auditing, documenting, analyzing and acting on results of compliance efforts. Three-quarters of respondents (74 percent) indicated staffing was at least “somewhat” sufficient, or better, to meet program objectives.

## Regulatory Compliance Is a Top Priority

### Regulatory Compliance Ranks First Among Several Important Issues

Two-thirds of respondents (66 percent) listed regulatory compliance as “absolutely essential” to their organization. Data privacy, protection and security ranked similarly high. Given the prominence of data privacy regulations such as GDPR in the European Union, this is not surprising.

It is, however, surprising to see only 43 percent of organizations indicate whistleblowing, reporting and retaliation to be “absolutely essential” in a regulatory protection environment that is becoming increasingly

stringent – the most prominent example being the EU Whistleblower Directive. Many organizations face a number of regulations around whistleblower protection, which is a top priority for many governments.

As a recurring finding in this report, organizations should be mindful to assess whether they are devoting sufficient attention to whistleblower and non-retaliation requirements in the jurisdictions where they operate. Also, noting that fear of retaliation is one of the primary reasons why employees do not report suspected wrongdoing, all levels of the organization need to be trained to prevent and recognize retaliatory behavior.

### Importance of Compliance Issues to Organization

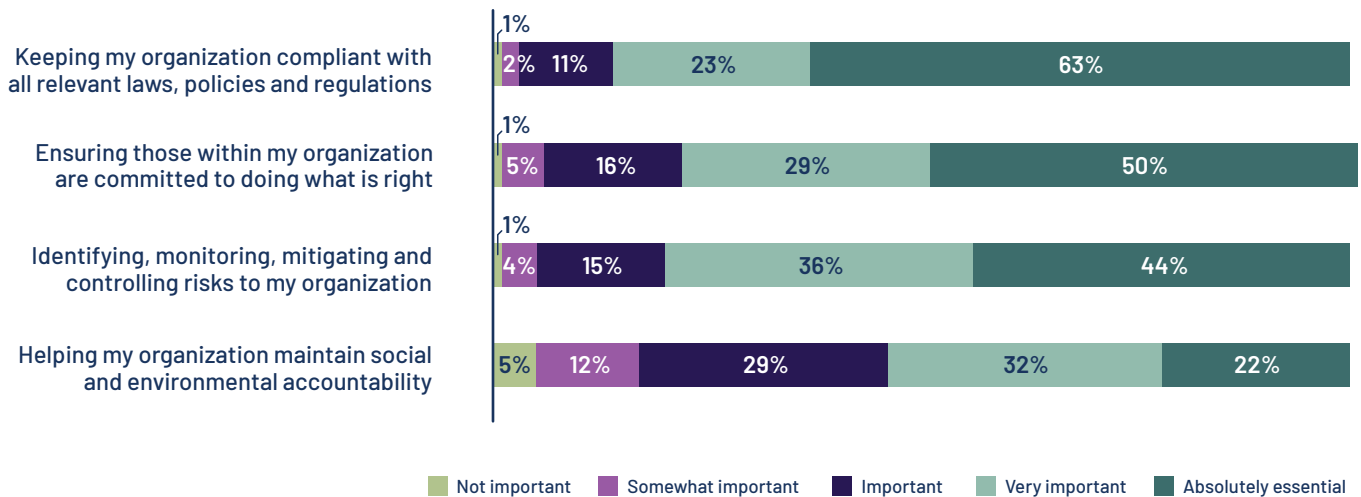
Regulation, data security top compliance issues for organizations; whistleblowing, reporting and retaliation below 50 percent



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)  
How important are the following compliance issues to your organization?

## Importance to Organization Decision-Making

### Regulatory compliance leads the decision-making process



BASE: ALL QUALIFIED RESPONDENTS (n=1,105)

How important are the following considerations to your organization in its decision-making process?

When asked about the importance to organizational decision making, the vast majority of respondents (86 percent) indicated that “keeping my organization compliant with all relevant laws, policies and regulations” was “very important” or “absolutely essential”.

## Compliance Automation Advances

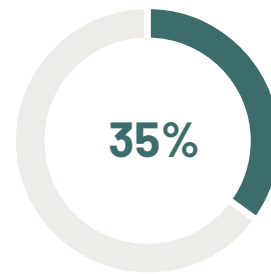
The most prominent reasons for adopting risk and compliance automation and technology were to “reduce risks” and to “meet regulatory requirements.”

Over a third of respondents (38 percent, 35 percent respectively) indicated these two dimensions best characterized the priorities of their program.

Achieving greater operational efficiency across a number of dimensions is the next most prominent driver of program automation. Roughly 1 in 5 of respondents chose “streamline workflows/reduce redundancy” (23 percent), “automate practices and procedures” (22 percent) and/or “reduce spent time on managing risk and compliance tasks” (20 percent) as key motivations for adopting automation technology.



These advancements enable compliance leaders more face time within their organizations, allowing them to do things that cannot be done with technology such as strategic planning with leadership, conducting investigations and positively influencing organizational culture.



Percent of respondents indicating they are adopting technology to meet regulatory requirements

## Reasons for Adopting New R&C Automation & Technology Solutions

Reducing risk and meeting regulatory requirements are top reasons for adopting automation and technology



BASE: ALL QUALIFIED RESPONDENTS (n=1,105)

What are your organization's reasons for adopting new Risk & Compliance automation and technology solutions? Please select up to three options.

## 5 Risk & Compliance Responsibilities Still Reside in Multiple Functions

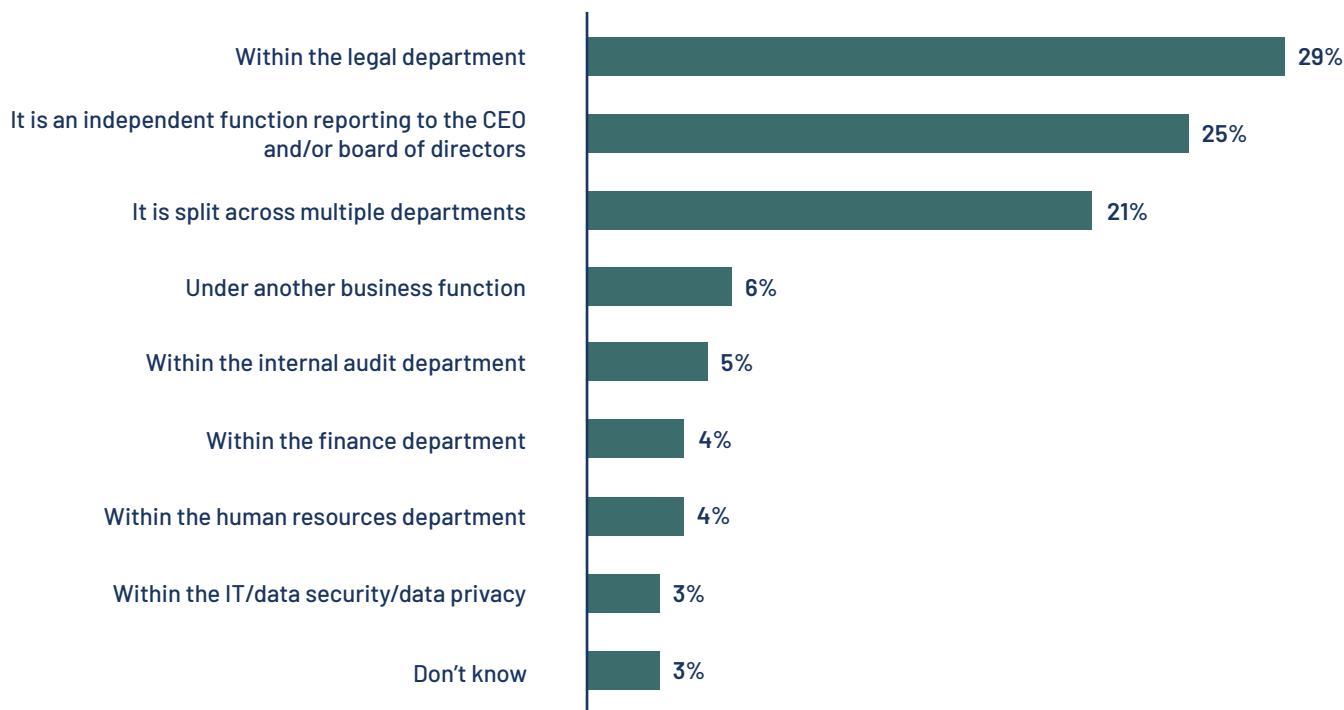
### No 'One-Size-Fits-All'

Survey findings continue to show that compliance program structures are not standardized across organizations.

Most frequently, and representing about 3 in 10 organizations, the compliance function reports within the legal department. An independent compliance function reporting directly to the CEO and/or board is the next most common.

One-fifth of organizations (21 percent) have compliance split across multiple departments. This is not necessarily a bad strategy if approached prudently. This model is often driven by subject matter expertise. The key is for the scope of responsibility for each function to be clearly documented and allocated, and for those roles to come together on a regular basis. Splitting the compliance function across multiple departments adds risk that some issues could be missed, i.e., when everybody is in charge, nobody is in charge.

### Department Where Compliance Function Resides Organizational structure is still not standardized



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)  
Where is your organization's compliance function housed?

## Ownership of Risk Integration Remains Unstandardized

Respondents indicate that risk integration, both strategy and implementation, is spread across multiple functional areas.

Our survey revealed that responsibility for risk integration strategy spread out over different corporate roles, with a significant portion of respondents (8 percent) indicating no one in the organization is responsible for this function.

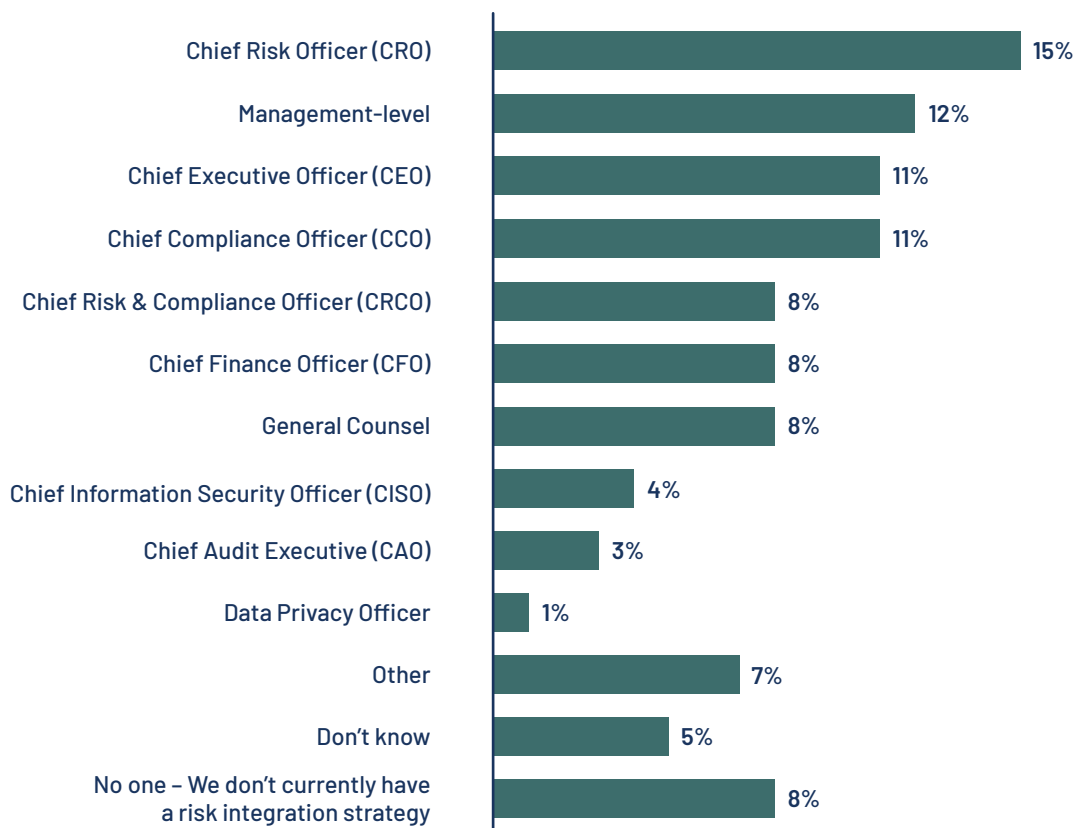
Respondents indicated the most common “owner” of risk integration is the chief risk officer (15 percent). But this designation is closely followed by “management,” “CEO” and “CCO” (12, 11, 11 percent, respectively).

