NAVEX

Northstar Series

Regional Whistleblowing & Incident Management Benchmark Report

2026

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The Northstar Series is NAVEX's curated collection of proprietary data and unparalleled analytical insights. Within this series we explore groundbreaking analysis intersected with bespoke data, shaping strategic decision-making across the risk and compliance landscape.

Introduction

Consistent analysis and benchmarking of whistleblowing hotline data helps organizations answer crucial questions about their risk and compliance programs. This includes the efficacy those programs have in driving the ethical culture of the organization's operations worldwide. Does the organization's culture encourage employees to raise concerns without fear of retaliation? Is the investigation process expedient and effective, helping to build trust and mitigate risk? Does the nature of reported issues raise red flags when compared to regional norms?

Utilizing over 2.37 million anonymized customer reports received in 2025, and with a focus on four geographic regions, NAVEX provides this 2026 analysis to help risk and compliance practitioners understand and benchmark how their program performance compares with regional peers. The benchmarking metrics in this document provide a framework for organizations to speak a common language of ethics and compliance risk while identifying areas to enhance ethical cultures across silos and regional boundaries. Throughout this study, we will focus on commonalities and differences across Europe, Asia Pacific (APAC), North America and South America.

This report follows publication of the [NAVEX 2026 Whistleblowing and Incident Management Benchmark Report](), which examines the same dataset from an overall global perspective. Readers are encouraged to review our earlier report as additional guidance to help benchmark reporting programs.

New for this 2026 Regional Whistleblowing and Incident Management Benchmark Report is analysis of reporting by company ownership – private versus public. We also continue last year's addition of reporting comparing employees and third parties. For the fourth year, we include a view of relevant metrics by both region of organization headquarters and region of report origination. Finally, for ease of comparison, we include the overall global metric alongside each regional breakdown.

Risk and compliance professionals can trust these benchmarks to help guide decision making and to better understand how their programs compare against peers in their respective regions. To leverage more advanced benchmarks, NAVEX offers custom benchmarking options as part of our GRC Insights™ benchmarking services. These resources include benchmarking based on industry, size and other elements specific to individual organizations. Learn more about our services at www.navex.com.

Reports from around the world

NAVEX analyzed the reporting data used in this publication by both company headquarters region and report origination region. We then grouped these organizations into four regions: Europe, Asia Pacific (APAC), North America and South America. APAC includes Australasia, Middle East and Asia. Reports from Africa-based organizations or Africa-originated reports are omitted unless otherwise noted.

How we calculate our benchmark metrics

For statistical accuracy, our analysis includes only those organizations that received 10 or more reports in all of 2025. The resulting database includes 4,052 organizations that received a total of 2.37 million individual reports. This group represents 77 million employees globally.

To remove the impact of outliers that might skew the overall reporting data, we calculate each benchmark metric for each organization, then identify the median (midpoint) across the total population. The resulting value – identified in charts throughout this report as the median reporting value or MRV – allows us to create a clearer picture of what is happening in our customers' organizations, as well as to provide organizations with benchmarking data that is not skewed by organization size.

Some data in this report is presented using frequencies (percentages of total). Keep in mind, frequencies have been rounded and may not add up to exactly 100%.

All data presented is clearly marked with the calculation methodology. A more detailed discussion of the calculation methodology, distributions, assumptions and implications of each is presented in the appendix to this report.

There are no "right" outcomes in benchmarking reporting data. By definition, a median or midpoint means that half the organizations are higher and half are lower than the MRV. Where appropriate in this report, we provide what we consider to be an acceptable range of results to provide context for your own data.

Falling within the range generally indicates an organization is on par with medians for the organizations within our database. Falling outside the normal range, in either direction, is a good prompt to take a closer look at whether there is an issue that needs more attention from the organization.

Snapshot of our database

Top industries

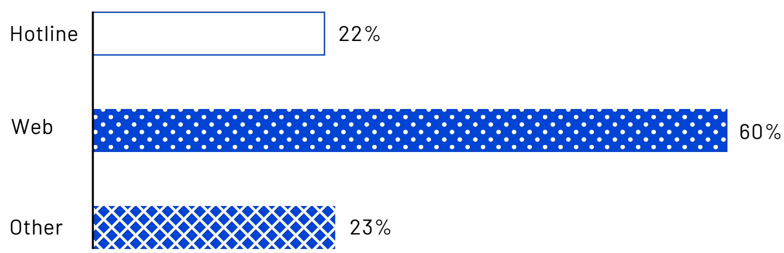
Retail Trade, Health Care and Social Assistance, Finance and Insurance, Transportation and Warehousing, Administrative and Support Services, Professional, Scientific and Technical Services, Transportation Equipment Manufacturing, Food Manufacturing, Food Services and Drinking Places, Educational Services, Information, Wholesale Trade

4,052
Number of Organizations

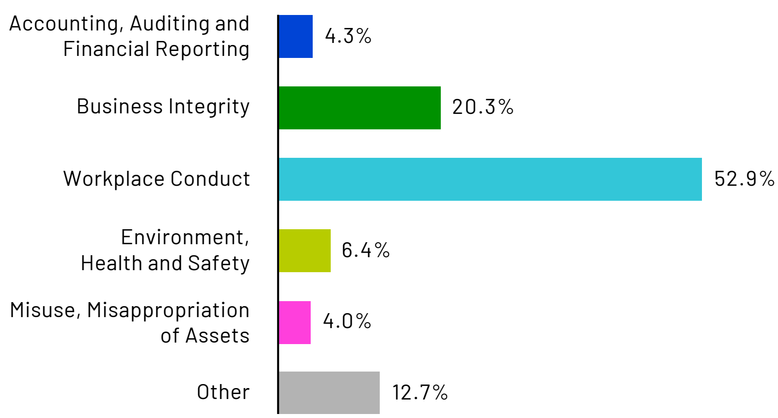
2.37 Million
Number of Reports

77 Million
Number of Employees

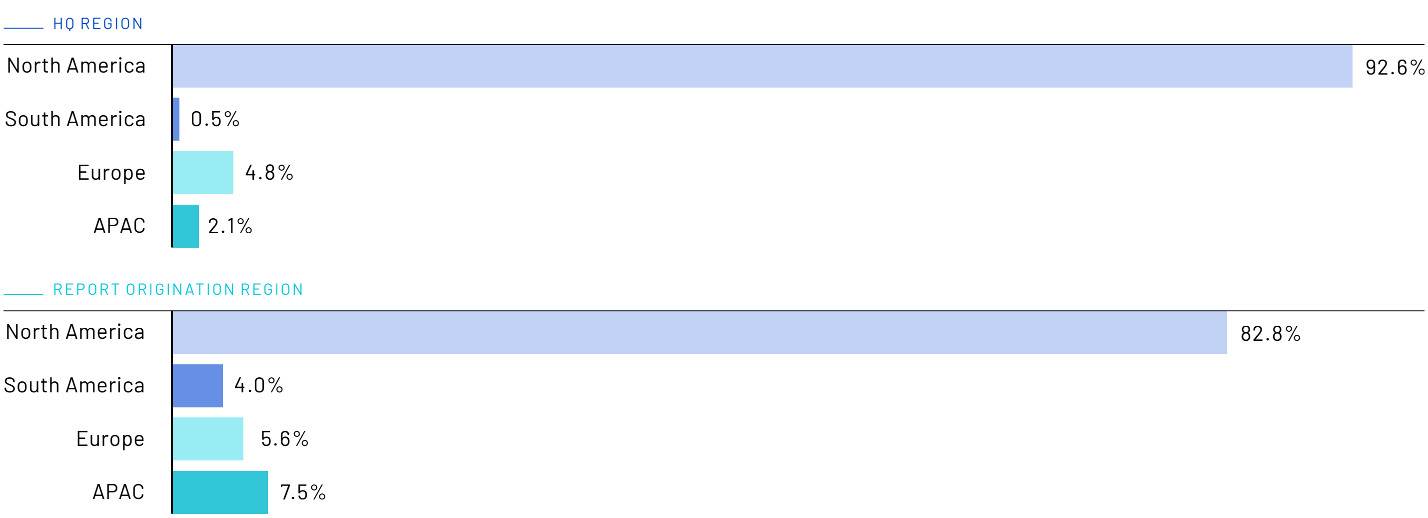
INTAKE METHODS
Median reporting value (MRV)



RISK CATEGORY
Median reporting value (MRV)



REGION
Frequency



Executive summary

This 2026 Regional Whistleblowing & Incident Management Benchmark Report reveals region-focused insights from NAVEX's largest-ever repository of anonymized internal reporting data. More than 4,000 of our customers that received 10 or more reports in 2025 are included in this analysis, representing nearly 80,000 employees and 2.37 million individual reports.

While our 2026 Whistleblowing & Incident Management Benchmark Report looked at reporting activity from a global perspective, this regional analysis sorts this data into the four regions of North America, South America, Europe and Asia Pacific (APAC). This gives readers another angle for comparing their compliance programs with peers and better understanding their organization's risk profile and cultural health.

In addition to this executive summary's exploration of some notable findings, we also provide dozens of charts comparing benchmarking metrics across regions. With guidance included for each metric, we hope readers can use this data to inform decisions that improve their programs. We provide this data freely – not just to our customers – with a goal of supporting stronger ethics and compliance globally. Additional perspective and guidance is available in our previously published global report.

Some of the questions this digest may help to answer include:

- Is my report volume tracking with relevant regional trends?
- Do my intake channels adequately serve how local reporters prefer to raise concerns?
- Are my reporters more or less likely to put their name behind an allegation in areas where my organization does business?
- Am I closing cases in the typical timeframe for a given region?
- Does my mix of issues reflect what individuals in a certain region tend to report?
- Where in the world do organizations tend to reflect best practices, and how can I learn from their example?

Reflecting both "region of headquarters" and "report origination region" where possible – as well as four different geographies – each metric provides opportunity for interpretation and application. Consider how this data is relevant to your specific challenges, and use it to tell a story that helps the broader organization understand the impact and needs of the compliance program.

Below are some key insights from our analysis and highlights of notable regional differences in organizational data.

Report volume is growing, but varies substantially between regions

Median *Reports per 100 Employees* reached a four-year high for organizations in all regions in 2025 (setting aside those in South America, where outliers can have outsize influence over a relatively smaller dataset). Growth was uneven across regions, but the increases are a positive signal. More reporting is generally a good thing, showing employees and third parties trust and utilize the internal system for raising concerns of misconduct.

As in previous years, North American organizations had the greatest median report volume (excluding South America) in 2025 at 1.86 *Reports per 100 Employees*. This record-setting year represented a notable increase from 1.65 in 2022, and a positive break from relatively stable median reporting levels in 2023 and 2024 at 1.78 and 1.75 respectively.

Following North America, at a distance, were organizations in APAC, with a record median 0.83 *Reports per 100 Employees* that was nonetheless relatively consistent with prior years. Europe has seen substantial growth – 0.53 in 2022, and 0.77 in 2025.

All regions registered their greatest share of 2025 reporting during and around October. Organizations should consider the rhythm of reporting in their respective regions when timing activities like refresher training around the internal reporting program.

Web intake grows in prominence

Our analysis shows distinct differences across regions in the level of activity for different reporting channels, with Web reporting growing as a share of total reports.

Organizations based in every region apart from North America showed more than half of reports coming through a web-based channel. North American organizations received about a third of their reports through the Web channel. The frequency of reports received via Web has increased or remained steady for organizations in each region, including North America, in the past four years. Yet, it is notable that North American organizations lag behind the rest of the world in web-based reporting.

North American organizations stand out when it comes to intake through Hotline and "Other" (generally reports made in person to compliance, HR or a manager). For North American companies, just over one quarter of reports were made via a hotline; Europe-based companies had the second-highest Hotline reporting rate, at 15%. Forty-two percent of reports came through the "Other" channel for those based in North America, followed by APAC-based organizations at 29%.

It's clear that organizations in all regions should invest in strong Web intake capabilities given the growing digital preferences. However, the contrast between North America and other regions invites some questions. Are organizations outside of North America doing enough to encourage and track reporting made through other channels? Some reporters simply prefer a live interaction, making hotline and in-person reporting preferable for those individuals. As always, it is critical that organizations provide and encourage the use of all channels in order to invite the healthiest level of reporting.

Across all regions, organizations that track "Other" reports made outside of only web and hotline intake consistently capture a greater share of reports. This provides a better picture of full reporting activity – an important measure when it comes to resourcing requests. For example, organizations in Europe tracking only Hotline and Web had a median of 0.50 *Reports per 100 Employees* in 2025 compared to 0.95 for those tracking reports from all sources – nearly twice the level of reporting activity. In this case, many organizations in Europe may generally receive much higher levels of reporting than reflected "on paper" - but they are not tracking those reports made outside of Hotline and Web.

Workplace Conduct leads reporting categories

Allegations under the *Risk Category* of Workplace Conduct, which include *Risk Types* such as Workplace Civility, Harassment, Discrimination and Retaliation that can significantly impact an organization's cultural health, represented the greatest median reporting level across all regions in 2025. Levels have generally held steady since 2022, and while there have been no major shifts, organizations should continue to ensure they are focusing enough resources for training and other activities in this prominent area.

Regions show some subtle differences in other categories. For example, APAC-based organizations had the greatest median of respective reporting in the Accounting, Auditing and Financial Reporting, Business Integrity, and Misuse, Misappropriation of Assets *Risk Categories*. This may reflect stronger encouragement to report misconduct that might create greater material risk for the organization. South American organizations had the highest respective median categorized as "Other" – readers with a high level of "Other" reporting may want to review those cases to ensure they are properly categorized.

Interestingly, a median 59.1% of reports made from Europe fell under Workplace Conduct, compared to 50% made to *Europe-based organizations*. It appears there may be a disconnect between what Europe-based workers – including those working for multinational companies – want to report versus what Europe-based organizations are doing to encourage and capture that type of reporting. We encourage readers to consider these metrics and others by headquarters location compared to region of report origination, as differences might highlight a chance for improvements that result in stronger reporting levels.

The 24 *Risk Types* that fall under the six *Risk Categories*, when further divided by the four regions as well as headquarters versus origination, invite ample opportunity for consideration. Organizations should parse these metrics carefully in the context of their own operations. Some items do stand out – for example, reporting in North America did not tilt more toward Political Activity in 2025 despite activity surrounding a new U.S. presidential administration. Meanwhile, North American reporting of Imminent Threat to a Person or Property was a greater share than for other regions.

On a final note, Retaliation reporting is always worth special consideration. This type of misconduct can have a major negative impact on a willingness for individuals to utilize the internal reporting program. Acknowledging that reporting levels don't necessarily correlate to the occurrence of actual misconduct (it may, for example, signal a greater willingness to report), the share of reports of the Retaliation *Risk Type* was down year-over-year for organizations based in APAC and South America, up for North America and generally level for Europe. North American organizations had the greatest respective share of reports in the Retaliation *Risk Type*, at 1.23%, followed by Europe at 0.90%.

Anonymous reporting lowest when made to North American organizations, and lowest when received from Europe

North America-based organizations attained the lowest median *Anonymous Reporting Rate* among regions in 2025, at 52%. Organizations in Europe, APAC and South America were similar to each other, where an approximate median 6 out of 10 reports did not include the reporter's name.

The story shifts when viewed through the lens of report origination region. In this case, it is reporting activity *from* Europe that is least likely to be anonymous (at a median 50%). Reporters in North America were close behind, where a median 55% of reports were anonymous. This is another example of a potential disconnect between what organizations in particular regions are doing to encourage reporting versus the actual behavior of workers in different regions.

While the ability to facilitate anonymous reporting is a critical element of any internal reporting program, lower levels of anonymity generally suggest better trust in the system and promote more expedient investigations. Readers can use these metrics to better understand the attitudes of reporters in the regions they operate and plan accordingly to promote better outcomes.

Case Closure Time up for North American organizations, down for others

Organizations based in North America saw median *Case Closure Time* increase comparing 2024 and 2025 – from 19 days to 26 days. Despite this increase, organizations in the region still registered a significantly shorter *Case Closure Time* than elsewhere despite greater median report volume.

Given the relatively large proportion of North American organizations in our dataset, this increase in *Case Closure Time* helped drive the overall global *Case Closure Time* upward. Yet further analysis shows median closure times actually *decreased* year-over-year for organizations in other regions. This was most notable in Europe, where an 18-day decrease put median *Case Closure Time* at 51 days.

North American reporting occurring closer to incident date

The time difference between when an incident occurs and when it is actually reported can be an important factor in both evaluation of culture and the ability to complete an effective investigation. Excluding South America, North American organizations had the shortest median *Time Difference Between Incident and Report Date* among regions at seven days. Europe and APAC were similar, at 13 and 14 days respectively. Trends were similar by report origination.

This might suggest reporters in North America, more than other regions, trust that their organization will take their allegations seriously and drive toward a resolution in an efficient fashion.