The data indicates that integrated risk management has a high strategic value, as most respondents indicated it was the responsibility of executive management.

Interestingly, almost one in ten respondents said that no one owns the risk integration strategy within their organization – which is the least ideal approach.

## Responsible for Managing Risk Integration Strategy

Ownership of risk management responsibility is spread across functions



BASE: KNOWLEDGEABLE ABOUT RISK MANAGEMENT (n=790)  
Who in your organization is responsible for managing risk integration strategy?

# Most Compliance Professionals Are Qualified & May Hold Other Responsibilities

The data indicates that nearly half of compliance professionals (44 percent) also have non-compliance responsibilities within their organization.

That said, the data also shows respondents believe a significant majority of compliance professionals (75 percent) are qualified for their duties, and more than 60 percent receive periodic training and professional development.

Finally, it appears that compliance has a relatively low turnover rate, with only 8 percent of respondents suggesting otherwise. As a role with ample opportunity to positively impact the lives of coworkers and the community, this level of retention comes as no surprise.



## Compliance Personnel Qualifications & Responsibilities

44 percent have responsibilities beyond compliance



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)  
Which of the following statements apply to your organization's compliance personnel? Please select all that apply.

## 6 Program-Specific Elements

### Ethics & Compliance Program Maturity

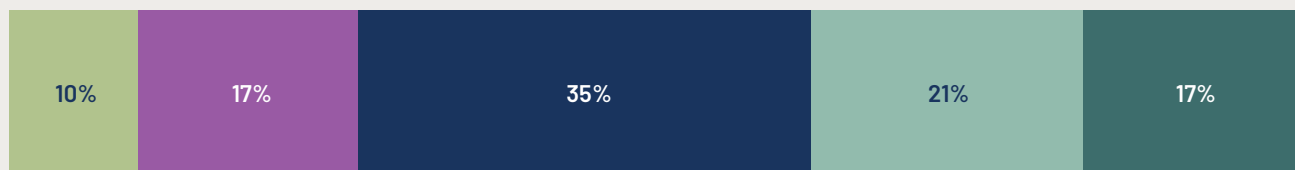
#### Some Mature Programs & Some with Room to Improve

Nearly 2 in 5 respondents (38 percent) self-reported their risk and compliance program maturity was either “managing” or “optimizing” – the top two tiers of program performance. Even for the 10 percent self-reporting at the lowest end of the maturity spectrum, this determination is still a good self-assessment and a starting point to move toward a more mature and effective program.



### R&C Program Maturity

Maturity self-reporting shows range of maturity levels across organizations



- Underdeveloped:** It is new and/or lacks many high-quality program (HQP) elements
- Defining:** It has a few HQP elements, but still lacks many important attributes
- Adapting:** It contains a number of HQP elements reflecting some important attributes, but with room to further mature
- Managing:** It contains many HQP elements and can be considered effective or good, but not a HQP that is managed well
- Optimizing:** It contains the majority of, if not all, HQP elements

BASE: ALL QUALIFIED RESPONDENTS (n=1,105)  
Which of the following statements best describes your organization's Risk & Compliance program?

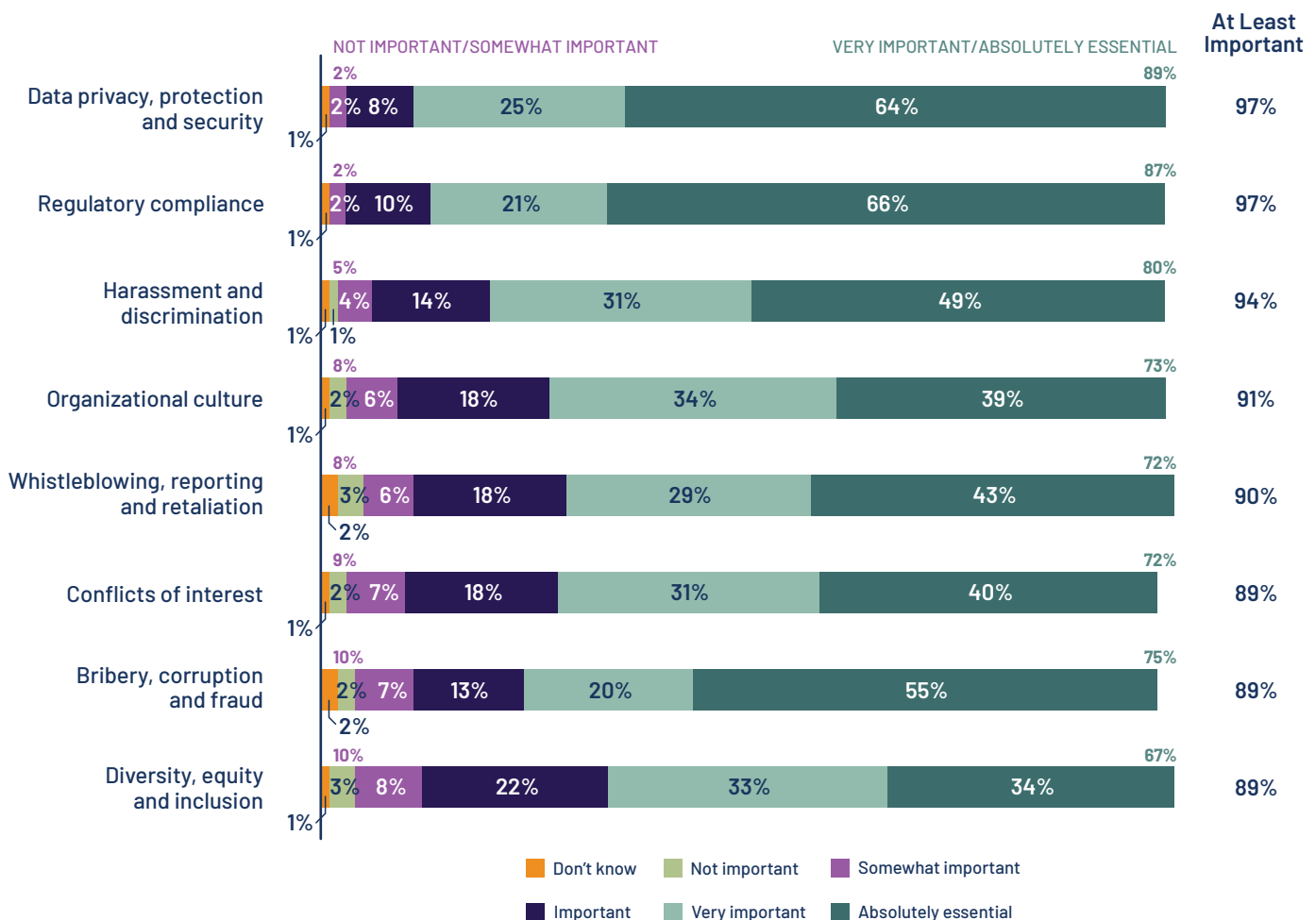
## Whistleblower Reporting Lags

As referenced earlier in this report, only 2 of 5 respondents said whistleblowing, reporting and retaliation was “absolutely essential” to their organization’s compliance program. This core risk and compliance function is not only critical for a well-functioning incident management program,

but factors into a host of regulatory requirements. It is critical for employees to have a variety of channels to report a concern or ask a question, and to also feel that they are protected from retaliation. Organizations have an opportunity to put more high-level focus on this issue.

## Importance of Compliance Issues to Organization

Whistleblower reporting lower in importance to organizations



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)  
How important are the following compliance issues to your organization?



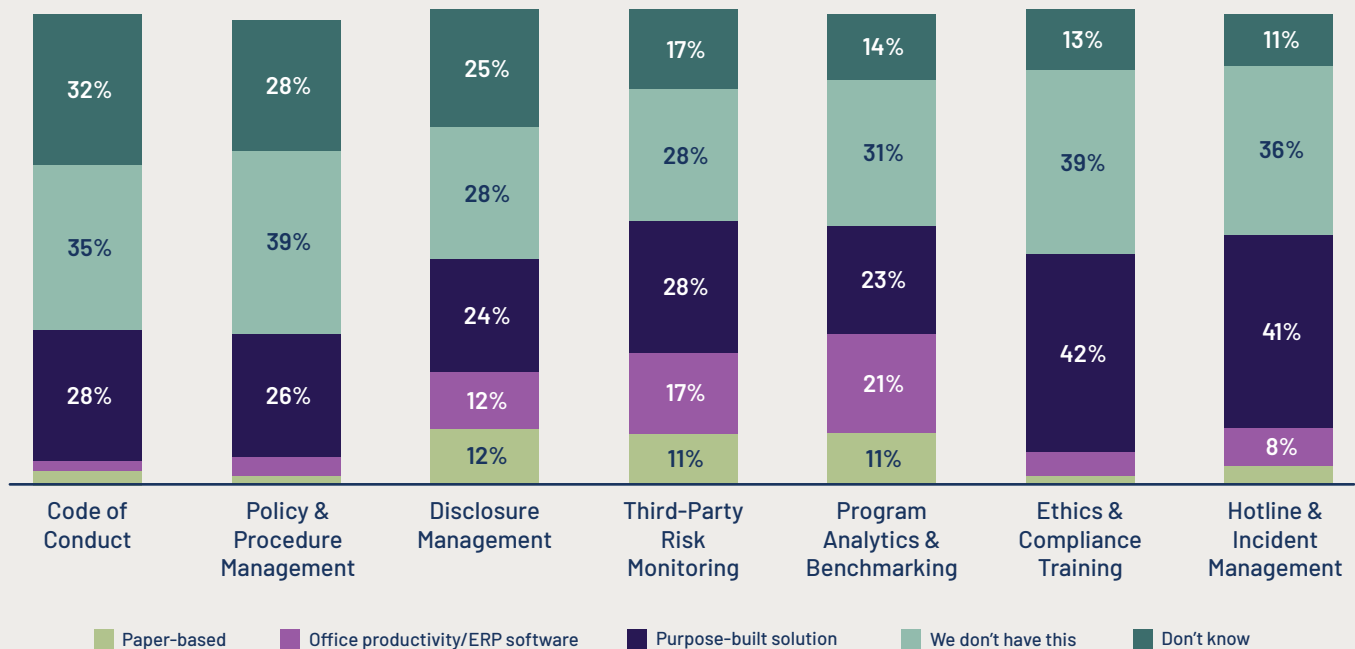
### Variety of Approach & Inconsistent Use of Technology to Administer Program Components

The majority of respondents (more than 50 percent across each component measured) said they use software to administer the various elements of their risk and compliance programs. Policy and procedure management tops the list, with 65 percent

of respondents indicating they use either office productivity/Enterprise Resource Planning (ERP) software or a purpose-built solution to automate this function.

Despite this trend toward automation, paper-based elements are still all too common, with 32 percent of codes of conduct and 28 percent of policy and procedure management elements still hard-copy based.

### Administration of R&C Program Elements Variety of approaches and inconsistent use of technology



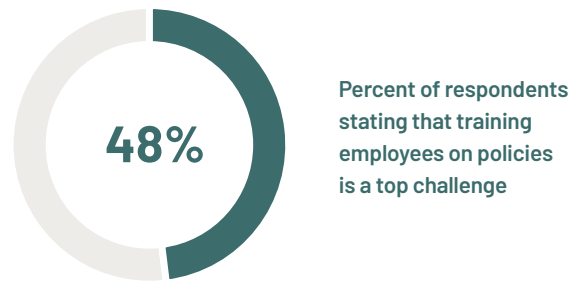
BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)  
How does your organization primarily administer the following Risk & Compliance program elements?