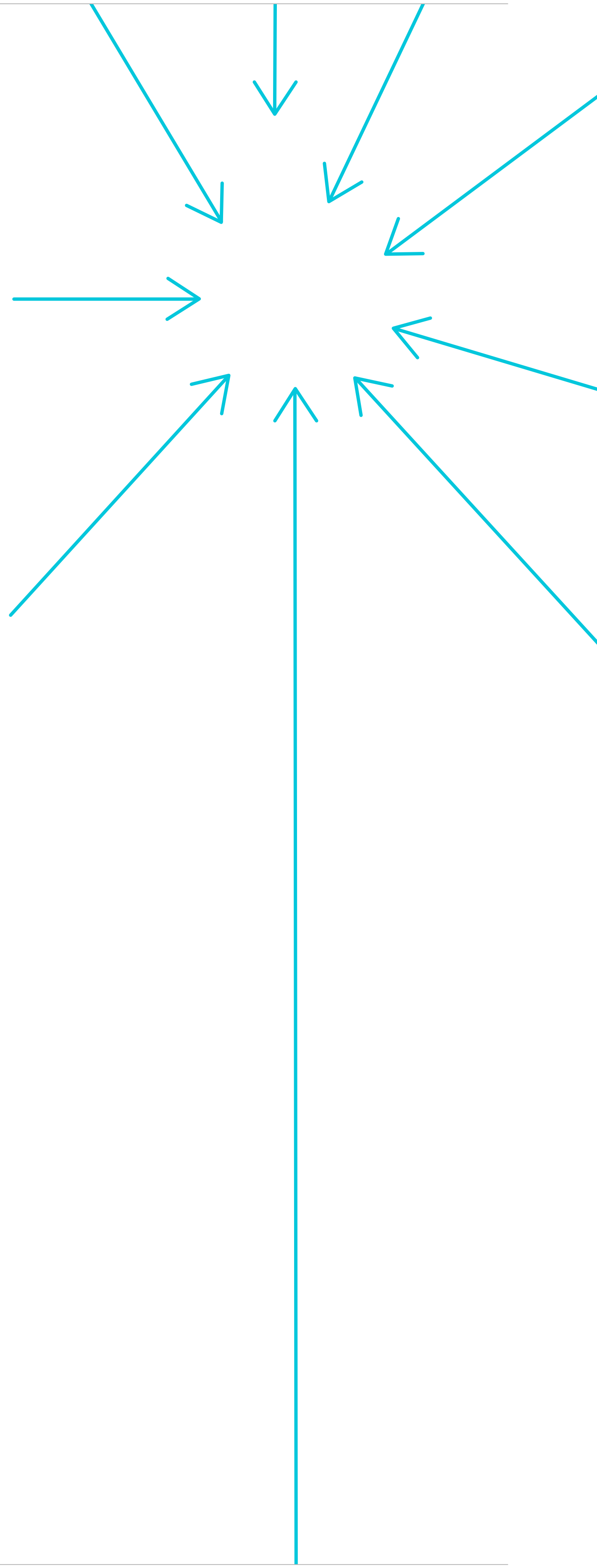
Substantiation Rate similar and unchanged – are organizations at a plateau?

While median *Substantiation Rate* has fluttered a bit in over the years, a "typical" organization in each region had generally similar rates to global peers in 2025, ranging from 41% to 45%. Metrics were similar by report origination region.

This convergence is interesting – does it reflect a settling on a certain plateau for *Substantiation Rate* across borders? This may be an opportunity for organizations to stand out globally through improvements to this metric. Strong training programs and easily accessible policies are one way to influence these results, helping reporters to understand what constitutes actual misconduct and limiting investigation resources spent on unsubstantiated allegations.

APAC most likely to take No Action for substantiated cases, as Europe embraces Training as an outcome

Nearly one quarter (24.5%) of substantiated reports made to APAC-based organizations resulted in No Action in 2025, followed by organizations in South America at 18.0%. As prospective reporters will consider a firm's track record for taking action against misconduct before making an allegation internally, it is important to review whether No Action was indeed warranted. Remember, these are *substantiated* cases.



At 12.8% of outcomes, investigations for Europe-based organizations were most likely among regions to result in Training for substantiated cases. North American organizations were second, at 9.9%.

Substantiated cases for South American companies were most likely to result in Separation of employment (21.7%), with North American companies close behind (18.2%). Organizations in Europe and APAC were generally similar in a lower frequency of cases resulting in Separation (13% or less).

While a small share of *Report Outcomes* overall, 'Referred' was most common for North American organizations (3.8%). It is important to ensure the internal reporting program remains aware of the status of those cases – just because a case is marked as closed and 'Referred' in the system does not necessarily mean another department is going to follow through in actually resolving the issue.

Third-party reporters play a significant role across the globe

NAVEX began publishing data on employee versus third-party reporting last year involving a subset of our customers for which such information is available. While our analysis is still early, two years of data show some consistent differences across geographies.

Setting aside data for South America, which is likely to include significant outliers, North American organizations again saw the highest rates of third-party reporting – at 10.7% of reports in 2025. European organizations received 9.7% from individuals outside the employee base, and for those in APAC, 8.1%.

In short – no matter where you are in the world, organizations are receiving a significant share of their reports from outside of the company. These may be workers in the supply chain, consumers or an employee's family member. Such third-party reporting offers a unique perspective, and channels for outside individuals to submit reports should be clearly advertised and easy to use.

Again in 2025, in all geographies and by both headquarters location and report origination region, third-party reporters were less likely to be anonymous. This can facilitate more expedient investigations and outcomes. Yet, those investigations were generally less likely to substantiate an allegation than those stemming from an employee.

Key actions

This report is rich with opportunities to compare your program to regional norms, and our summary here only scratches the surface. We encourage readers to take their time with these metrics – to hunt for stories relevant to their operations that help make the case for better resourcing and ways to improve your program.

We offer these timeless best practices as a starting point:

- **Ensure your organization is tracking reports from all sources – not just hotline and web.** This provides the most accurate view of full activity and workload for the internal reporting program, informing strategic decisions and providing clarity for necessary resourcing.

- **Prepare for web to grow in prominence by ensuring your web intake is easy to find and use for both internal and external reporters.** Also ask yourself if your program is doing enough to promote hotline and in-person reporting, as we see substantially more activity for these channels in North America data.

- **Build trust in the reporting program by embracing and messaging a no-tolerance policy for retaliation. Also seek to resolve cases efficiently and with consistent outcomes.** Benefits are likely to include higher reporting levels and lower levels of anonymous reporting (which, in turn, support faster resolution of allegations and may signal greater trust).

- **For multinationals, consider internal reporting data by both your headquarters location and by the region of report origination.** These measures sometimes differ, impacting considerations such as timing for training about the reporting program.

- **Promote your reporting channels to both employees and third parties.** Regardless of region, we observe significant levels of reporting activity from outside the organization.

01
Reports per 100 Employees

01 Reports per 100 Employees

Reports per 100 Employees – Median Comparisons

How to calculate: Find the number that reflects all the reports gathered by all reporting channels, divide that number by the number of employees in the organization and then multiply it by 100. For this metric to accurately compare to the calculation we've provided, organizations should not exclude any reports, regardless of *Intake Method*, *Risk Type*, *Substantiation Rate* or *Risk Category*.

NAVEX methodology

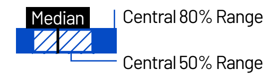
Starting in 2023, NAVEX refined its analysis to include an additional decimal place for each metric to better differentiate year-over-year reporting.

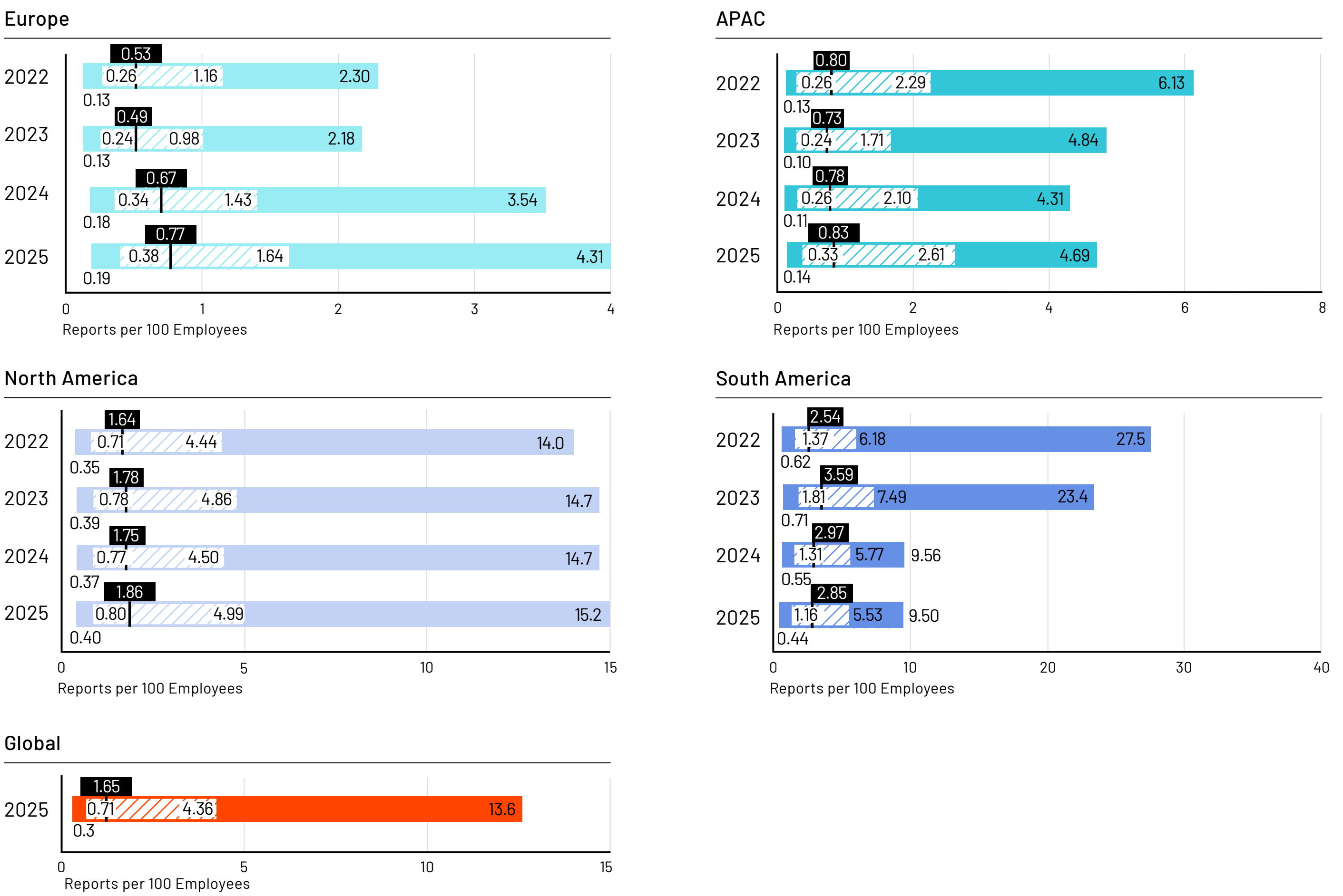
The central 50% range of the distributions were included as an additional refinement to this metric within the overall range graph to better reflect the concentration of report volumes. The smaller bars collocated within the graphs show the range of *Reports per 100 Employees* represented by the central 50%. The full bar represents the central 80% of all organizations.

HQ REGION

REPORTS PER 100 EMPLOYEES – MEDIAN COMPARISONS

Median reporting value (MRV) and ranges by headquarters region



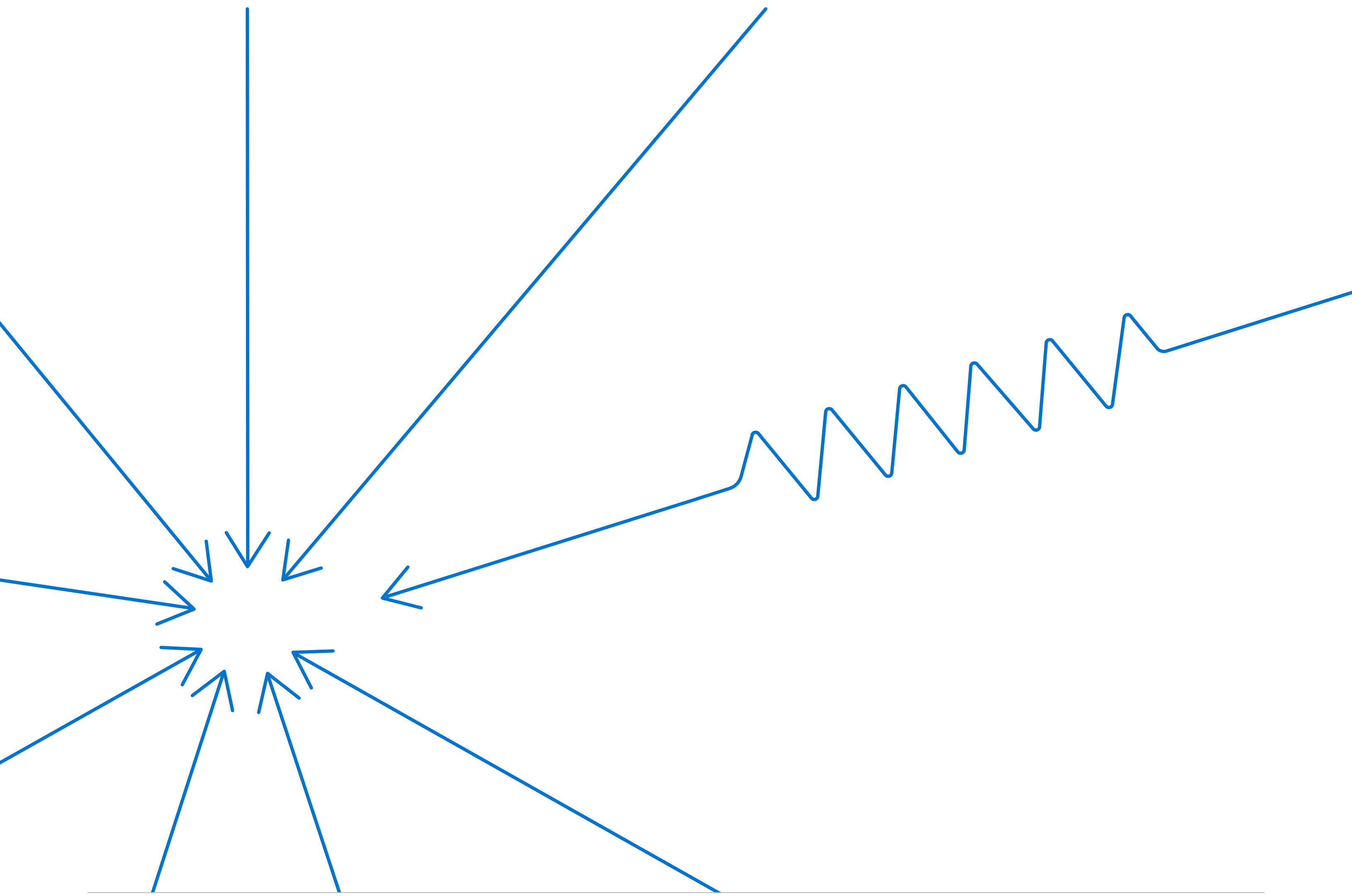


Reports per 100 Employees by Intake Method

How to calculate: First determine which group best reflects your organization's approach. Then conduct the *Reports per 100 Employees* calculation as described previously.

Note regarding reports received via mobile intake:

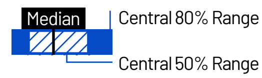
While some organizations requested a breakout of reports received via mobile intake, we found the process of anonymizing the data removes identifiers that would or could be used to flag "mobile" reports. Therefore, "mobile" reports – reports made online through a mobile device – are counted with Web Intake.



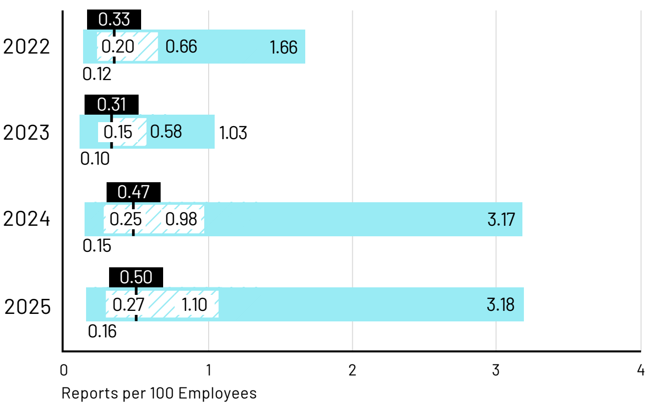
HQ REGION

REPORTS PER 100 EMPLOYEES FOR ORGANIZATIONS THAT TRACK REPORTS FROM WEB AND TELEPHONE ONLY

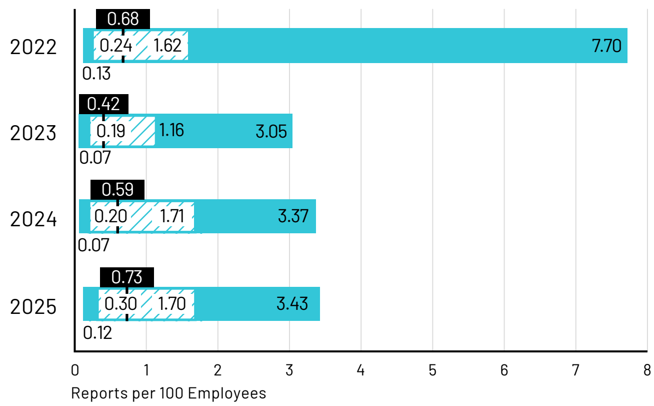
Median reporting value (MRV) by headquarters region



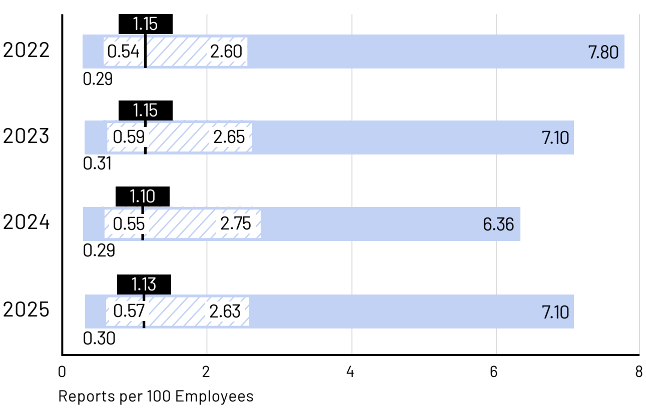
Europe



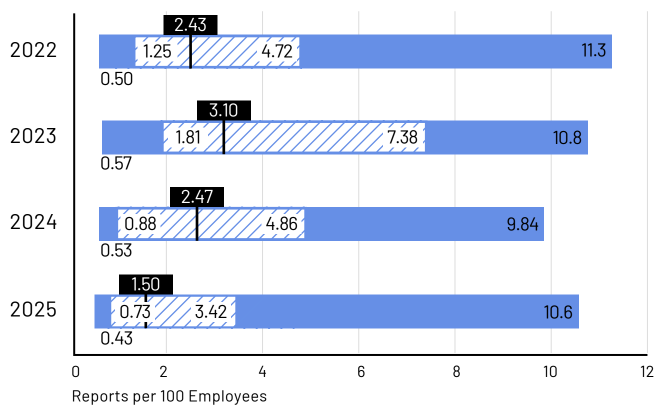
APAC



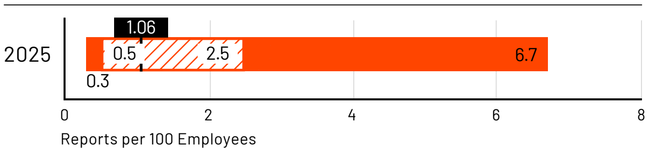
North America



South America



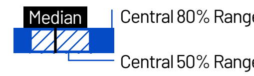
Global



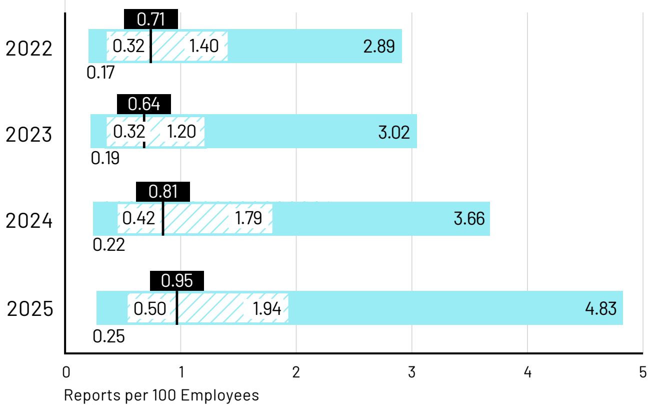
HQ REGION

REPORTS PER 100 EMPLOYEES FOR ORGANIZATIONS THAT TRACK REPORTS FROM ALL SOURCES

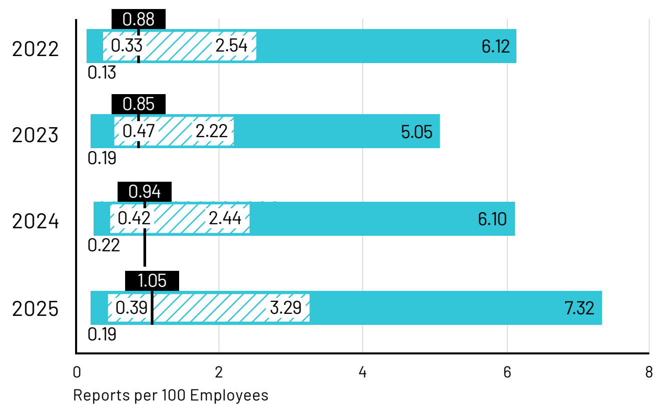
Median reporting value (MRV) by headquarters region



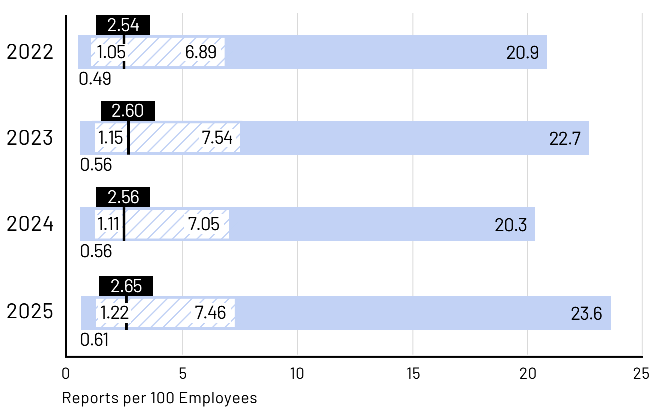
Europe



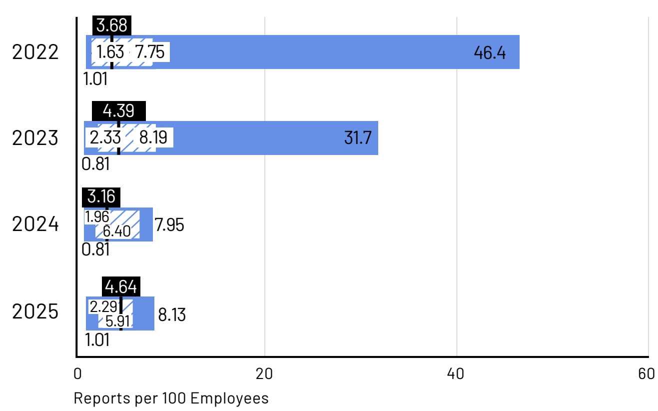
APAC



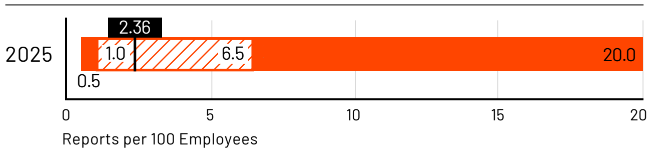
North America



South America



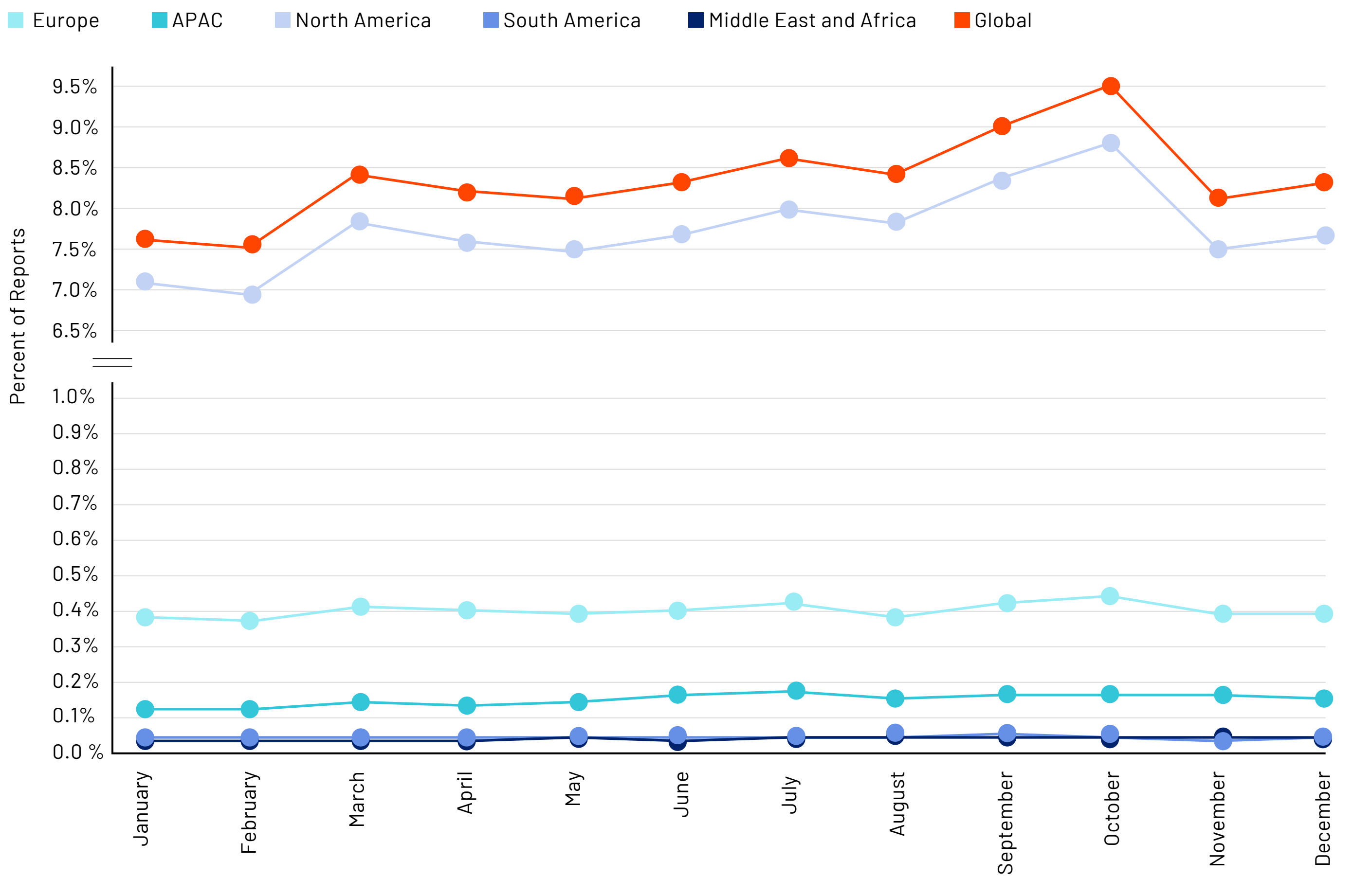
Global



Reports per 100 Employees – Monthly Report Volume Comparison

HQ REGION

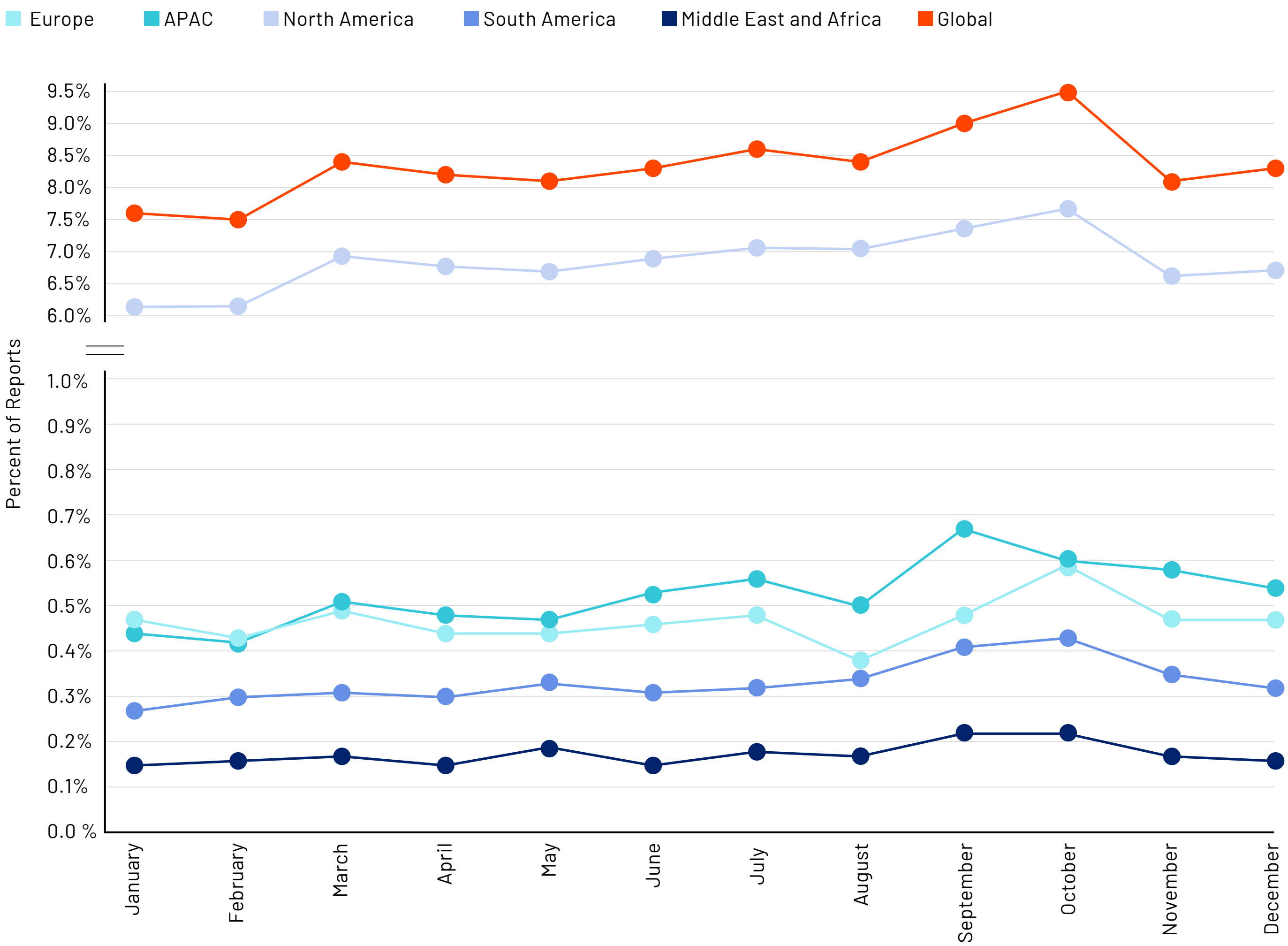
REPORTS PER 100 EMPLOYEES – MONTHLY REPORT VOLUME COMPARISON
Frequency distribution by headquarters region



REPORT ORIGINATION REGION

REPORTS PER 100 EMPLOYEES – MONTHLY REPORT VOLUME COMPARISON

Frequency distribution by report origination region



02
Report Risk Categories and Risk Types

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Report Risk Categories and Risk Types – Risk Categories, Median Comparisons

Receiving reports in a variety of *Risk Categories* and *Risk Types* can be an indication of program effectiveness and help reveal insight into an organization's risk profile. Receiving below-typical volumes could speak to a need for more training or awareness (including on the topic of non-retaliation), while receiving above-typical volumes could indicate employee trust in the reporting system. Higher volumes may also help identify a risk area that may need to be addressed through culture assessment, policy updates and training.

We organize our database into five primary *Risk Categories*, as well as an *Other* category, by grouping together like reports. This allows us to compare all the reports collected, even when individual organizations are utilizing unique labels and naming conventions. We further break down the *Risk Categories* into 24 *Risk Types*.

At NAVEX, we believe the standardization of *Risk Categories* and *Risk Types* across the ethics and compliance industry is important for effective benchmarking. It is more meaningful to understand, and report on, the true nature of issues impacting an organization when *Risk Categories* and *Risk Types* are more standardized. The appendix of this report provides definitions of the 24 *Risk Types*. We hope all organizations will consider adopting a standardized taxonomy going forward to aid consistency and clarity in both benchmark data and their own internal reporting.