# Policy & Procedure Management

## Training on Policies is Top Challenge

It can be a challenge to deploy necessary training to employees, especially in highly regulated industries with many policies and procedures that must be followed. Nearly half of respondents selected “training employees on policies” as one of their top-three challenges. Two out of 5 said “aligning policies with changing regulations” was a top challenge, and roughly

one-quarter indicated that “creating and updating documents easily,” “managing version control and redundancy,” and/or “providing easy access to policies and procedures” was a top challenge.



## Top Policy Management Challenges

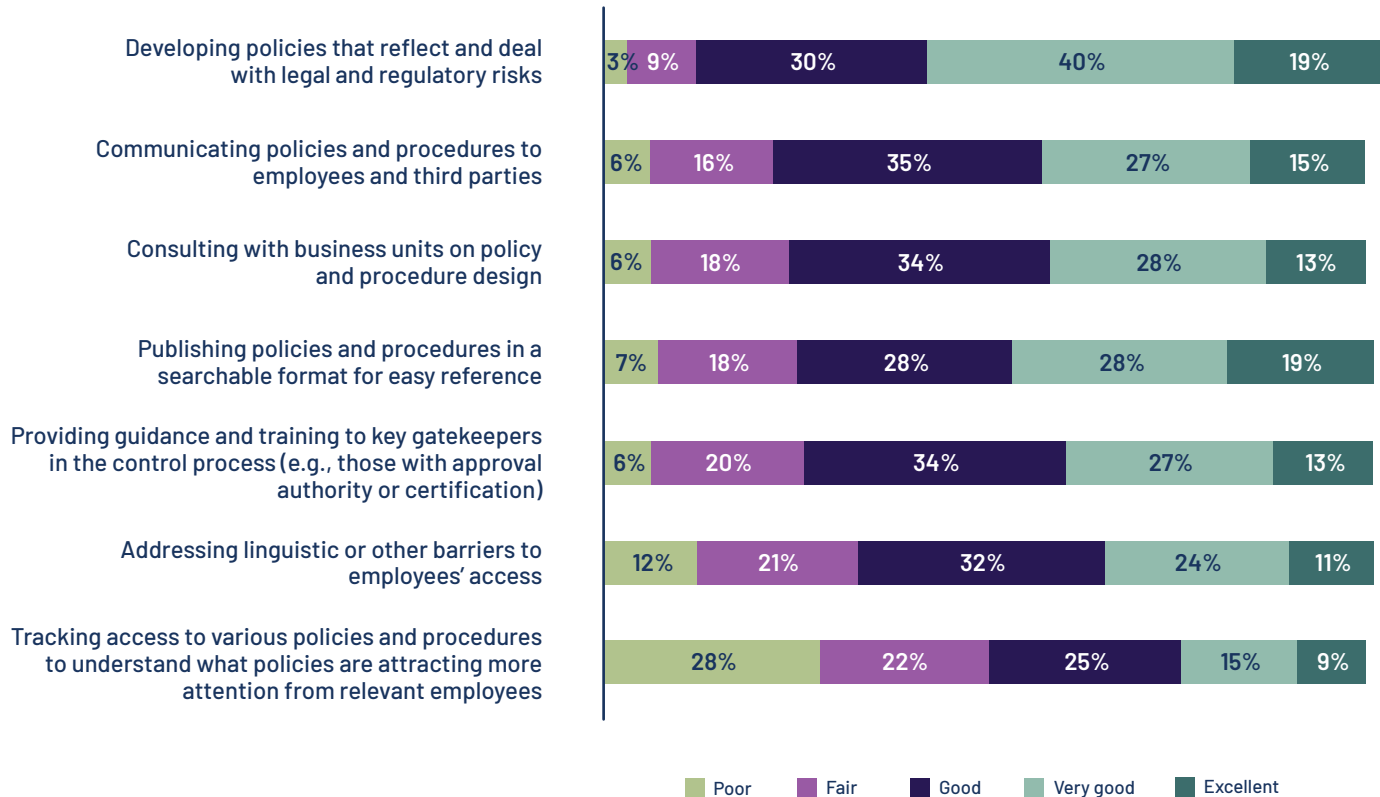
Training employees and aligning policies with regulations are top policy challenges



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)  
What are your organization's top policy management challenges? Please select your top three challenges.

## Rating Organization's Compliance Program's Performance in Terms of Policy & Procedure Management

Half of respondents report poor or fair performance in tracking access to various policies



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

How would you rate your organization's compliance program's performance in the following areas of policy and procedure management?

### Tracking Access to Policies Lags as Performance Area

Respondents indicated their organizations were competent at developing policies that address legal and regulatory risks, with nearly 9 out of 10 (89 percent) saying they were at least "good" in this area.

On the other hand, half of organizations rated themselves as "fair" or "poor" in tracking access to policies and procedures to understand what is attracting more attention from relevant employees. This comes despite guidance from the U.S. Department of Justice that the ability to track access to policies is an effectiveness indicator that all organizations should measure.

When it comes to measuring effectiveness of a policy management program, the data shows nearly one-third of programs (31 percent) do not use metrics at all. Policy and procedure management is a program area where measuring effectiveness can be a challenge, but tracking access to policies is a step in the right direction.



## Metrics Used to Measure Effectiveness of Policy Management Program

Nearly one-third of programs do not use metrics to measure policy and procedure management effectiveness



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

Which metrics does your organization use to measure the effectiveness of its policy management program? Please select all that apply.

## Ethics & Compliance Training

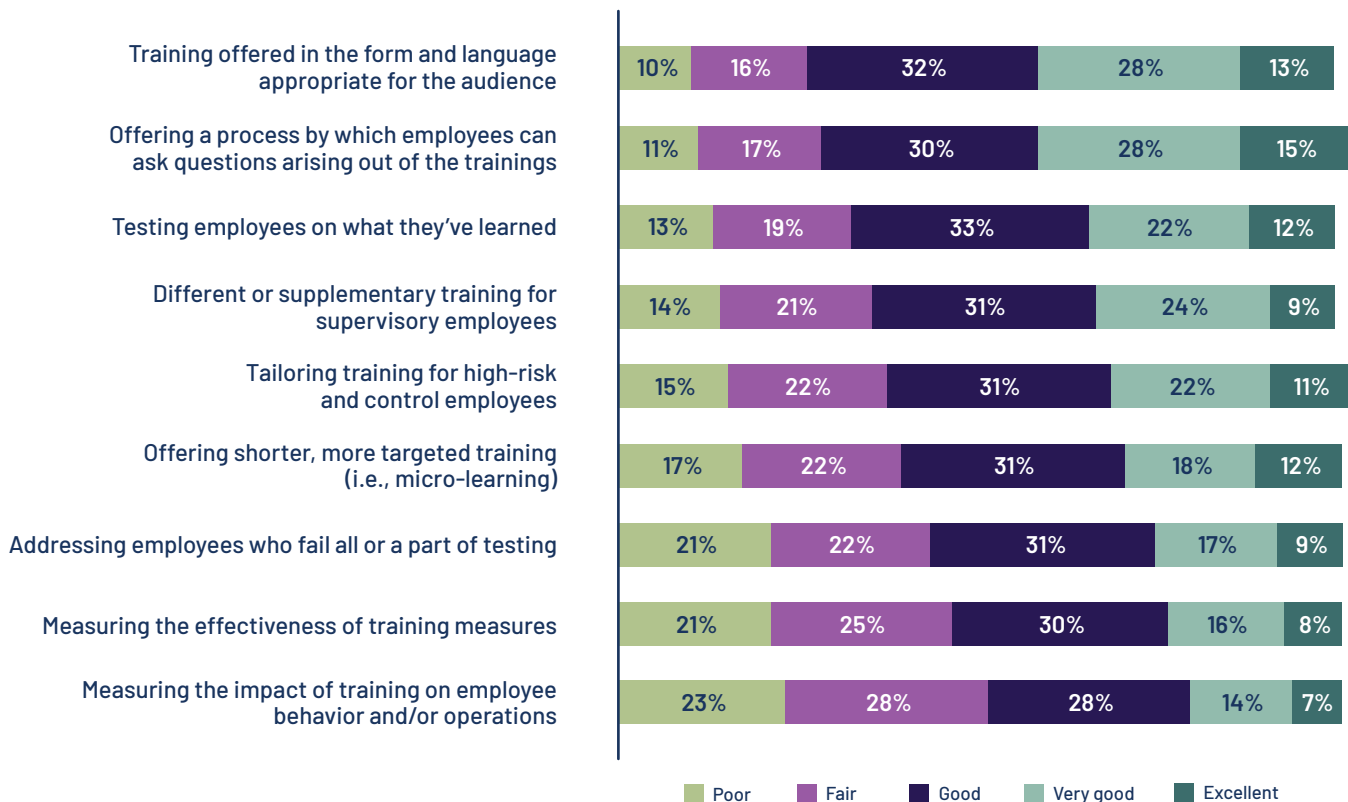
### Many Cite Weak Protocols when Employees Fail Testing

More than 2 in 5 respondents (43 percent) rated their organization as either “fair” or “poor” in addressing employees who fail all or part of required testing on training content. This question directly addresses an expectation from the U.S. Department of Justice guidance and is one the industry is debating how to best address.

One thing we know is that the solution should go beyond focusing on just individuals. What may be useful is visibility to larger trends. For example, if an entire department does poorly in a given training assessment, it could present an opportunity to address systemic issues within that department. In the end, the purpose of training is to impact behaviors which, as the survey showed, are also difficult to measure.

### Rating Organization’s Performance in Terms of Ethics & Compliance Training

2 in 5 report weak response when employees fail at training



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

How would you rate your organization’s compliance program’s performance in the following areas of policy and procedure management?