> ***NOTE:*** *"Risk Category" and "Risk Type" replaced the previous NAVEX nomenclature of "Benchmark Category" and "Issue Type" in 2024.*

Report Risk Categories

***Risk Categories* are our major grouping of *Risk Types* and are defined as follows:**

Accounting, Auditing and Financial Reporting are reports that pertain to these functions in an organization (e.g., financial misconduct, internal controls, audit).

Business Integrity are reports that address how an organization interacts with third parties, data, legislation, regulations, patients or customers. *Risk Types* include *Bribery and Corruption*, *Conflicts of Interest*, *Vendor/Customer Issues*, *Fraud/Waste/Abuse*, *HIPAA*, *Data Protection*, *Global Trade*, *Human Rights*, *Free and Fair Competition*, *Product Quality/Safety*, and *Insider Trading*.

Workplace Conduct (formerly named *HR, Diversity and Workplace Respect*) are reports that often relate to employee relations or misconduct. *Risk Types* include *Discrimination*, *Harassment*, *Workplace Civility*, *Retaliation*, *Compensation and Benefits*, *Substance Abuse*, and general or *Other HR*.

Environment, Health and Safety are reports that involve an element of safety typically pertaining to employees, environmental regulations, workplace health, or an *Imminent Threat to Persons, Animals or Property* (e.g., EPA compliance, assault or threat of an assault, workplace safety, OSHA).

Misuse or Misappropriation of Assets are reports that specify company assets or time is being wasted or used in a manner other than what is expected (e.g., employee theft, inaccurate expense reporting, time clock abuse).

Other is a category for hard-to-classify reports that might range from complaints about too few snacks in the breakroom to feral cats prowling the corporate parking lot (those are actual reports organizations have received over the years). Historically these *Other* reports were included with *Workplace Conduct* issues, as these issues were typically addressed by Human Resources. Starting in 2021, we report these separately to be more precise in our analysis and keep the Human Resources category as truly HR-related issues.

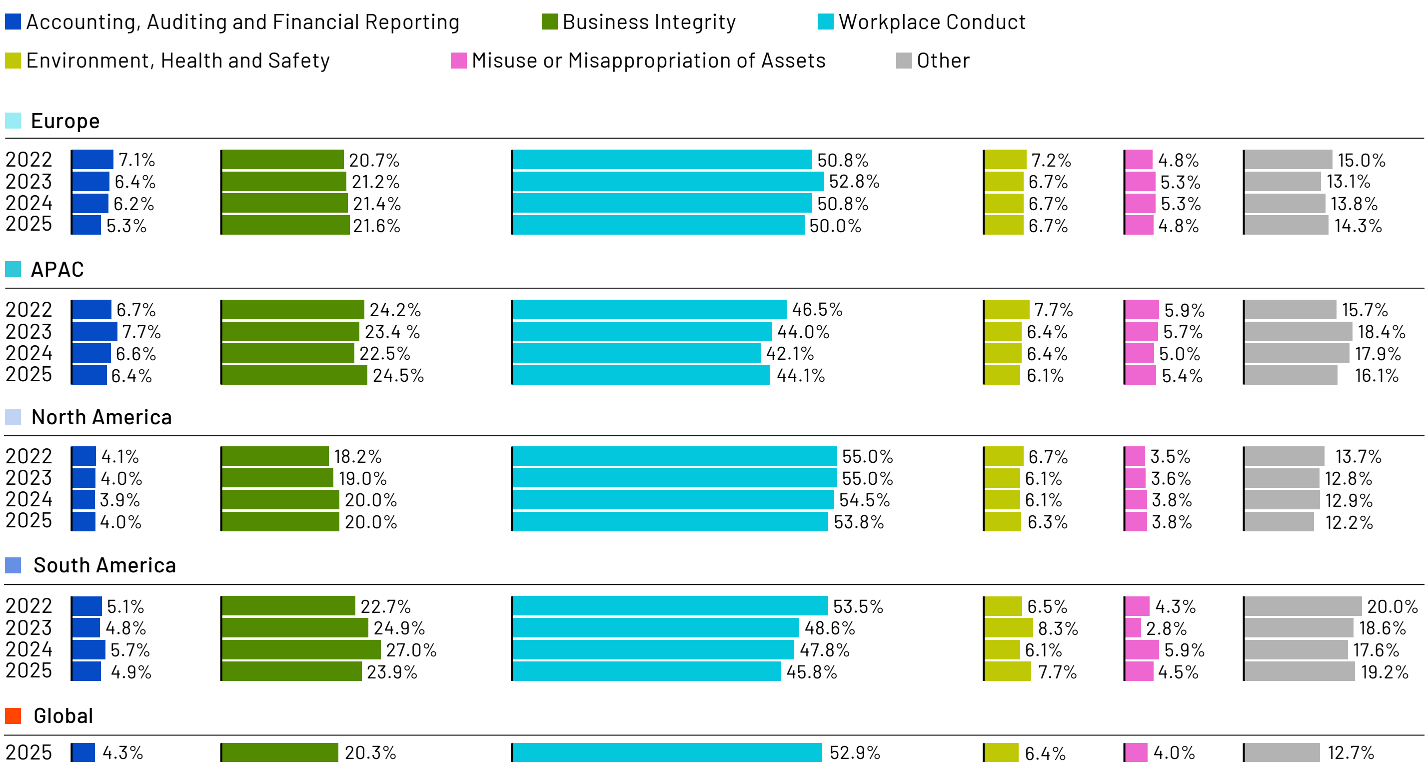
How to calculate: First, ensure each report is sorted into one of the six *Risk Categories* or the *24 Risk Types* as defined in the appendix. Then, divide the number of reports in each of the six categories by the total number of reports. Please note, when we are using the median for each category, the total won't necessarily add up to 100%.

In calculations involving *Risk Category* or *Risk Types* frequency, we categorize the reports and find the frequency among all reports without grouping by organization. Frequency values should total 100%, or close to it due to rounding.

HQ REGION

REPORT RISK CATEGORIES AND RISK TYPES – REPORTS BY RISK CATEGORY, MEDIAN COMPARISONS

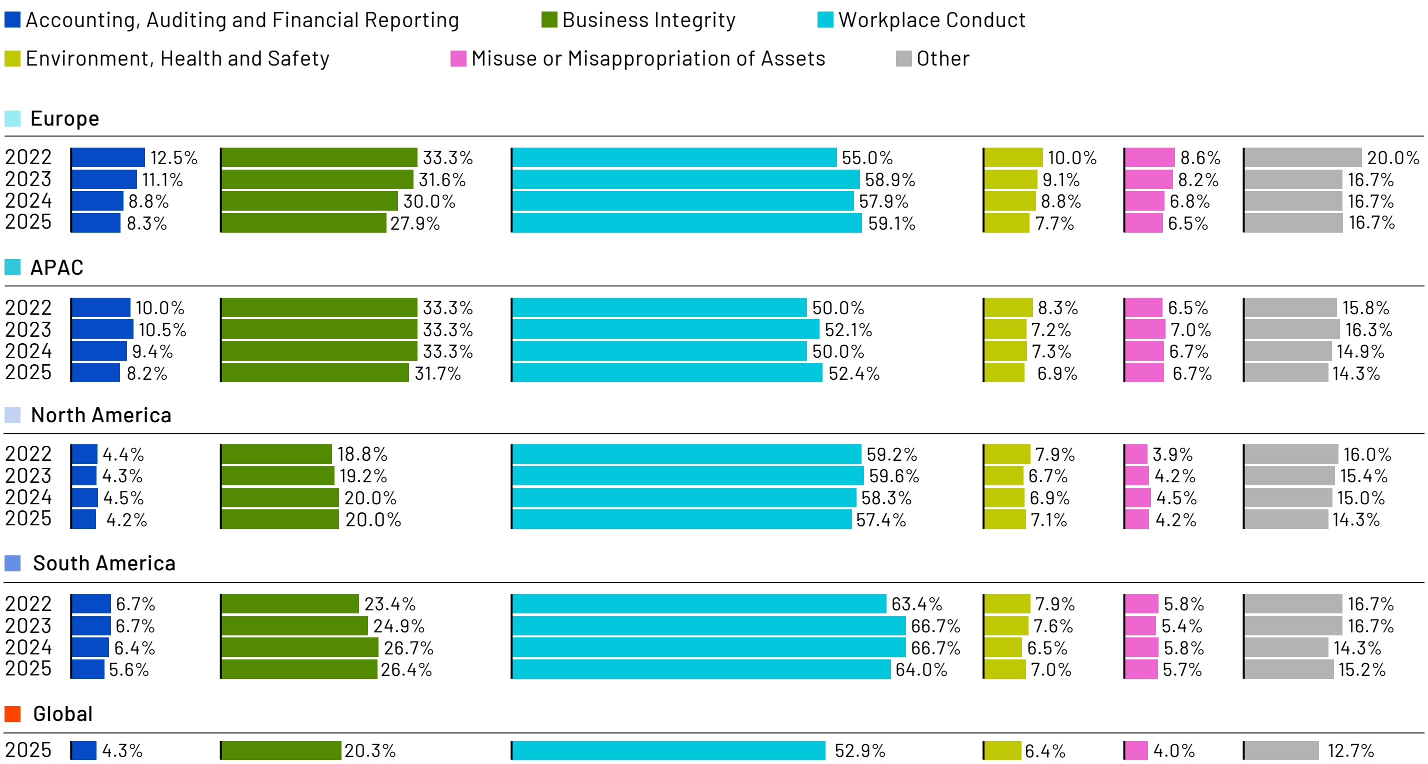
Median reporting value (MRV) by headquarters region



REPORT ORIGINATION REGION

REPORT RISK CATEGORIES AND RISK TYPES – REPORTS BY RISK CATEGORY, MEDIAN COMPARISONS

Median reporting value (MRV) by report origination region



Report Risk Categories and Risk Types – Reports by Risk Type, Frequency Comparisons

HQ REGION

REPORT RISK CATEGORIES AND RISK TYPES – REPORTS BY RISK TYPE, FREQUENCY COMPARISONS

Frequency by headquarters region

Risk Category	Risk Type	Europe		APAC		North America		South America		Global	
		2024	2025	2024	2025	2024	2025	2024	2025	2024	2025
Accounting, Auditing and Financial Reporting	Accounting, Auditing and Financial Reporting	5.23%	**4.36%**	8.12%	**6.68%**	2.18%	**2.06%**	1.59%	**3.03%**	2.46%	**2.28%**
Business Integrity	Bribery and Corruption	1.56%	**1.62%**	1.90%	**1.53%**	0.40%	**0.36%**	1.38%	**1.60%**	0.50%	**0.45%**
	Confidential and Proprietary Information	1.50%	**0.94%**	1.09%	**1.53%**	0.51%	**0.55%**	0.44%	**0.56%**	0.57%	**0.59%**
	Conflicts of Interest	6.80%	**8.12%**	3.58%	**3.49%**	5.16%	**3.80%**	5.87%	**6.06%**	5.21%	**4.02%**
	Data Privacy and Protection	2.33%	**2.58%**	1.04%	**1.21%**	5.21%	**5.57%**	0.54%	**0.28%**	4.95%	**5.30%**
	Free and Fair Competition	0.68%	**0.49%**	0.32%	**0.30%**	0.07%	**0.04%**	0.28%	**0.20%**	0.11%	**0.07%**
	Global Trade	0.14%	**0.25%**	0.13%	**0.03%**	0.05%	**0.07%**	0.03%	**0.06%**	0.06%	**0.08%**
	Human Rights	0.68%	**0.84%**	0.48%	**0.86%**	0.10%	**0.09%**	0.32%	**0.19%**	0.13%	**0.14%**
	Insider Trading	0.08%	**0.09%**	0.05%	**0.06%**	0.02%	**0.03%**	0.03%	**0.04%**	0.02%	**0.03%**
	Other Business Integrity	11.0%	**14.3%**	17.3%	**19.5%**	21.2%	**23.7%**	9.18%	**11.1%**	20.5%	**23.1%**
	Political Activity	0.01%	**0.03%**	0.07%	**0.06%**	0.01%	**0.02%**	0.01%	**-**	0.01%	**0.03%**
	Product Quality and Safety	0.55%	**0.45%**	0.67%	**0.50%**	0.65%	**0.71%**	0.66%	**0.60%**	0.64%	**0.69%**
Workplace Conduct	Compensation and Benefits	0.46%	**0.94%**	0.51%	**0.46%**	2.21%	**1.76%**	0.11%	**0.13%**	2.08%	**1.69%**
	Discrimination	8.21%	**6.77%**	5.36%	**5.18%**	7.07%	**5.55%**	4.99%	**4.49%**	7.09%	**5.59%**
	Harassment	9.29%	**11.2%**	15.8%	**14.0%**	4.17%	**4.05%**	6.66%	**7.98%**	4.69%	**4.62%**
	Other Human Resources	22.4%	**21.2%**	20.8%	**19.5%**	25.5%	**26.5%**	44.0%	**41.4%**	25.3%	**26.2%**
	Retaliation	0.87%	**0.90%**	0.68%	**0.59%**	1.16%	**1.23%**	0.69%	**0.56%**	1.13%	**1.20%**
	Substance Abuse	0.56%	**0.64%**	0.19%	**0.22%**	0.64%	**0.65%**	0.52%	**0.54%**	0.62%	**0.64%**
	Workplace Civility	8.89%	**6.56%**	5.83%	**6.38%**	7.70%	**8.00%**	7.30%	**6.32%**	7.71%	**7.90%**
Environment, Health and Safety	Environment	0.12%	**0.24%**	0.32%	**0.30%**	0.14%	**0.16%**	0.12%	**0.16%**	0.14%	**0.16%**
	Health and Safety	5.12%	**5.55%**	5.27%	**5.00%**	6.88%	**6.71%**	4.82%	**4.10%**	6.75%	**6.60%**
	Imminent Threat to a Person, Animals or Property	0.15%	**0.23%**	0.18%	**0.11%**	0.37%	**0.45%**	0.17%	**0.16%**	0.36%	**0.43%**
Misuse or Misappropriation of Assets	Misuse or Misappropriation of Assets	4.05%	**3.72%**	3.26%	**3.23%**	4.14%	**3.81%**	2.04%	**1.68%**	4.11%	**3.78%**
Other	Other	9.38%	**8.03%**	7.02%	**9.32%**	4.52%	**4.11%**	8.28%	**8.74%**	4.83%	**4.43%**

REPORT ORIGINATION REGION

REPORT RISK CATEGORIES AND RISK TYPES – REPORTS BY RISK TYPE, FREQUENCY COMPARISONS

Frequency by report origination region

Risk Category	Risk Type	Europe		APAC		North America		South America		Global	
		2024	2025	2024	2025	2024	2025	2024	2025	2024	2025
Accounting, Auditing and Financial Reporting	Accounting, Auditing and Financial Reporting	3.91%	3.43%	7.05%	5.35%	1.90%	1.45%	2.93%	3.10%	2.46%	2.28%
Business Integrity	Bribery and Corruption	0.94%	0.97%	1.99%	1.99%	0.23%	0.18%	1.53%	1.57%	0.50%	0.45%
	Confidential and Proprietary Information	1.09%	1.07%	0.94%	1.18%	0.34%	0.38%	0.62%	0.65%	0.57%	0.59%
	Conflicts of Interest	9.63%	10.6%	12.9%	11.6%	4.65%	3.15%	8.07%	7.48%	5.21%	4.02%
	Data Privacy and Protection	5.21%	3.24%	4.10%	4.54%	3.35%	3.23%	1.21%	1.07%	4.95%	5.30%
	Free and Fair Competition	0.33%	0.26%	0.40%	0.27%	0.05%	0.04%	0.48%	0.43%	0.11%	0.07%
	Global Trade	0.28%	0.36%	0.16%	0.23%	0.03%	0.04%	0.05%	0.05%	0.06%	0.08%
	Human Rights	0.33%	0.43%	0.41%	0.53%	0.09%	0.08%	0.82%	0.79%	0.13%	0.14%
	Insider Trading	0.07%	0.05%	0.04%	0.05%	0.01%	0.01%	0.04%	0.05%	0.02%	0.03%
	Other Business Integrity	11.4%	15.4%	11.7%	12.9%	22.6%	25.9%	11.6%	13.1%	20.5%	23.1%
	Political Activity	0.04%	0.05%	0.02%	0.09%	0.01%	0.01%	0.02%	0.01%	0.01%	0.03%
	Product Quality and Safety	0.60%	0.71%	0.49%	0.50%	0.62%	0.72%	0.41%	0.47%	0.64%	0.69%
Workplace Conduct	Compensation and Benefits	1.50%	2.57%	0.49%	0.62%	2.57%	2.06%	0.62%	0.53%	2.08%	1.69%
	Discrimination	7.85%	6.34%	5.59%	4.55%	7.94%	5.87%	8.02%	6.84%	7.09%	5.59%
	Harassment	5.28%	5.90%	7.71%	7.33%	5.23%	5.00%	9.74%	11.0%	4.69%	4.62%
	Other Human Resources	23.7%	22.5%	22.7%	22.0%	24.0%	27.0%	29.3%	27.2%	25.3%	26.2%
	Retaliation	0.76%	0.93%	0.82%	0.93%	1.42%	1.45%	1.27%	1.34%	1.13%	1.20%
	Substance Abuse	0.54%	0.56%	0.18%	0.19%	0.64%	0.68%	0.36%	0.27%	0.62%	0.64%
	Workplace Civility	10.1%	9.33%	7.69%	10.0%	7.78%	8.11%	8.42%	9.64%	7.71%	7.90%
Environment, Health and Safety	Environment	0.15%	0.25%	0.12%	0.17%	0.14%	0.14%	0.14%	0.21%	0.14%	0.16%
	Health and Safety	6.43%	5.73%	5.05%	4.77%	6.71%	6.02%	4.23%	4.17%	6.75%	6.60%
	Imminent Threat to a Person, Animals or Property	0.13%	0.18%	0.17%	0.32%	0.36%	0.48%	0.16%	0.18%	0.36%	0.43%
Misuse or Misappropriation of Assets	Misuse or Misappropriation of Assets	3.89%	3.12%	3.60%	3.02%	4.87%	4.51%	3.05%	2.92%	4.11%	3.78%
Other	Other	5.83%	5.96%	5.72%	6.90%	3.51%	3.51%	7.00%	6.87%	4.83%	4.43%

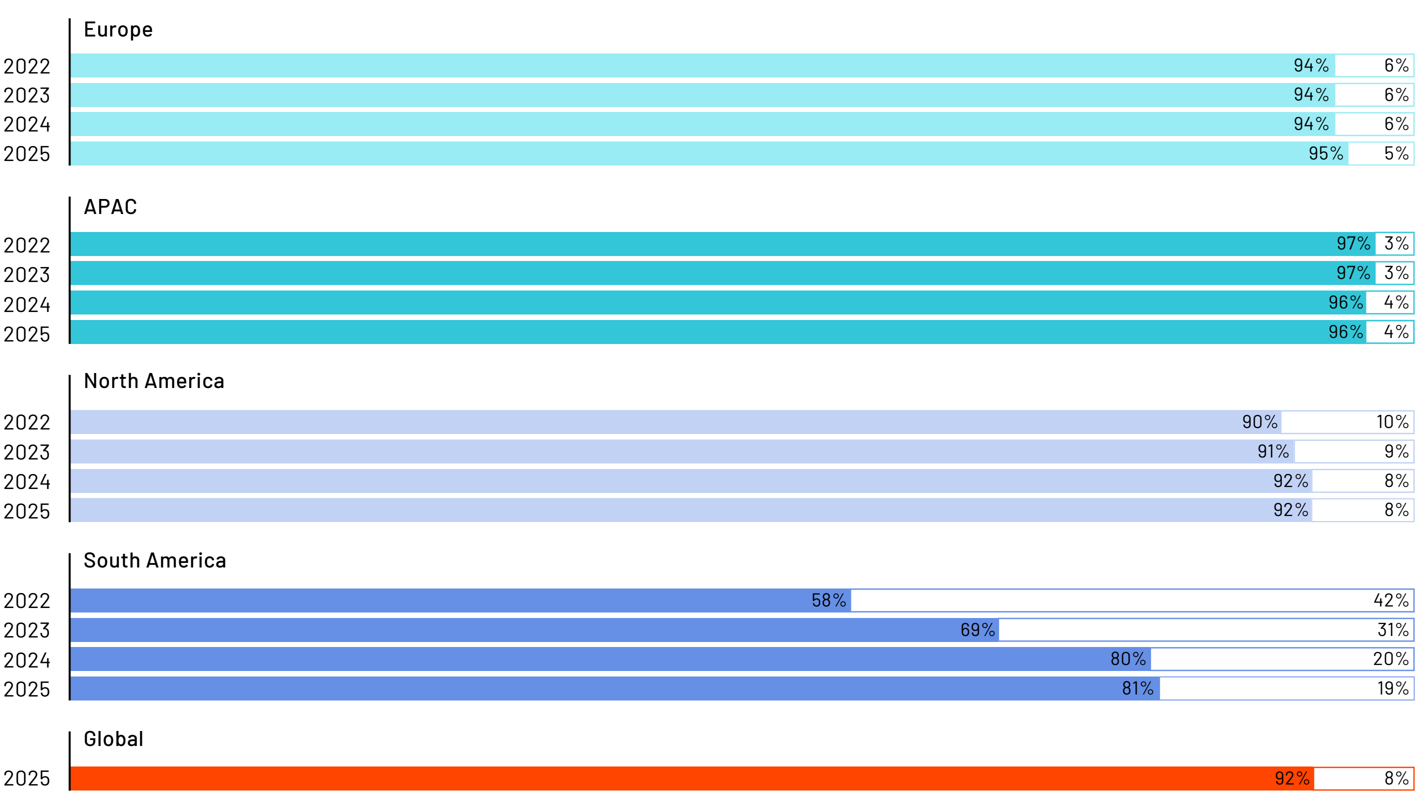
Report Risk Categories and Risk Types – Reporter Allegations Versus Inquiries

How to calculate: Categorize each of your reports as either an inquiry or an allegation. To find your percent of inquiries, divide the number of inquiries by the total number of reports received in the period. Repeat this process for your allegations.

HQ REGION

RISK CATEGORIES AND RISK TYPES – REPORTER ALLEGATIONS VERSUS INQUIRIES
Frequency distribution by headquarters region

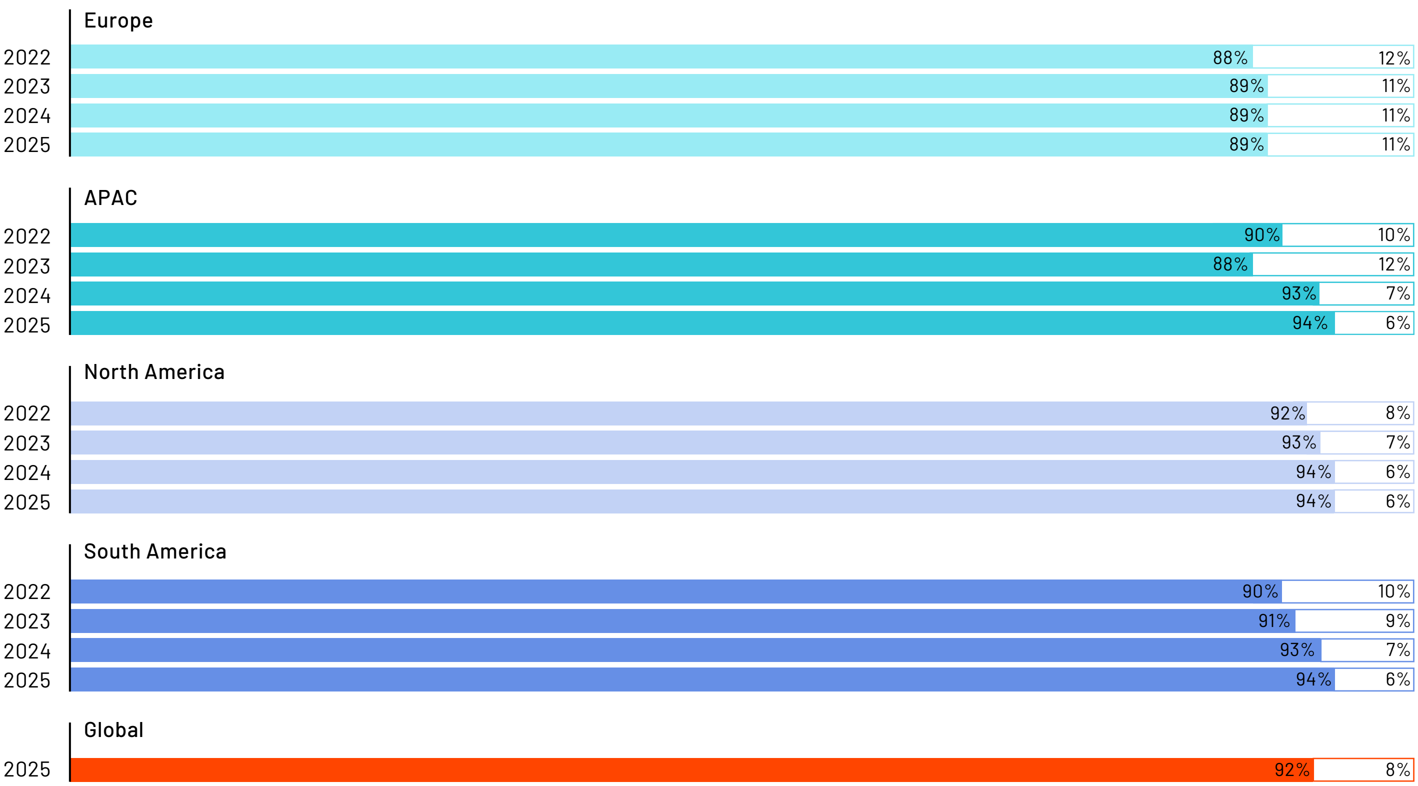
Allegation
Inquiry



REPORT ORIGINATION REGION

RISK CATEGORIES AND RISK TYPES – REPORTER ALLEGATIONS VERSUS INQUIRIES

Frequency distribution by report origination region



03 Anonymous Reporting Rate

03 Anonymous Reporting Rate

Anonymous Reporting Rate – Median Comparisons

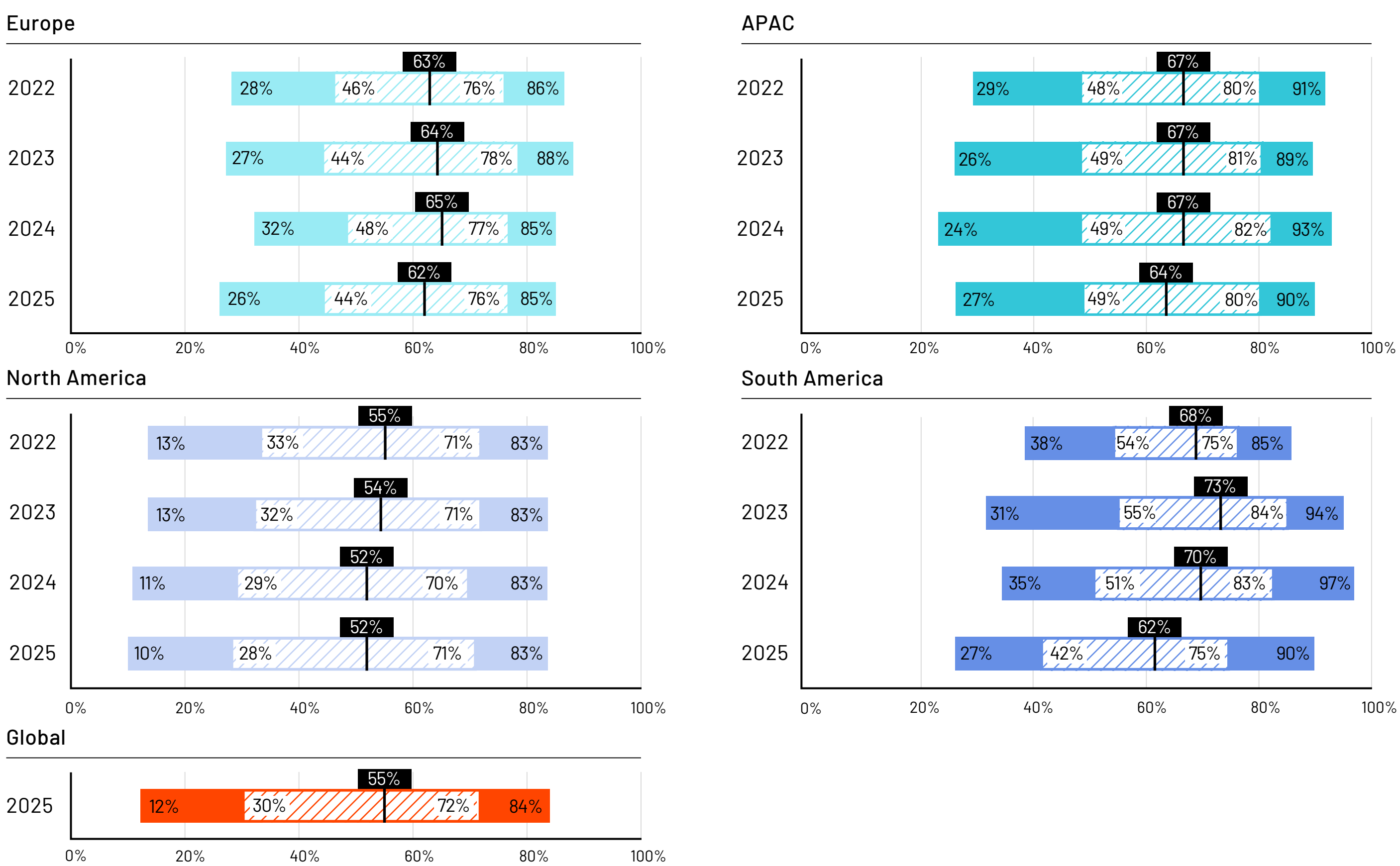
How to calculate: To calculate the percentage of anonymous reports, divide the number of reports submitted by an anonymous reporter by the total number of anonymous and named reports received.

To calculate the percentage of named reports, divide the number of reports submitted by a named reporter by the total number of anonymous and named reports received.

HQ REGION

ANONYMOUS REPORTING RATE – MEDIAN COMPARISONS
Median reporting value (MRV) and ranges by headquarters region

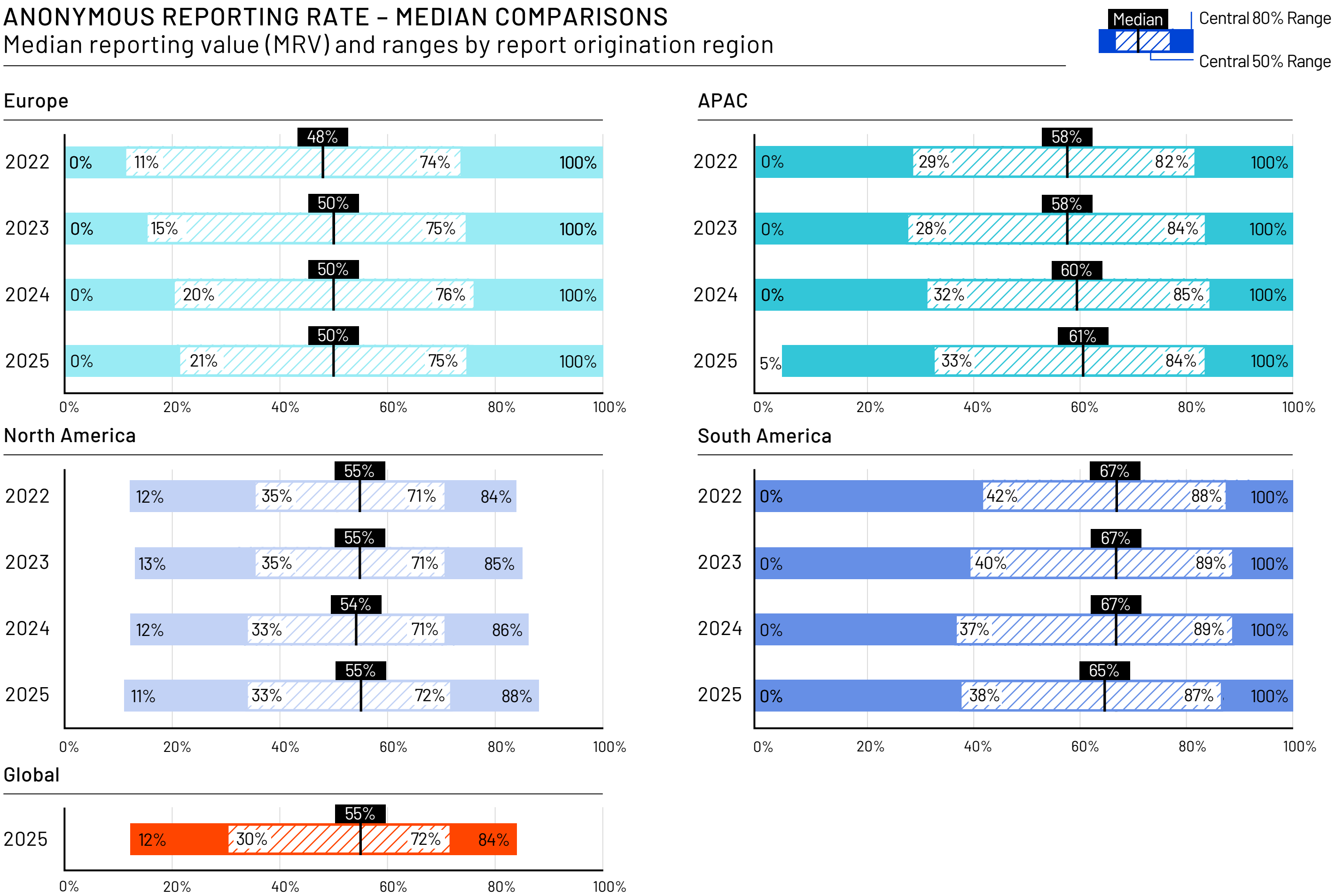
Median | Central 80% Range | Central 50% Range