### Risk Assessments Could Align Better with Training

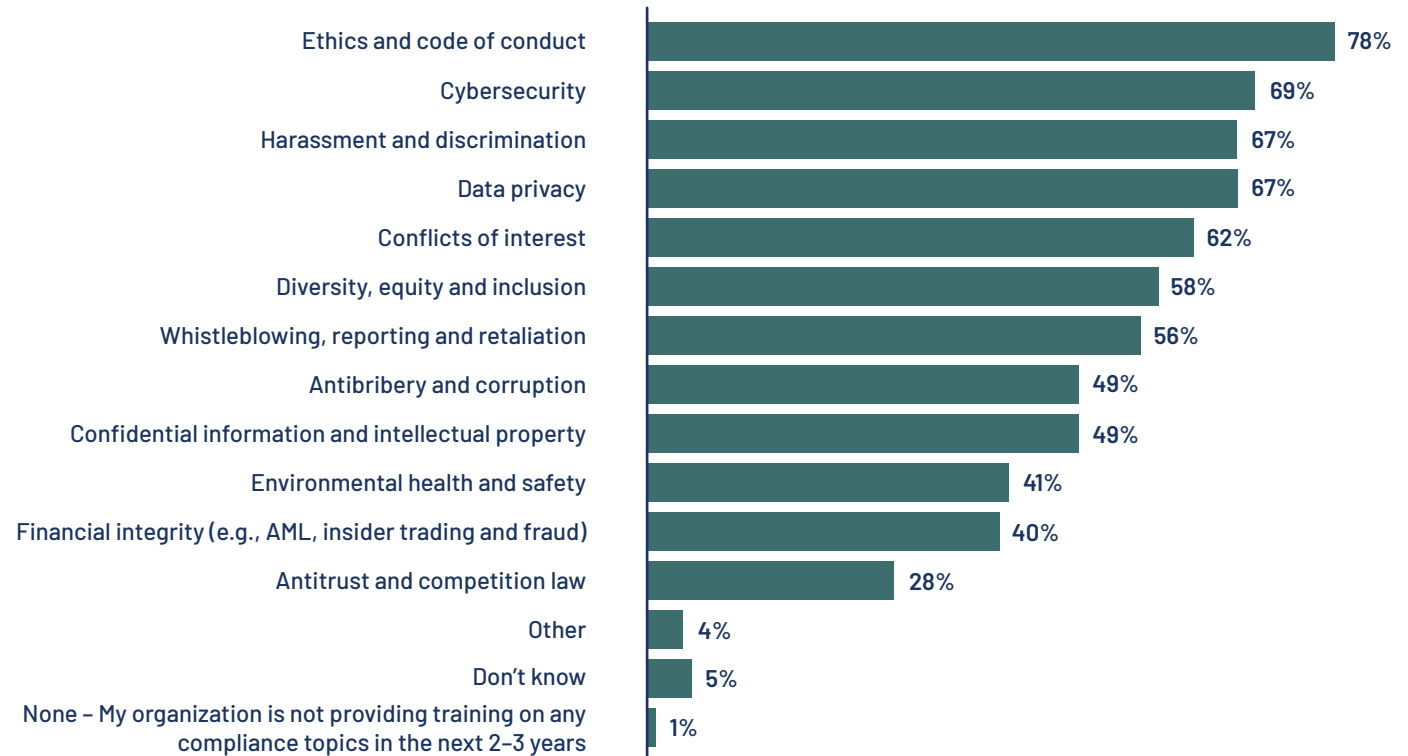
Tailoring training for employees working in high-risk environments is an accepted best practice. Yet the data shows a significant portion of respondents (36 percent) ranked themselves as either “fair” or “poor” in this area. This is despite the fact that doing so is a good way to align the training component of a compliance program with an organization’s risk profile. This is an area of opportunity for many risk and compliance programs.

### Whistleblower & Retaliation-Prevention Training Needs Improvement

Consistent with findings in other areas of the report, despite the acceleration of regulatory pressure around whistleblower and retaliation-prevention programs, only 56 percent of respondents said they planned whistleblower training in the next 2 to 3 years.

### Compliance Topics Will Train on in the Next 2-3 Years

Only 56% of respondents indicated they will be training on whistleblowing, reporting and retaliation – despite new whistleblower protection rules coming into effect

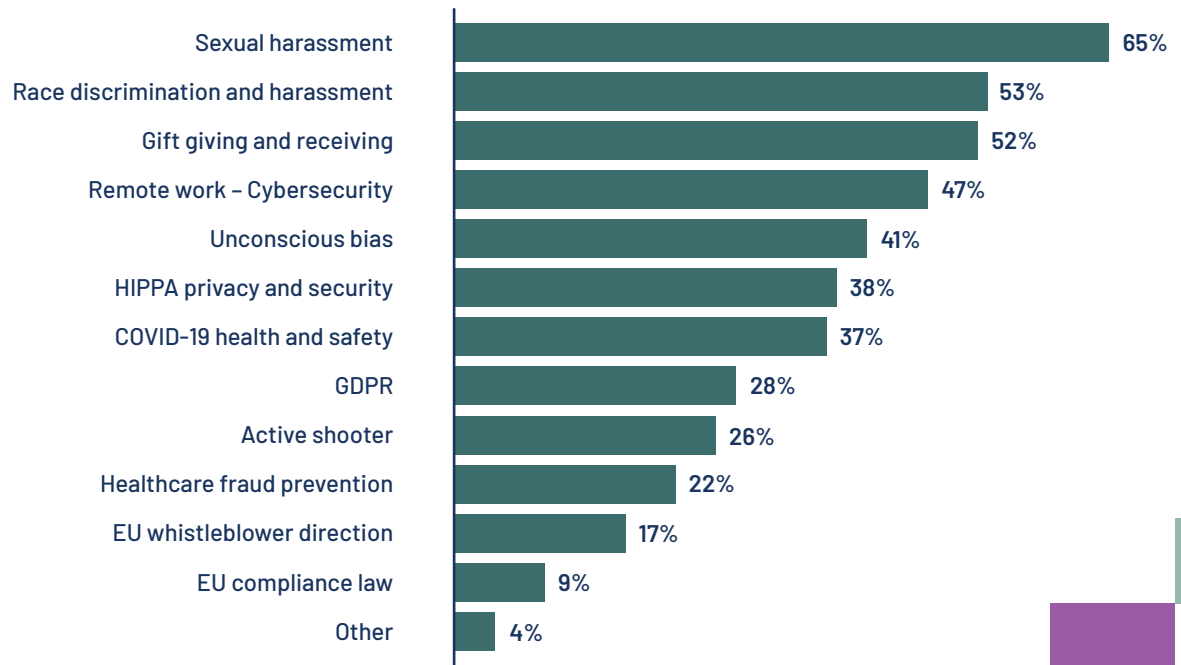


BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

On which of the following compliance topics will your organization provide training in the next 2-3 years? Please select all that apply.

## Compliance Subtopics Will Train on in the Next 2-3 Years

Sexual harassment and racial discrimination and harassment remain top priorities



BASE: PROVIDING COMPLIANCE TOPICS TRAINING IN THE NEXT 2-3 YEARS (n=818)

On which of the following compliance subtopics will your organization provide training in the next 2-3 years? Please select all that apply.

Increasing employee awareness of, and trust in, the organization's whistleblowing program has many benefits, not the least of which is improving the likelihood they will use the system rather than reporting to outside entities such as regulatory bodies. These topics deserve additional attention.

Beyond whistleblower training, almost 4 out of 5 respondents (78 percent) said their organization planned training around ethics and code of conduct,

followed by cybersecurity (69 percent), harassment and discrimination (67 percent) and data privacy (67 percent).

Sexual harassment and race discrimination/harassment topped the list of planned compliance subtopics among those intending to do any compliance training in the next 2-3 years, and in a sobering finding, one-quarter (26 percent) planned active shooter training.



## Hotline & Incident Management

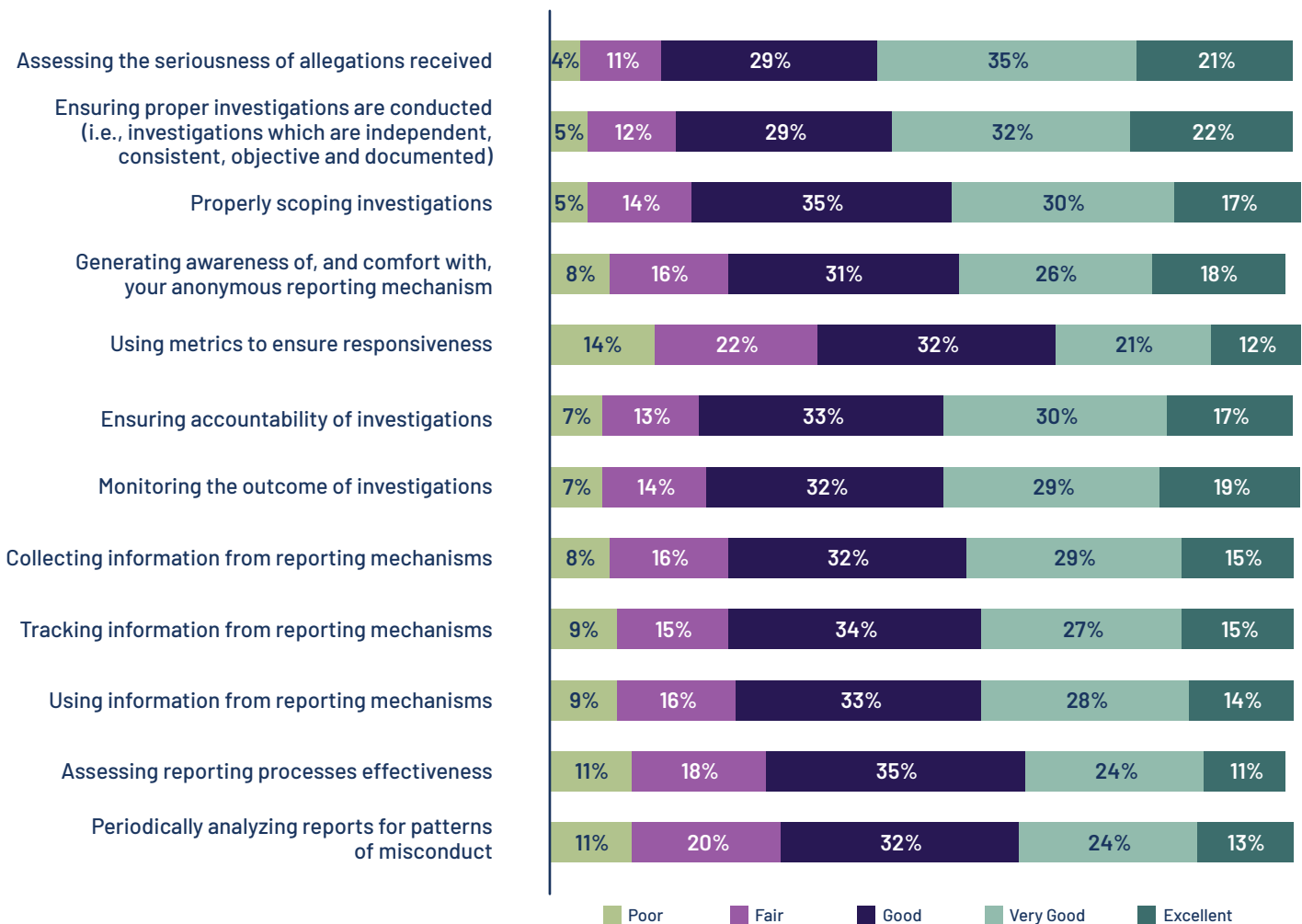
### Strong Confidence in Incident Management Performance; Less in Metrics, Analytics

Respondents rated their organizations highly in various hotline and incident management

program components, including assessing the seriousness of allegations and ensuring proper investigations are conducted.

### Rating Organizations Compliance Program Performance in Terms of Hotline & Incident Management

Respondents rate themselves highly in terms of hotline and incident management but are not confident in using metrics to ensure responsiveness



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

How would you rate your organization's compliance program's performance in the following aspects of hotline and incident management?

One notable area of relative weakness was in the use of metrics to ensure responsiveness. More than a third of organizations (36 percent) rated themselves as either “fair” or “poor” in this area. This measure is key given that responsiveness and communication is necessary to build trust.

Nearly one-third of respondents (31 percent) rated their organization as “fair” or “poor” in periodically analyzing reports for patterns of misconduct. As discussed earlier in this report, this speaks to the challenge some compliance programs face in data collection and leveraging it for effective risk management across the organization. While organizations may have a broadly ethical and compliant culture, there may be pockets of

discontent or less-than-desirable behavior that can be discovered through a thoughtful analysis of the incident reporting data at a local or regional level.

### More than One-Quarter of Organizations Lack a Non-Retaliation Policy, & Worse, a Hotline

Over one-quarter of organizations (28 percent) did not respond that they possess a non-retaliation policy as a part of their organization’s confidential reporting and investigatory program. These policies are important to support the willingness to “speak up” about misconduct. Similarly, a significant number of respondents (29 percent) did not indicate that their company had a hotline or whistleblower internal reporting channel. This may be the most astounding finding of the survey.

## Confidential Reporting & Investigations

### More than one-quarter of organizations lack a hotline or non-retaliation policy



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

Which of the following are part of your organization’s confidential reporting and investigatory program? Please select all that apply.

## Organization Disciplinary Process

Only 59 percent reported that discipline and incentives are applied fairly and consistently



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

Which of the following statements accurately describe your organization's disciplinary process? Please select all that apply.