REPORT ORIGINATION REGION

ANONYMOUS REPORTING RATE – MEDIAN COMPARISONS

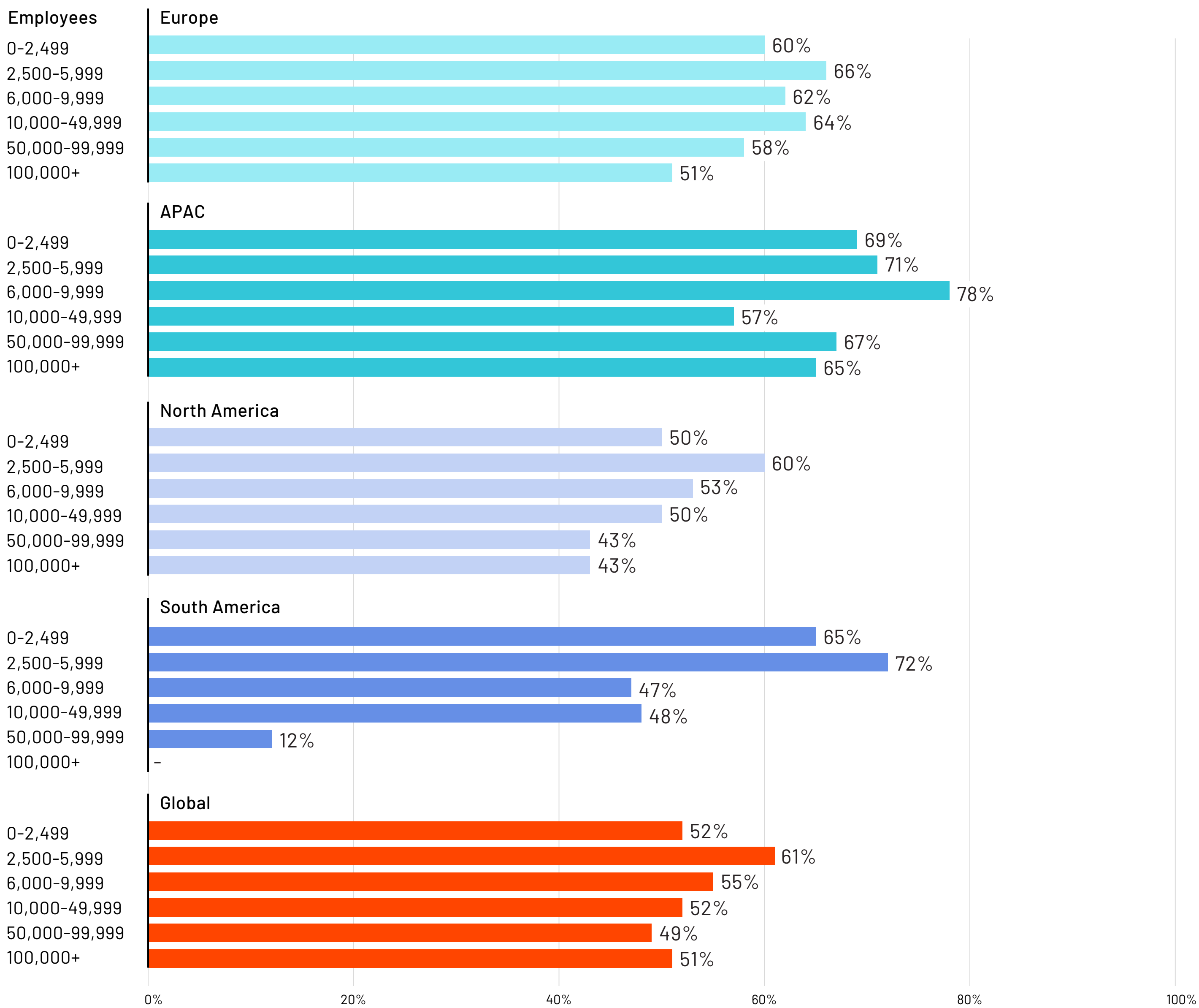
Median reporting value (MRV) and ranges by report origination region



Anonymous Reporting Rate by Organization Employee Count

HQ REGION

ANONYMOUS REPORTING RATE BY ORGANIZATION EMPLOYEE COUNT
Median reporting value (MRV) by headquarters region



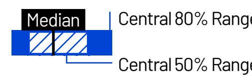
Follow-Up Rate to Anonymous Reports

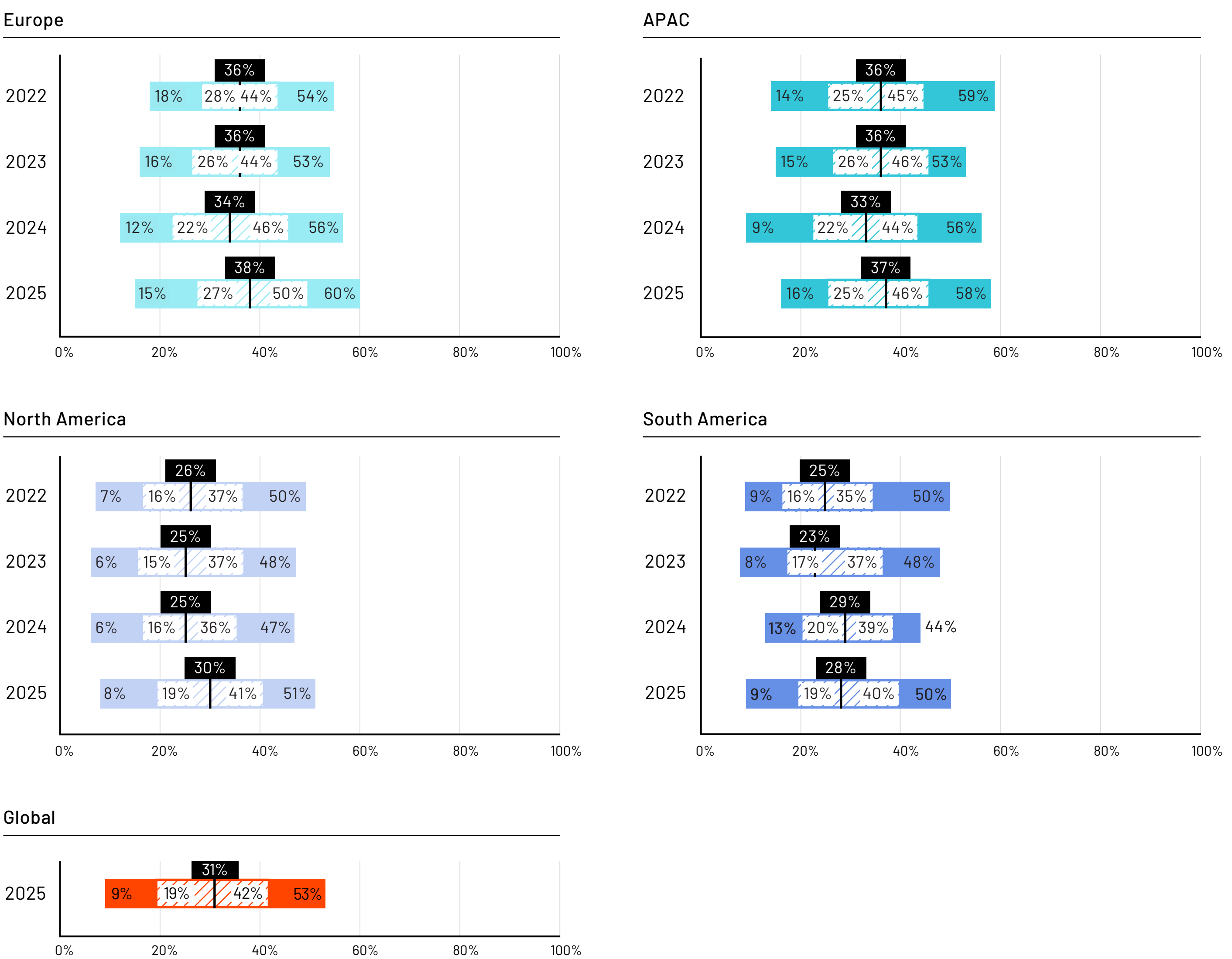
How to calculate: Find the number of reports where the anonymous reporter returned to the system at least once. Divide this number by the total number of anonymous reports received.

Please note, we do not count multiple follow-ups to the same report per metric. If an anonymous reporter returned to the system two times, that report would be counted once.

HQ REGION

ANONYMOUS REPORTING RATE – FOLLOW-UP RATE TO ANONYMOUS REPORTS
Median reporting value (MRV) and ranges by headquarters region

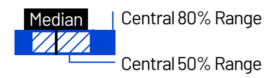


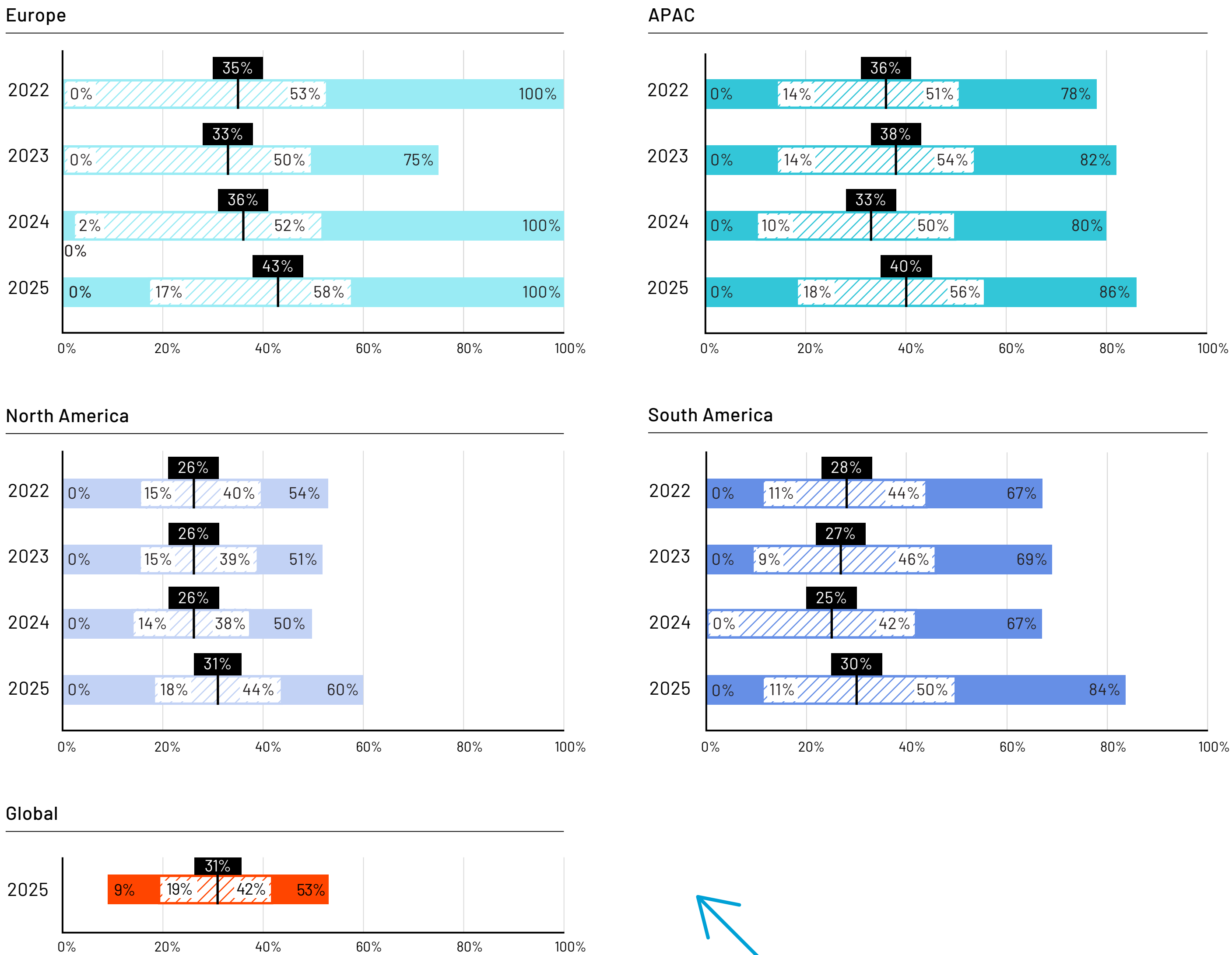


REPORT ORIGINATION REGION

ANONYMOUS REPORTING RATE – FOLLOW-UP RATE TO ANONYMOUS REPORTS

Median reporting value (MRV) and ranges by report origination region





04 Substantiation Rate

04 Substantiation Rate

How to calculate: For overall *Substantiation Rate*: Divide the number of allegation reports that were closed as substantiated or partially substantiated by the total number of allegation reports that were closed as substantiated/partially substantiated or unsubstantiated as defined in this section. We also note there is a category described as "insufficient information" which is excluded from these calculations.

1. Substantiated

Substantiated reports, when investigated, are determined to be correct or partially correct as reported

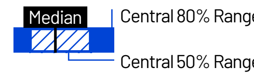
2. Unsubstantiated

Unsubstantiated reports, when investigated, are determined to be inaccurate as reported

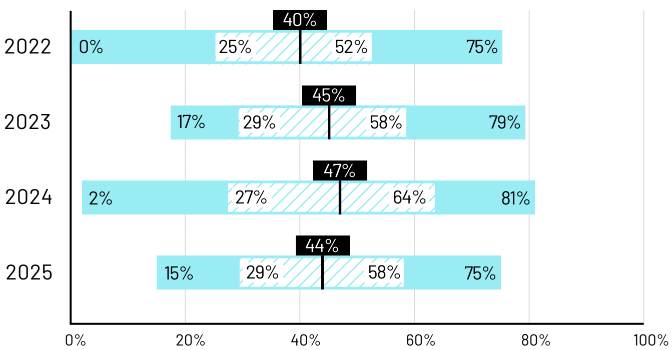
HQ REGION

SUBSTANTIATION RATE – MEDIAN COMPARISONS

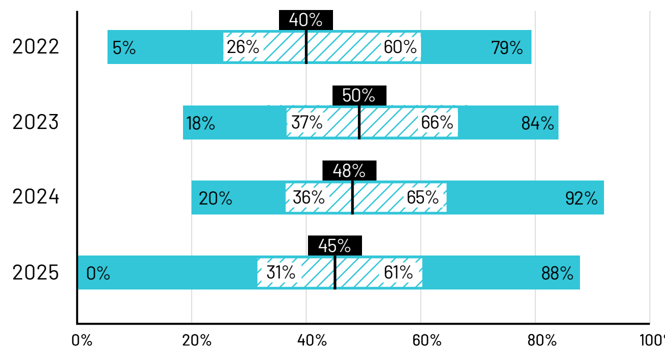
Median reporting value (MRV) and ranges by headquarters region



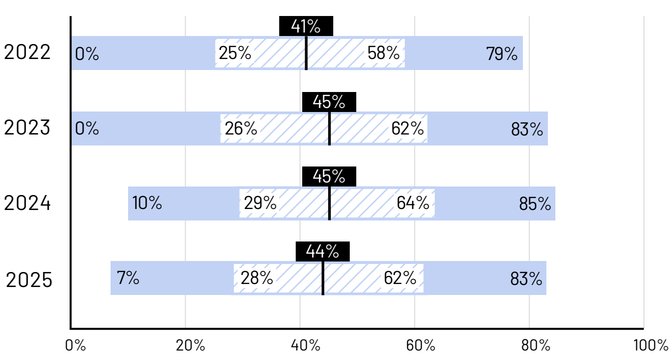
Europe



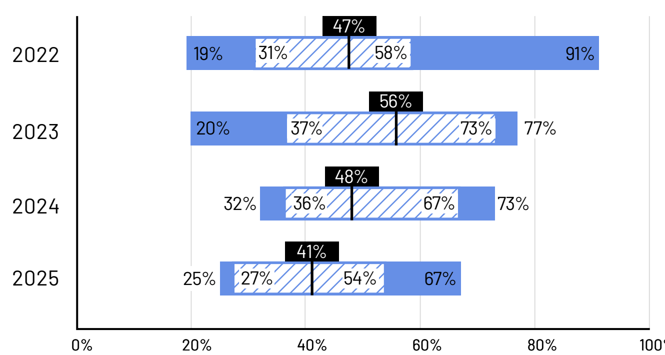
APAC



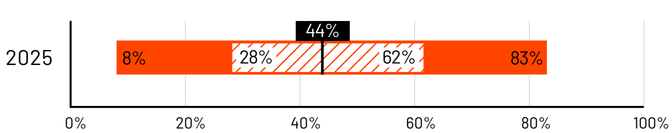
North America



South America



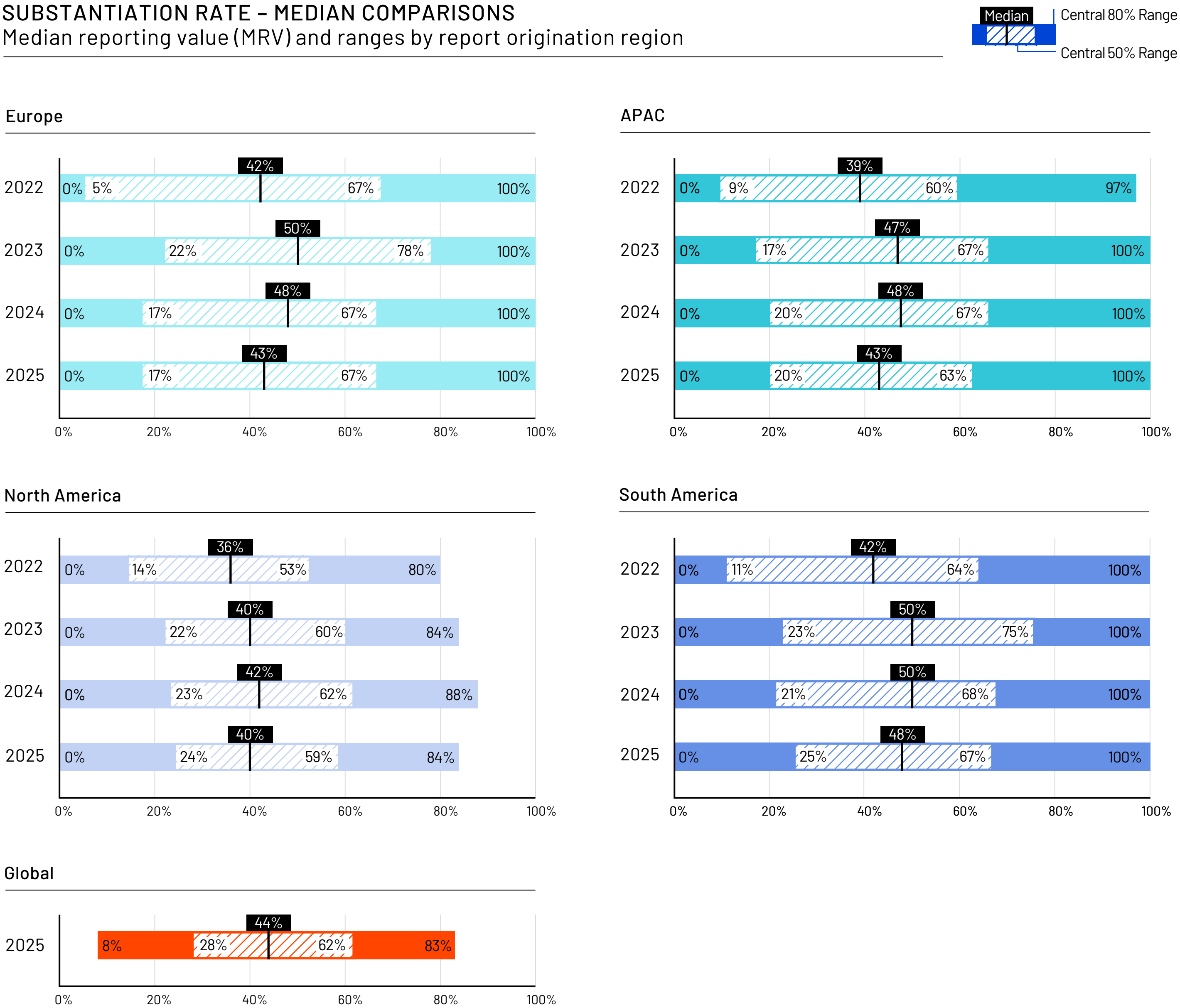
Global



REPORT ORIGINATION REGION

SUBSTANTIATION RATE – MEDIAN COMPARISONS

Median reporting value (MRV) and ranges by report origination region

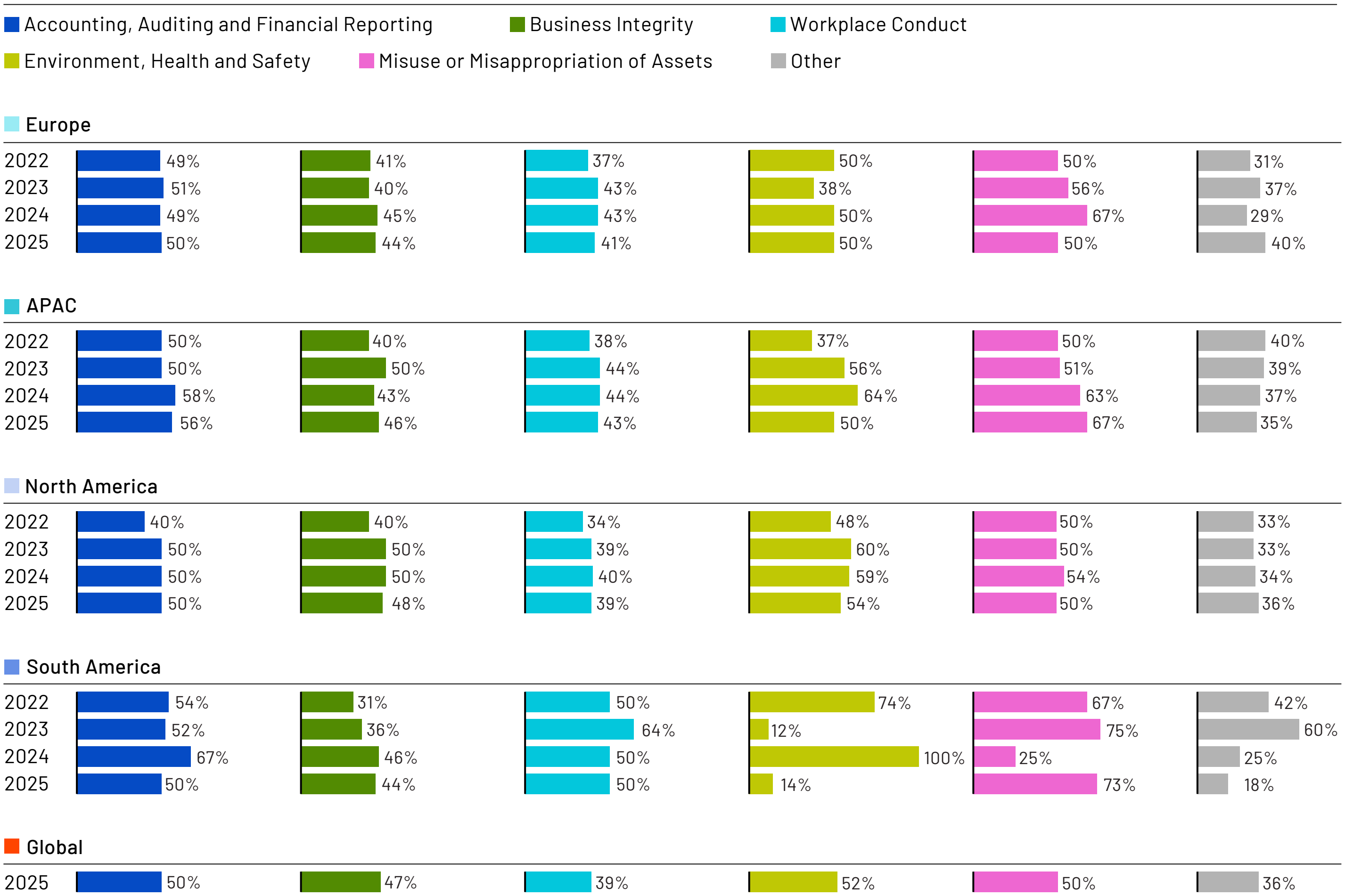


Substantiation Rate by Risk Category

HQ REGION

SUBSTANTIATION RATE BY RISK CATEGORY

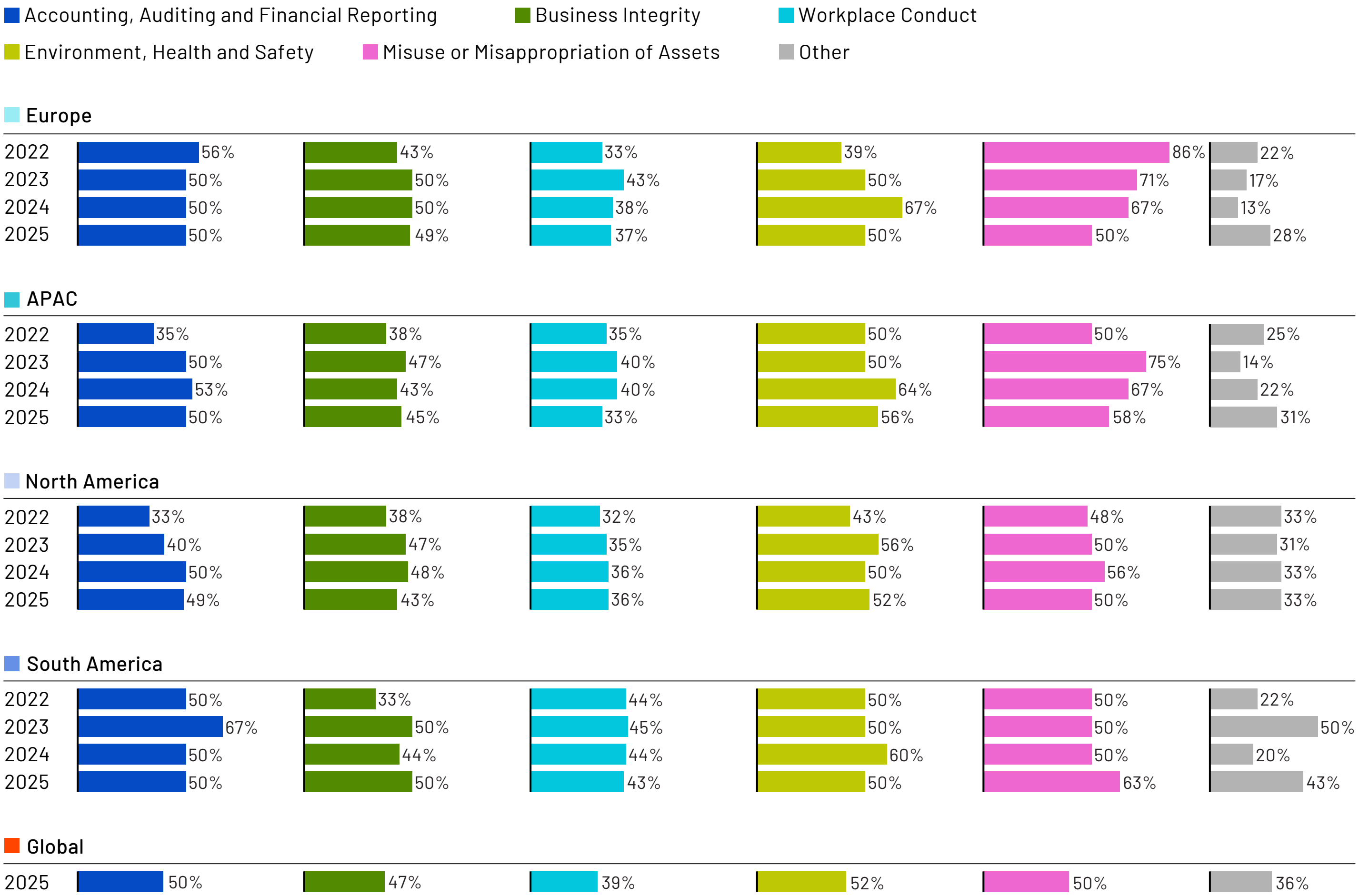
Median reporting value (MRV) by headquarters region



REPORT ORIGINATION REGION

SUBSTANTIATION RATE BY RISK CATEGORY

Median reporting value (MRV) by report origination region

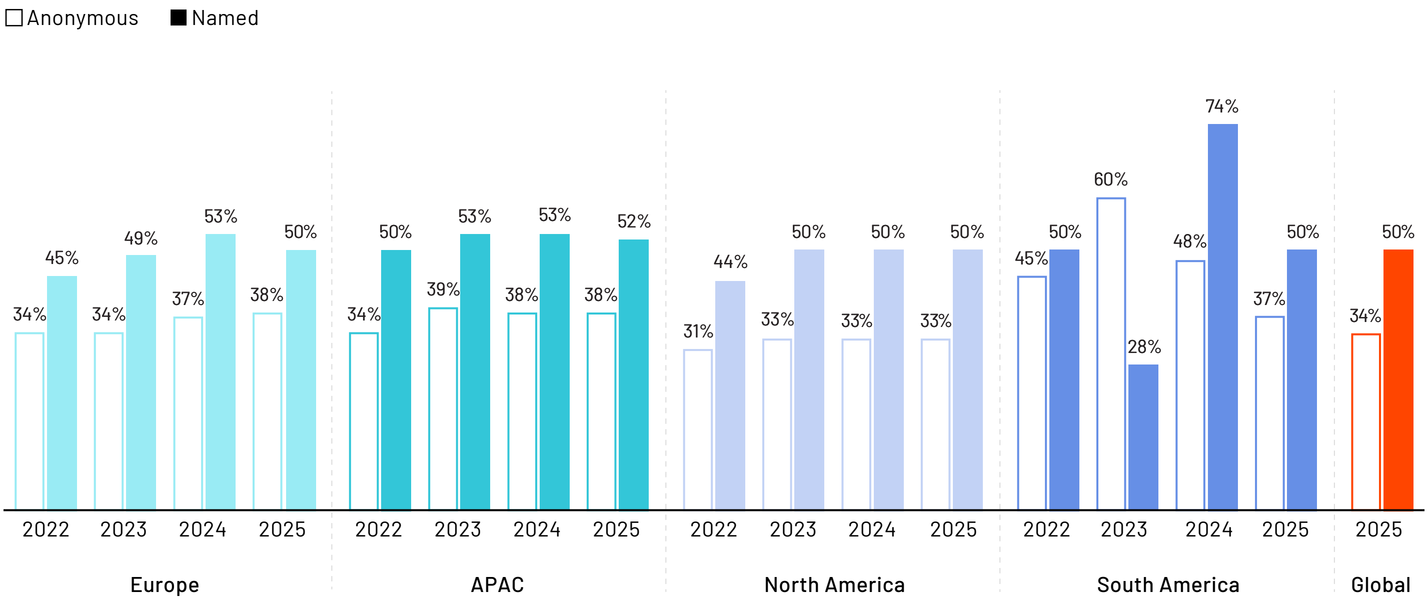


Substantiation Rate of Anonymous Versus Named Reports

HQ REGION

SUBSTANTIATION RATE OF ANONYMOUS VERSUS NAMED REPORTS

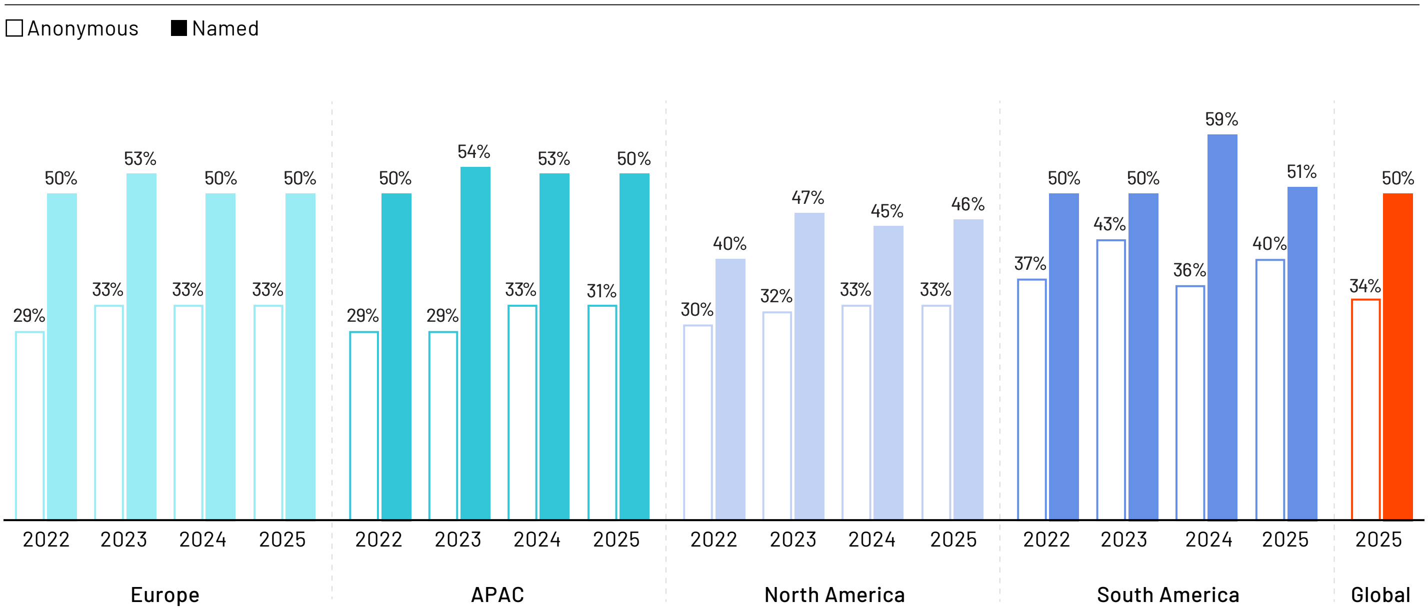
Median reporting value (MRV) for anonymous substantiation by headquarters region