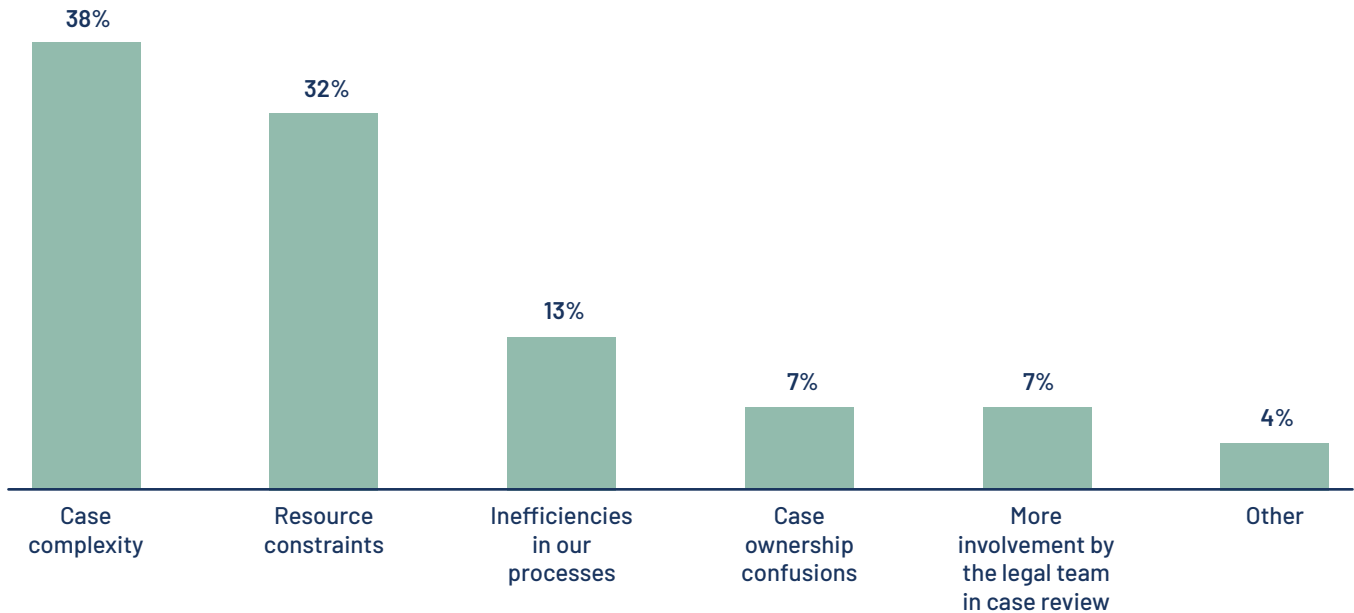
### Disciplinary Actions Not Always Applied Fairly

Tracking and ensuring consistency in discipline is a key element of a best practice program. About 2 in 5 respondents did not indicate that disciplinary actions and incentives are fairly and consistently applied across their organization. This can be a major risk to culture and trust for ethics and compliance programs for organizations where this is true, or even just believed to be so.



## Biggest Impact on Time It Takes to Investigate & Close a Report

Case complexity, resources restraints impacting case closure time



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

What has the biggest impact on the time it takes to investigate and close a report in your organization? Please select one.

## Case Closure Times

Case complexity and compliance program resource constraints are by far the biggest drivers of lengthier case closure time. Organizations that delay investigations due to inadequate resources have an opportunity to review this concern with leadership because excessive case closure times send a message to employees that the organization doesn't prioritize issue resolution, which impacts the credibility of the program and risks extending the time that wrongdoing may be occurring.



## Integrated Risk Management & Approach to Third Parties

### Integrated Risk Management Still a Work in Progress

While a third of respondents (33 percent) indicate they have integrated some of their risk management capabilities, the data shows there are a range of approaches to achieve this goal. More than a quarter (27 percent) indicate that risk management is still siloed throughout the organization, though a significant portion said they plan to integrate in the future. Interestingly, 12 percent of respondents did not know if their organization had a risk integration strategy at all.



### Risk Integration Management Capabilities

Over half (60%) of organizations have some level of risk integration



BASE: KNOWLEDGABLE ABOUT RISK MANAGEMENT (n=790)  
How integrated are your organization's risk integration management capabilities?

### Risk Integration Leadership Varies

The data shows that fewer than one-third of organizations (29 percent) have a board-level committee to address risk integration enterprise-wide. At a minimum, organizations should at least have a management-level committee devoted to this. Just over one third of respondents (35 percent) said their organization does in fact have a management-level committee for this purpose. More than one-quarter of organizations (27 percent) have no committee at all, though some plan for one in the future.

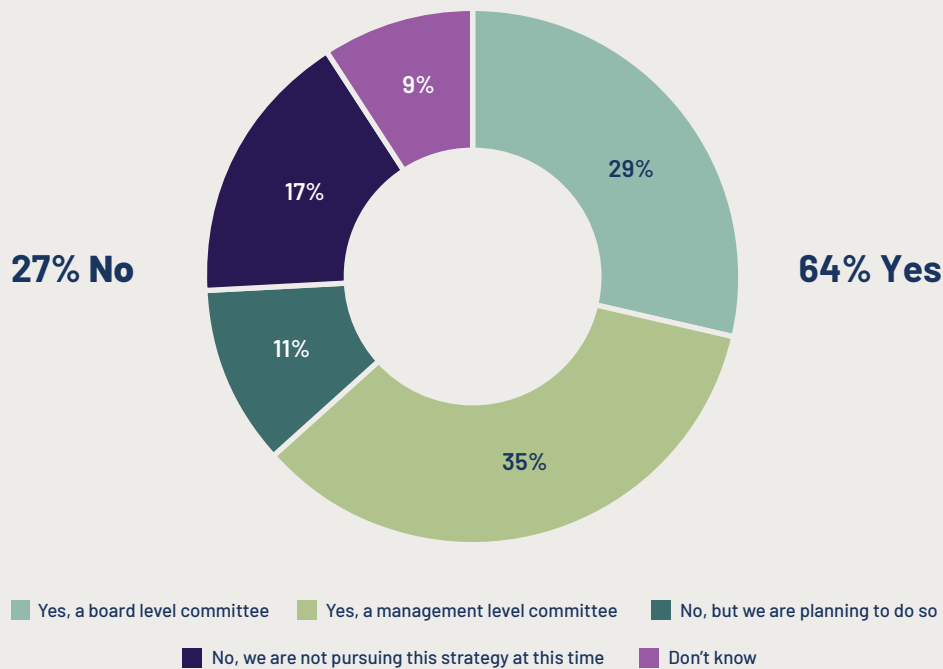
### Third-Party Risk Management Has Room to Optimize

Organizations were strongest in ensuring appropriate contract terms from third parties, with 4 out of 5 respondents (82 percent) describing their operations as at least “good” in this area. The second highest rating was for establishing appropriate business rationales for each third-party relationship.

The lowest ratings were for organizations requiring compliance training and certifications from third parties, with 44 percent describing their performance as either “fair” or “poor.”

### Committee to Address Risk Integration Enterprise-Wide

Less than a third have a board level committee to address risk integration, just over one-third have a management level committee



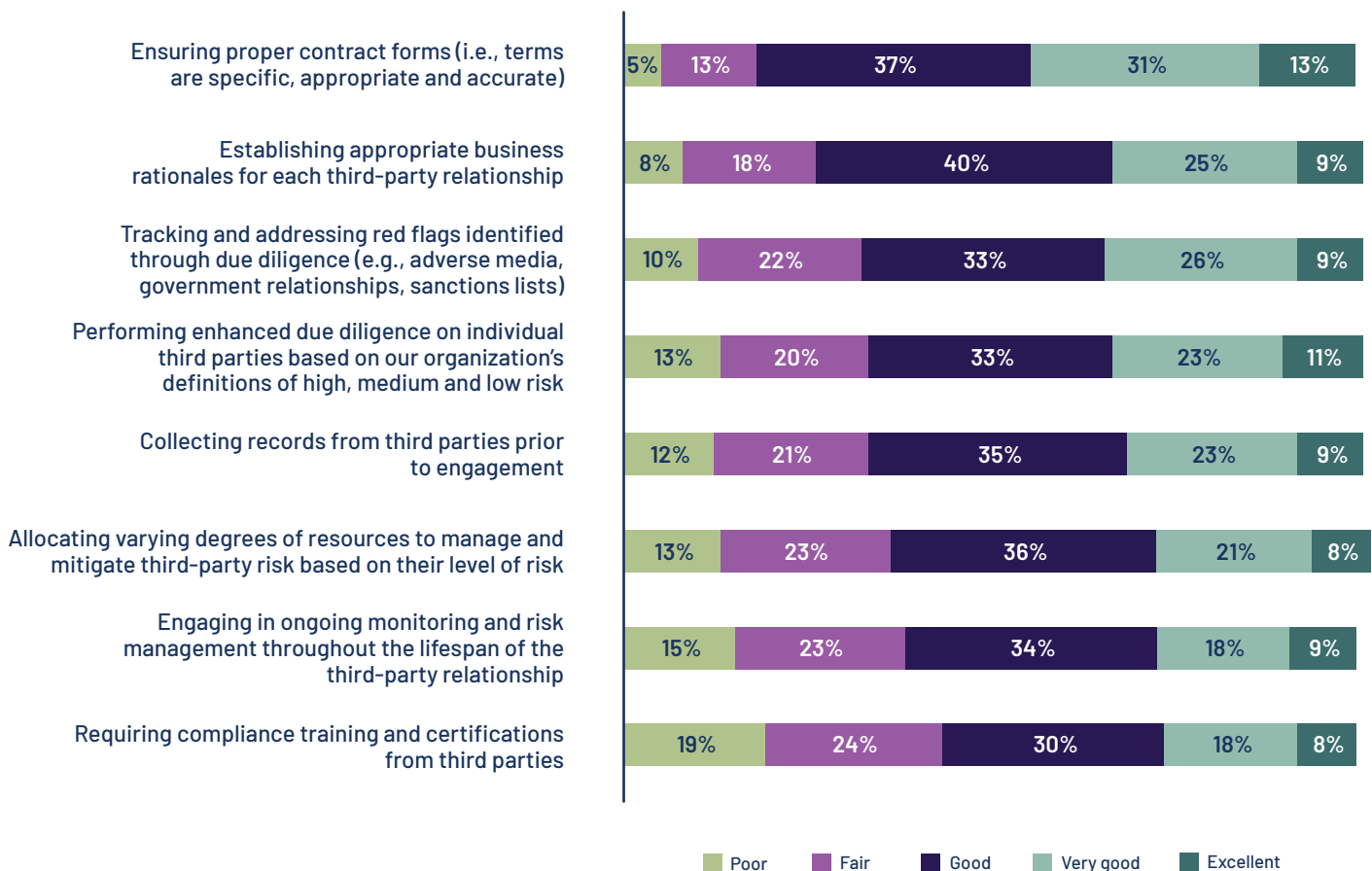
BASE: KNOWLEDGEABLE ABOUT RISK MANAGEMENT (n=790)  
Does your organization have a committee to address risk integration enterprise wide?

This last area is a challenge, as third-party entities often have their own training programs that may overlap in subject matter with those requested by their clients. These matters are often addressed on contract terms, which received the highest rating.

In practical terms, this may prompt consideration of a risk-based approach that requires only the most critical third parties go through additional compliance training, and consideration should be given to the third party's comparable training.

## Rating Organization's Compliance Program's Performance in Terms of Third-Party Due Diligence

Performance across third-party activities is generally consistent, with room for improvement



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

How would you rate your organization's compliance program's performance in the following aspects of third-party due diligence?



Nearly one-quarter of respondents (24 percent) indicate they stratify their level of due diligence based on the risk profile of their third parties. This is an opportunity for improvement because treating all third parties equally, without examination of the risk they prevent, can expend resources unnecessarily.

Finally, and encouragingly, most respondents (63 percent) said their organization's third-party due-diligence program significantly reduces their legal, financial, and reputational risks.

## Organizational Approach to Third Parties

Only a quarter of E&C programs make risk-based allocation decisions throughout the third-party relationship

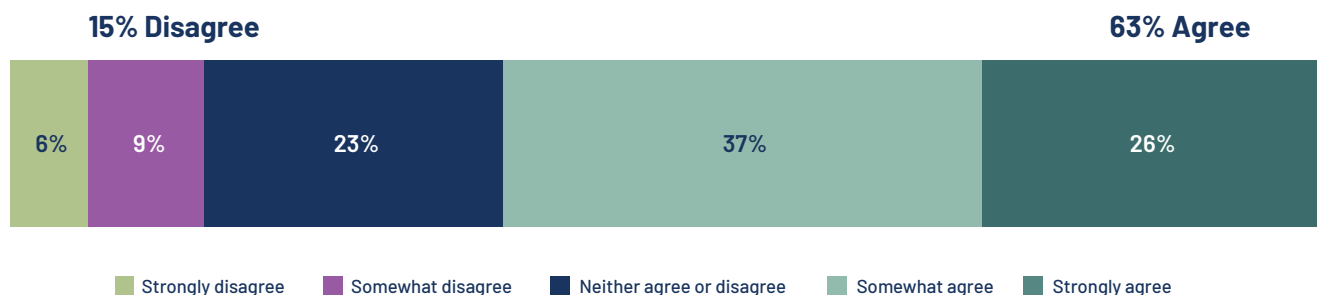


BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

Which best describes your organization's approach to third parties? Please select one.

## Our Third-Party Due Diligence Program Significantly Reduces Our Legal, Financial & Reputational Risks

Nearly two-thirds of respondents believe their third-party due diligence programs significantly reduce risk



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

Rate your agreement with the following statement: Our third-party due diligence program significantly reduces our legal, financial and reputational risks.

# Environmental, Social & Governance

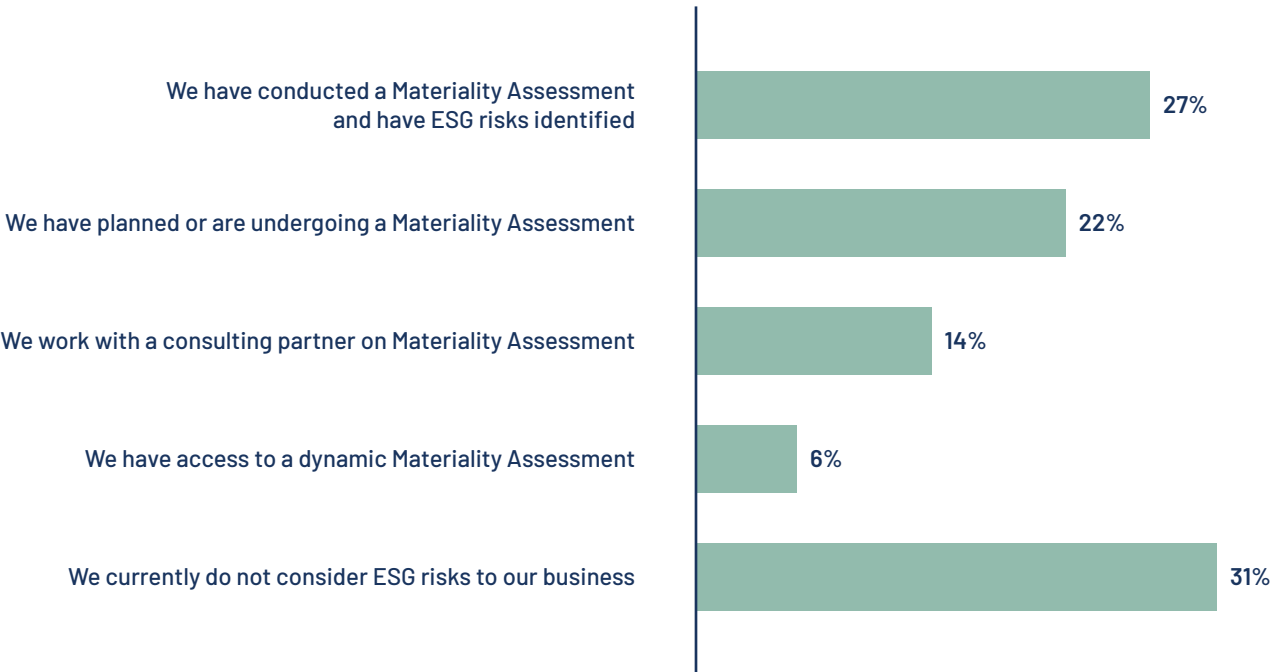
## Organizations are Sizing Up ESG Risks

Many organizations are just starting to come to terms with how to frame and address environmental, social and governance risks. While nearly a third of respondents (31 percent) said they did not currently consider ESG a risk to their organization, this landscape is quickly changing. New regulations are coming online, and customer and other stakeholder attitudes are evolving.



## Determining ESG Risks to Business

Nearly one-third of respondents do not consider ESG risks to their business



BASE: KNOWLEDGEABLE ABOUT ENVIRONMENTAL, SOCIAL & GOVERNANCE (n=428)  
How does your organization determine ESG risks to its business?

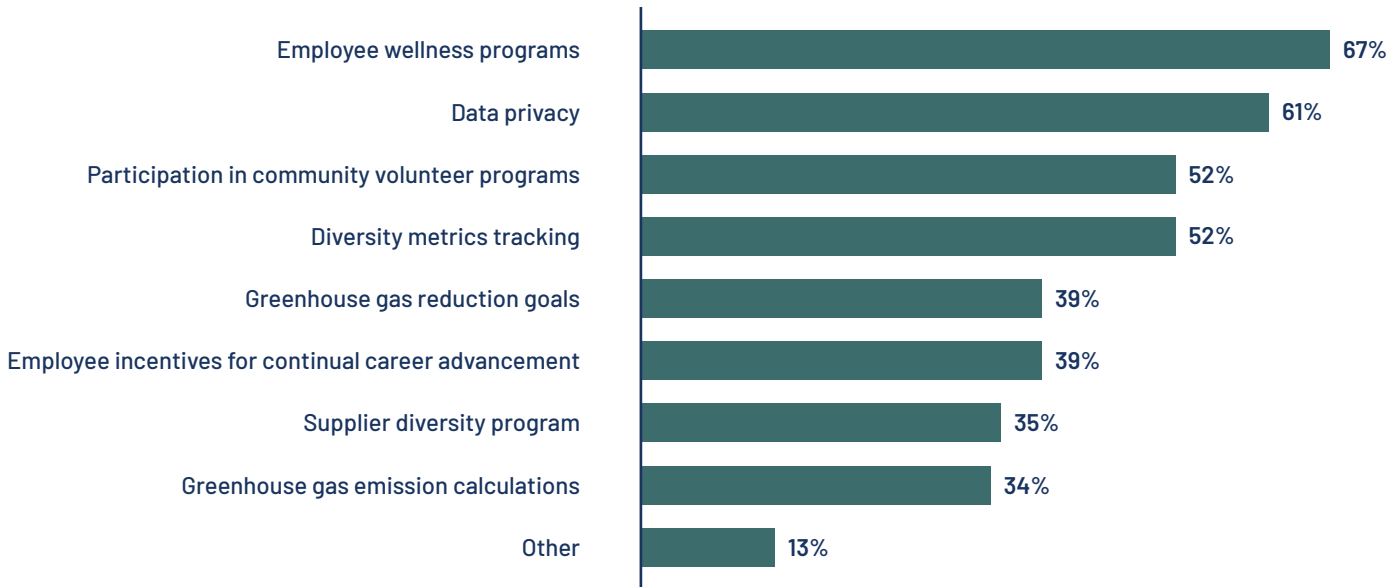
### HR-Centric Elements Top ESG Activities

The survey data show that human resource-centric elements such as employee wellness and community participation are currently the most common elements of ESG programs. Additionally, nearly 2 in 5 organizations (39 percent) include greenhouse gas reduction as a key element of their ESG program. It's clear that "Social" and "Governance" are still top ESG considerations, but "Environmental" impact, including sustainability, will continue to increase in focus and regulatory oversight.



### Aspects of ESG Program

#### HR-centric elements top ESG activities



BASE: KNOWLEDGEABLE ABOUT ENVIRONMENTAL, SOCIAL & GOVERNANCE (n=428)  
Which of the following are included in your organization's ESG program? Please select all that apply.

# ESG Leadership Strengthens

Over half of organizations (56 percent) report having support from the CEO for ESG, and nearly one-third (31 percent) have a dedicated person focused on ESG issues.



# Organization ESG Program

Over half of respondents' report having support from the CEO for ESG programs – nearly one-third have assigned a dedicated person to focus on ESG issues



BASE: KNOWLEDGEABLE ABOUT ENVIRONMENTAL, SOCIAL & GOVERNANCE (n=428)  
Which of the following are true for your organization's ESG program? Please select all that apply.

## ESG Performance Frameworks Still Evolving

The current lack of established ESG program performance metrics make it difficult for organizations to measure their standing and progress. Nearly half of respondents (48 percent) indicated their organization does not use any frameworks or standards to measure and disclose its ESG performance.



## Frameworks & Standards Used to Measure/Disclose ESG Performance

Nearly half do not use any frameworks and standards to measure/disclose ESG metrics – those that do, have not aligned on a standard



BASE: KNOWLEDGEABLE ABOUT ENVIRONMENTAL, SOCIAL & GOVERNANCE (n=428)

Which frameworks and standards does your organization use to measure/disclose its ESG performance? Please select all that apply.

This report highlights the critical role of our profession in strategically supporting our businesses through relevant and actionable risk assessments, while also guaranteeing our organizations embody strong ethical cultures that ensure compliance with policies and the law. With the expectation that hybrid and remote workforces are now a permanent fixture of the economy, R&C professionals also need to ensure that all employees know how to speak up, without fear of retaliation, regardless of their work location – and assure them their voices are important.

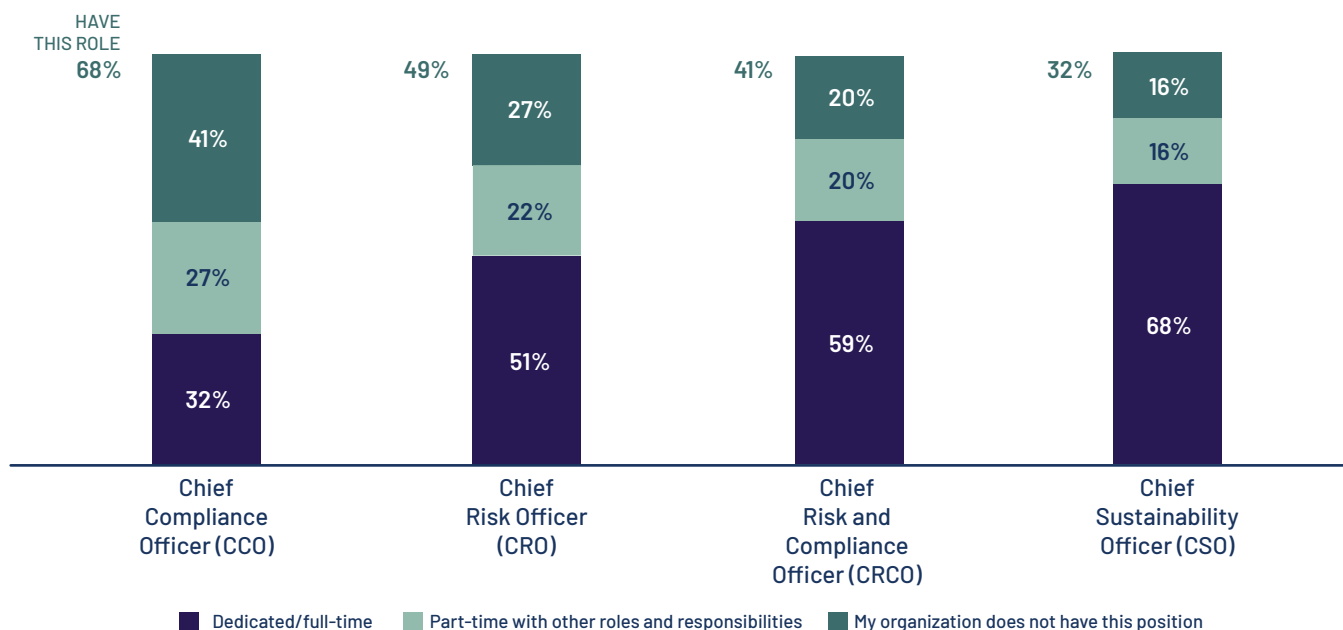
It is encouraging to see so many respondents indicating their programs have a high level of maturity. Still, this report offers ideas of ways to strengthen any program. Considering our 2022 key findings, R&C professionals should ask themselves the following questions:

- Do I have sufficient access to organization-wide operational data to inform my risk assessments? Is my organization leveraging risk assessment findings to inform which business operations receive greater scrutiny?
- Are senior leaders and managers at my organization voicing a commitment to compliance? Are they modeling ethical behavior, especially in the face of competing priorities?
- Are we doing enough to put in place robust internal reporting/whistleblowing channels? Am I using that information sufficiently to inform my knowledge of risk and culture? Are my internal reporting channels sufficient to satisfy regulatory requirements? And, are we truly addressing the fear of retaliation?
- Is my organization focusing enough on the outcome of a strong and ethical culture as a goal for R&C program activities?
- Does my organization have a grasp of relevant ESG issues? Are we prepared to act as reporting frameworks become more standardized?

Our profession must never lose sight of the profound way our work impacts our organizations, our communities and the world. The risk areas and challenges along the way may change, but our mission continues.



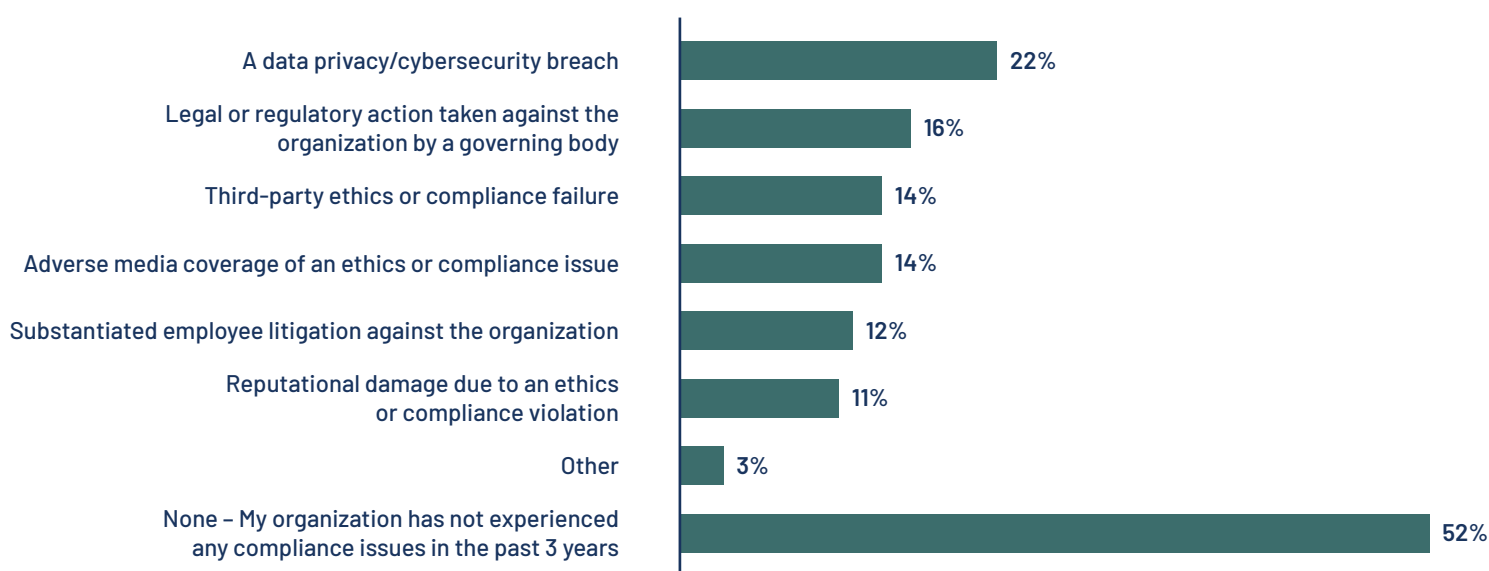
## Position/Roles within Organization



BASE: ALL QUALIFIED RESPONDENTS (n=1,105)

For each of the following positions/roles, please indicate if it's a dedicated/full-time position, part-time position with other roles and responsibilities or if your organization does not have this position.

## Compliance Issues in the Past Three Years

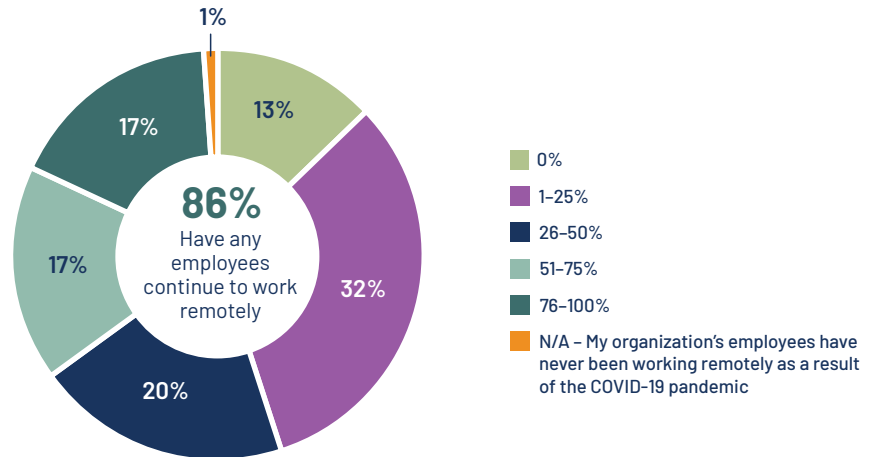


BASE: ALL QUALIFIED RESPONDENTS (n=1,105)

Has your organization experienced any of the following compliance issues in the past 3 years? Please select all that apply.



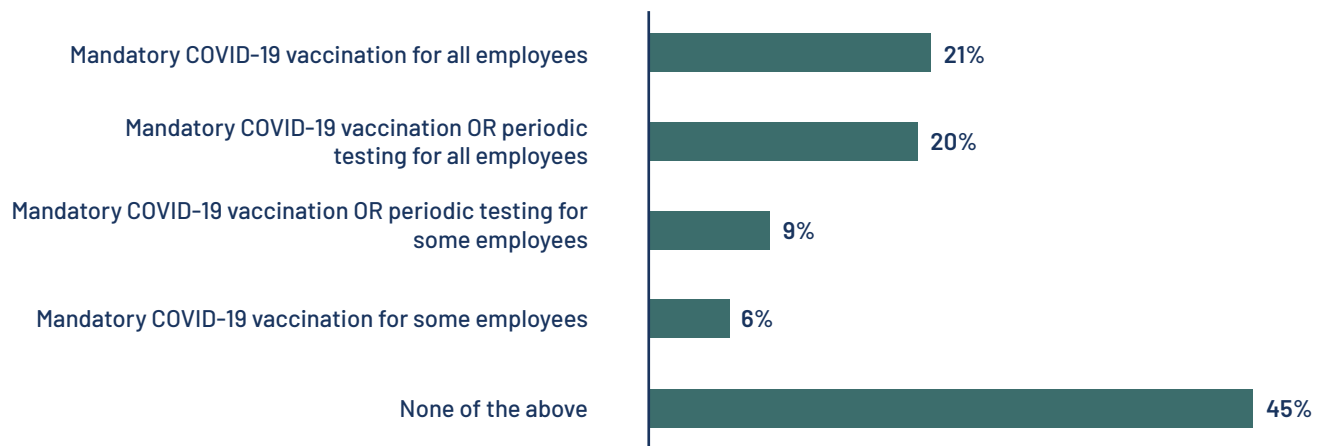
## Remote Work as a Result of COVID-19



BASE: ALL QUALIFIED RESPONDENTS (n=1,105)

What percentage of your organization's employees continue to work remotely as a result of the COVID-19 pandemic?

## Implemented or Planned COVID-19 Policies



BASE: ALL QUALIFIED RESPONDENTS (n=1,105)

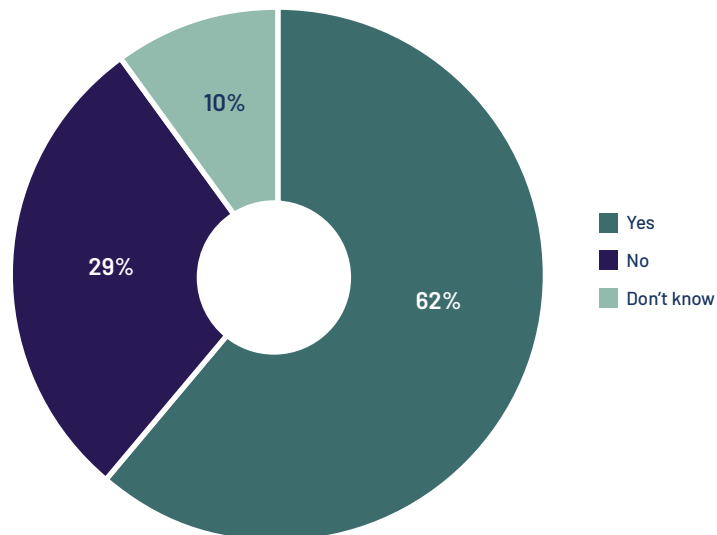
Have you implemented, or are you planning to implement, any of the following policies within your organization?

## Risk & Compliance Training Plan



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

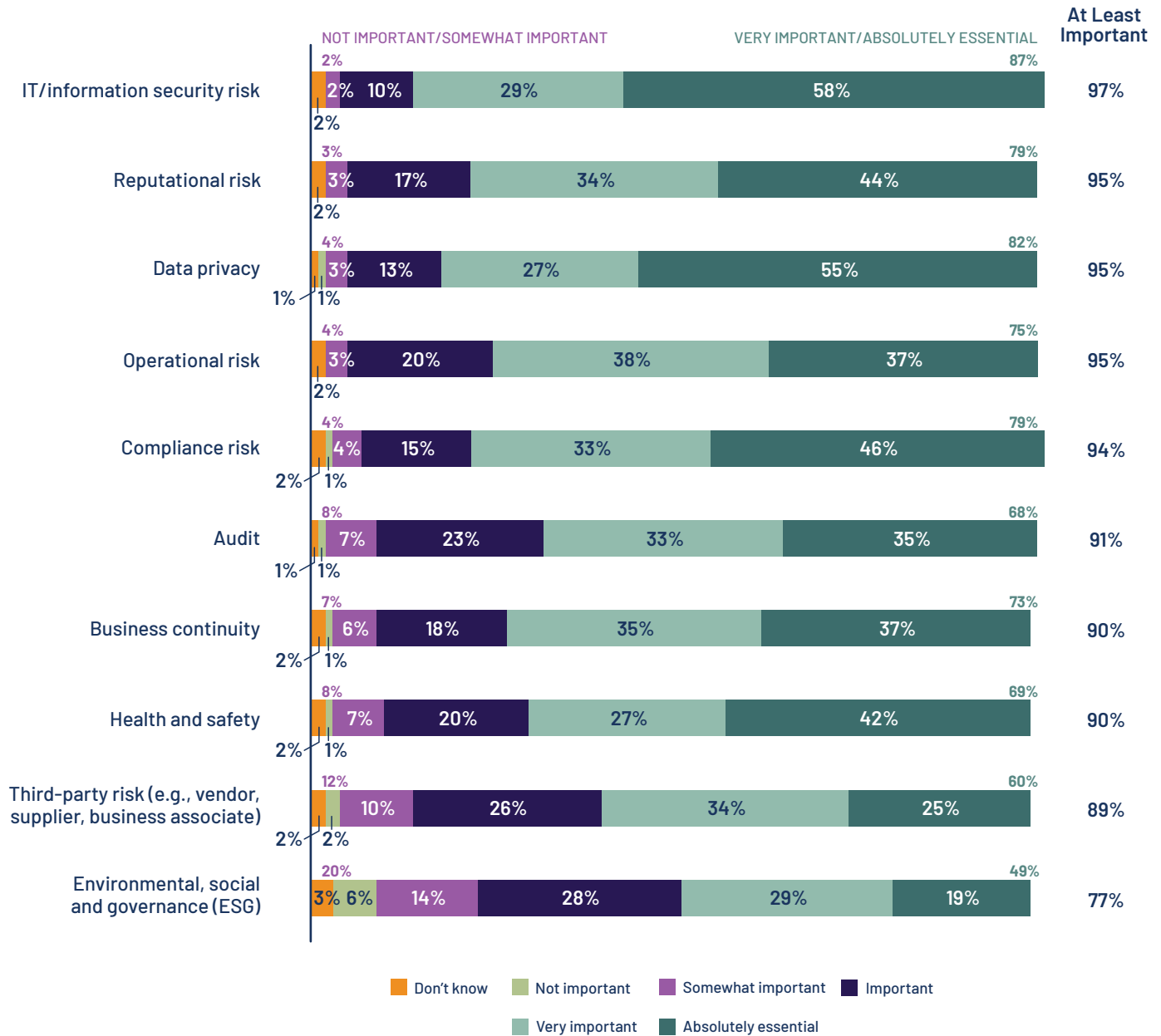
Which of the following does your organization consider in the process of creating its Risk & Compliance training plan?  
Please select your top three considerations.



BASE: KNOWLEDGEABLE ABOUT ETHICS & COMPLIANCE (n=871)

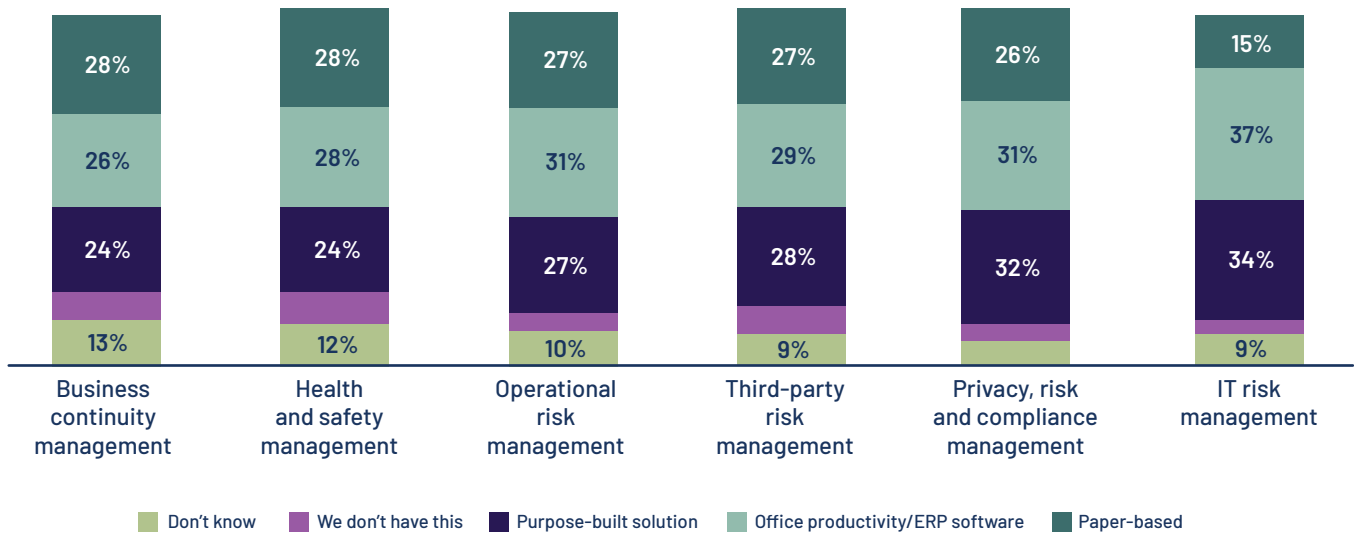
Does your organization have a Risk & Compliance training plan?

## Importance of Management of Risk Areas



BASE: KNOWLEDGEABLE ABOUT RISK MANAGEMENT (n=790)  
How important is the management of the following risk areas to your organization?

## Administer R&C Program Elements



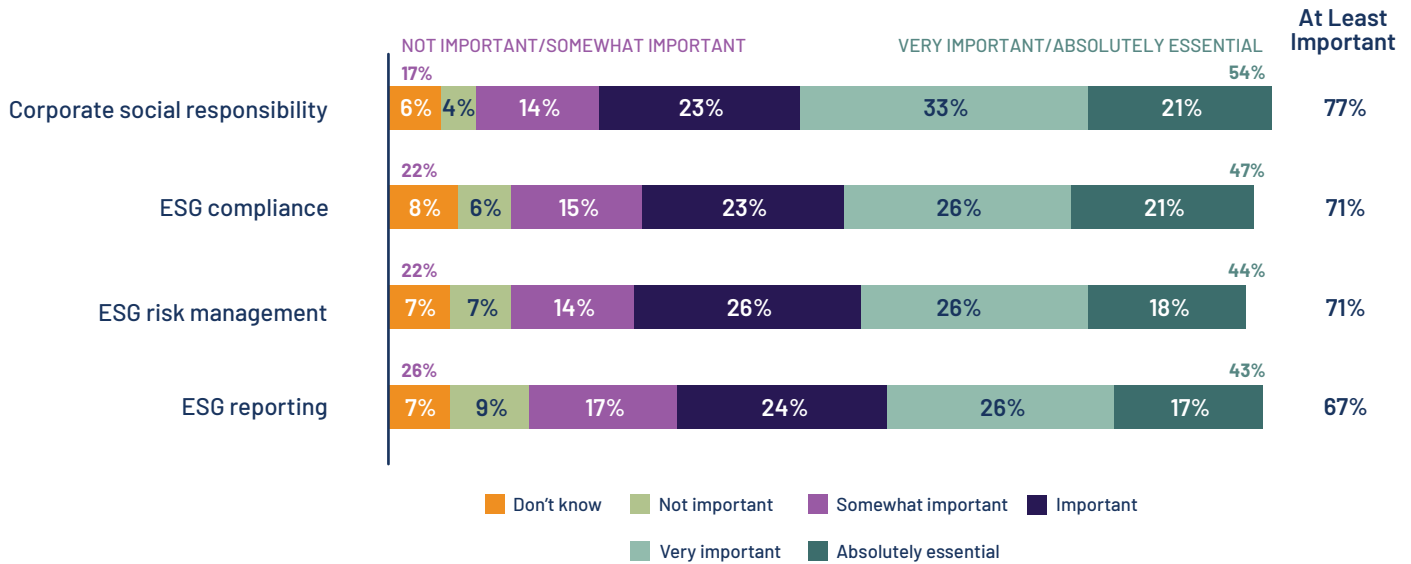
BASE: KNOWLEDGEABLE ABOUT RISK MANAGEMENT (n=790)  
How does your organization primarily administer the following Risk & Compliance program elements?

## Organization's R&C Program Processes & Procedures



BASE: KNOWLEDGEABLE ABOUT RISK MANAGEMENT (n=790)  
How would you describe your organization's Risk & Compliance program processes and procedures (P&P)? Please select one response only.

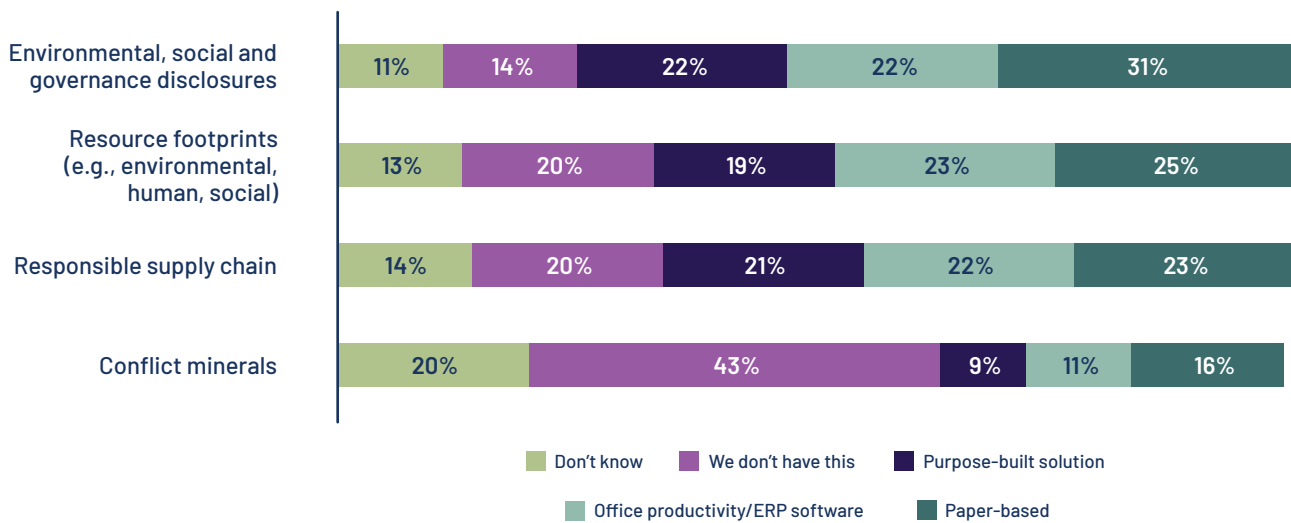
## Importance of Managing ESG Issues



BASE: KNOWLEDGEABLE ABOUT ENVIRONMENTAL, SOCIAL & GOVERNANCE (n=428)

How important is the management of the following environmental, social and governance (ESG) areas to your organization?

## Administration R&C Program Elements



BASE: KNOWLEDGEABLE ABOUT ENVIRONMENTAL, SOCIAL & GOVERNANCE (n=428)

How does your organization primarily administer the following Risk & Compliance program elements?



## About the Author

### **Carrie Penman** **Chief Risk &** **Compliance Officer,** **NAVEX**

As one of the earliest ethics officers in the industry, Carrie Penman previously served four years as deputy director of the Ethics and Compliance Officer Association, now ECI. A scientist by training, she developed and directed the first corporate-wide global ethics program at Westinghouse Electric Corporation between 1994 and 1999. Carrie now leads NAVEX's risk management processes and oversees its internal ethics and compliance program.

Carrie has extensive client-facing risk and compliance consulting experience, including more than 15 years as an adviser to boards and executive teams. Carrie was awarded the inaugural Lifetime Achievement Award for Excellence in Compliance 2020 by Compliance Week magazine. In 2017, she received the ECI's Carol R. Marshall Award for Innovation in Corporate Ethics for an extensive career contributing to the advancement of the ethics and compliance field worldwide.

### **About The Harris Poll**

The Harris Poll is one of the longest-running surveys in the U.S., tracking public opinion, motivations and social sentiment since 1963. It is now part of Harris Insights & Analytics, a global consulting and market research firm that strives to reveal the authentic values of modern society to inspire leaders to create a better tomorrow. Harris works with clients in three primary areas; building twenty-first century corporate reputation, crafting brand strategy and performance tracking and earning organic media through public relations research. Their mission is to provide insights and advisory to help leaders make the best decisions possible.



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