REPORT ORIGINATION REGION

SUBSTANTIATION RATE OF ANONYMOUS VERSUS NAMED REPORTS

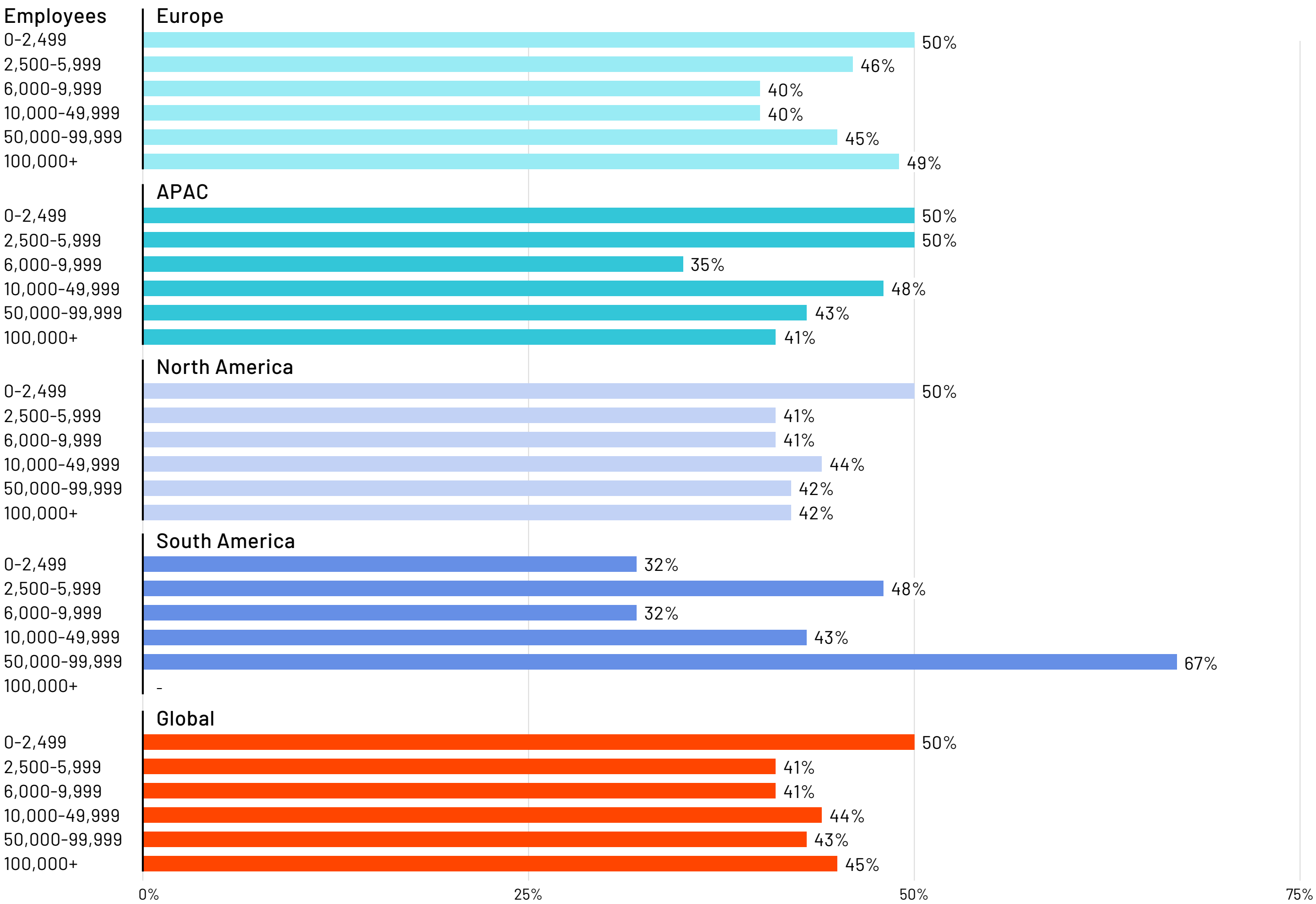
Median reporting value (MRV) for anonymous substantiation by report origination region



Substantiation Rate by Employee Count

HQ REGION

SUBSTANTIATION RATE BY EMPLOYEE COUNT
Median reporting value (MRV) for anonymous substantiation by headquarters region



05 Case Closure Time

05 Case Closure Time

Case Closure Time – Median Comparisons

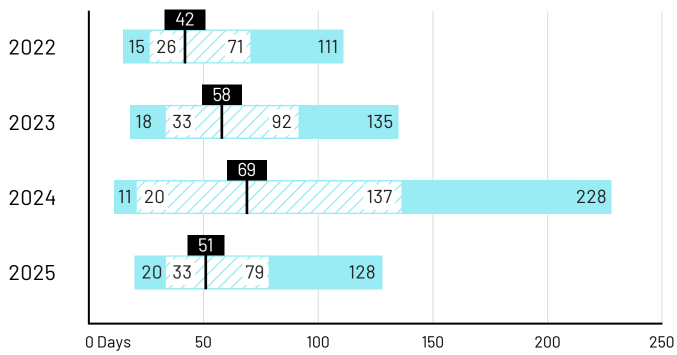
How to calculate: Calculate the number of days between the date a report is received and the date it is closed for each report. For median values, find the middle point of the data – this is an important metric to explore, as it helps lessen the impact of outliers that can have a major impact on overall metrics.

HQ REGION

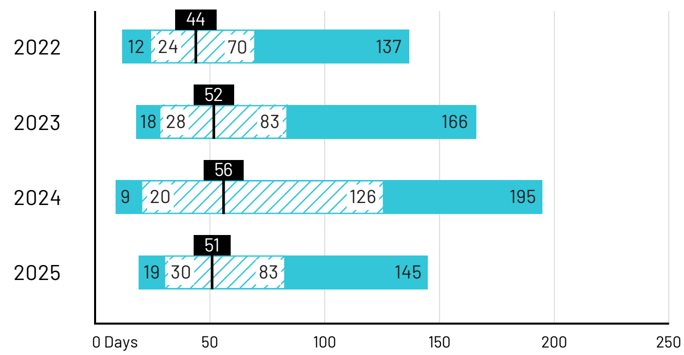
CASE CLOSURE TIME – MEDIAN COMPARISONS

Median reporting value (MRV) by headquarters region

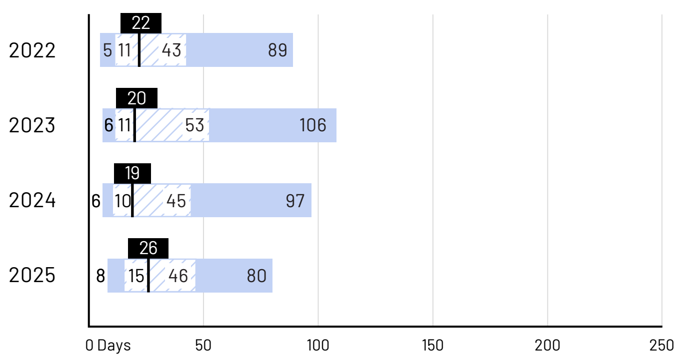
Europe



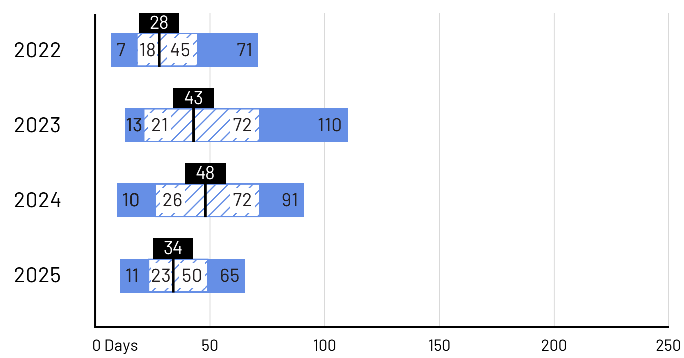
APAC



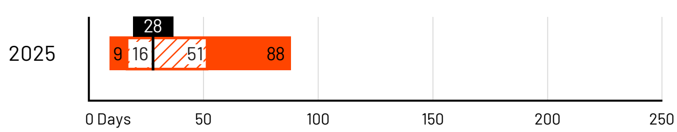
North America



South America



Global

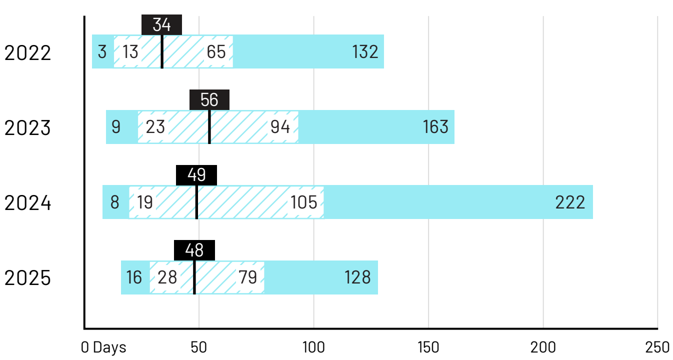


REPORT ORIGINATION REGION

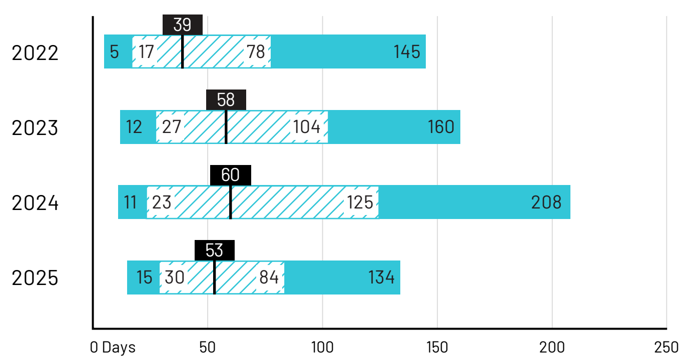
CASE CLOSURE TIME – MEDIAN COMPARISONS

Median reporting value (MRV) by report origination region

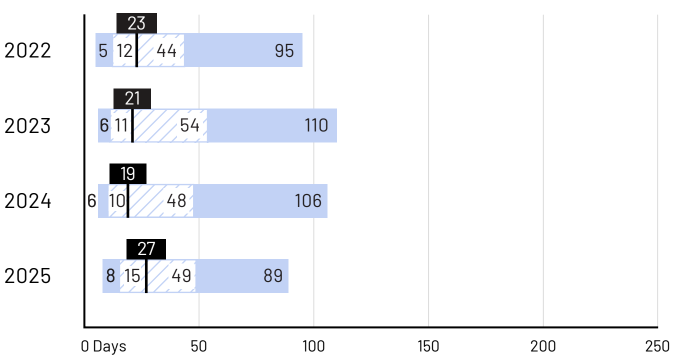
Europe



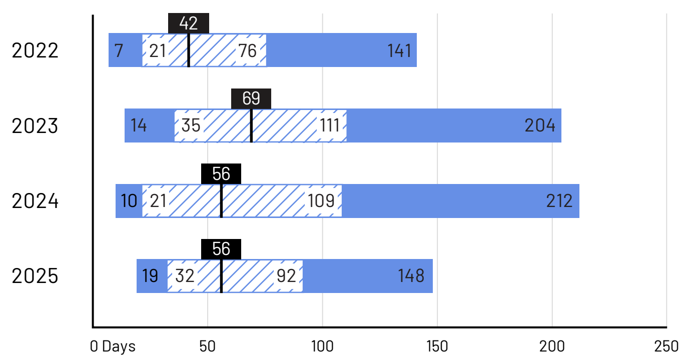
APAC



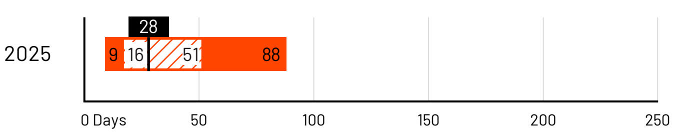
North America



South America



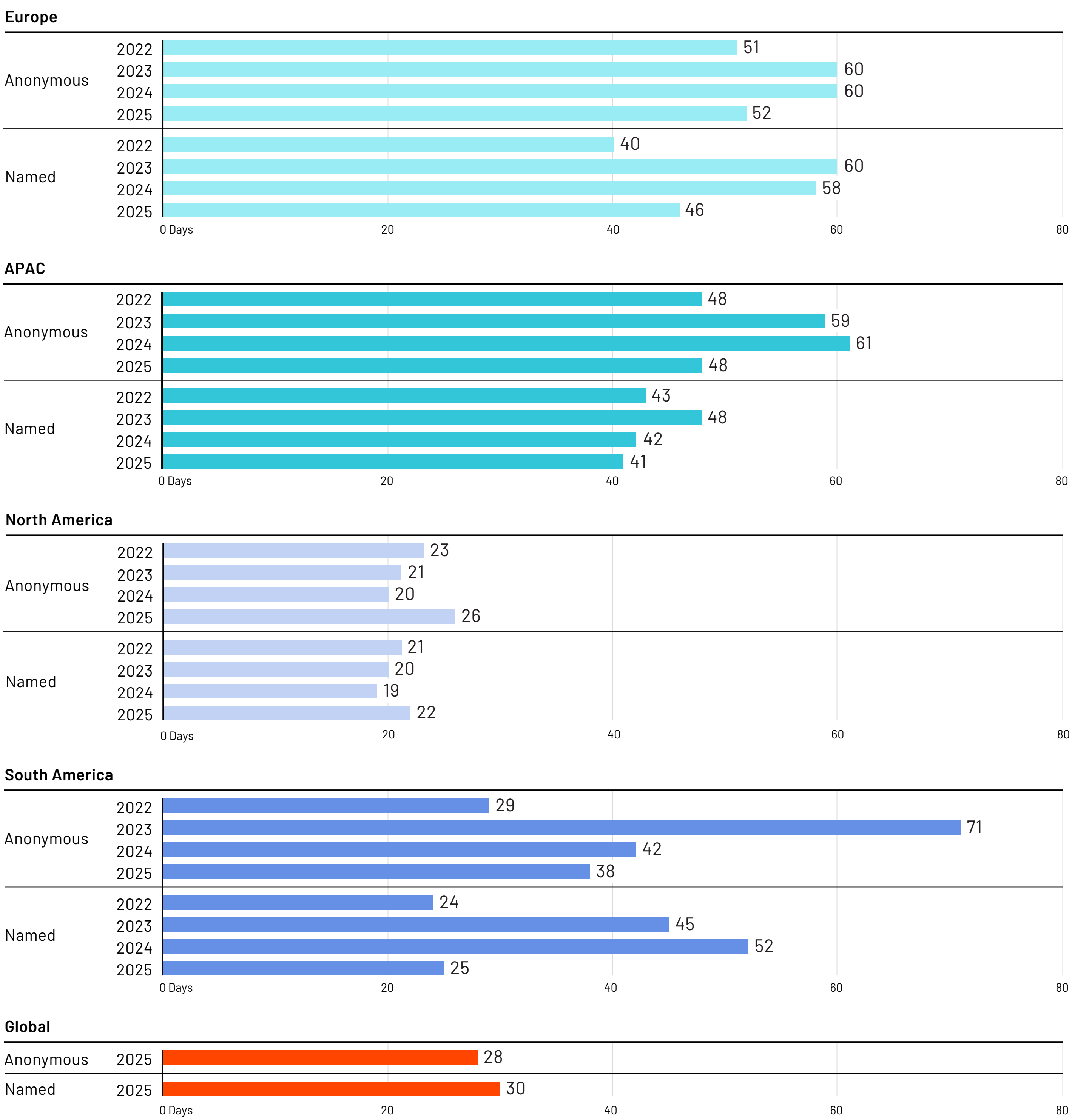
Global



Case Closure Time by Anonymous Versus Named Reports

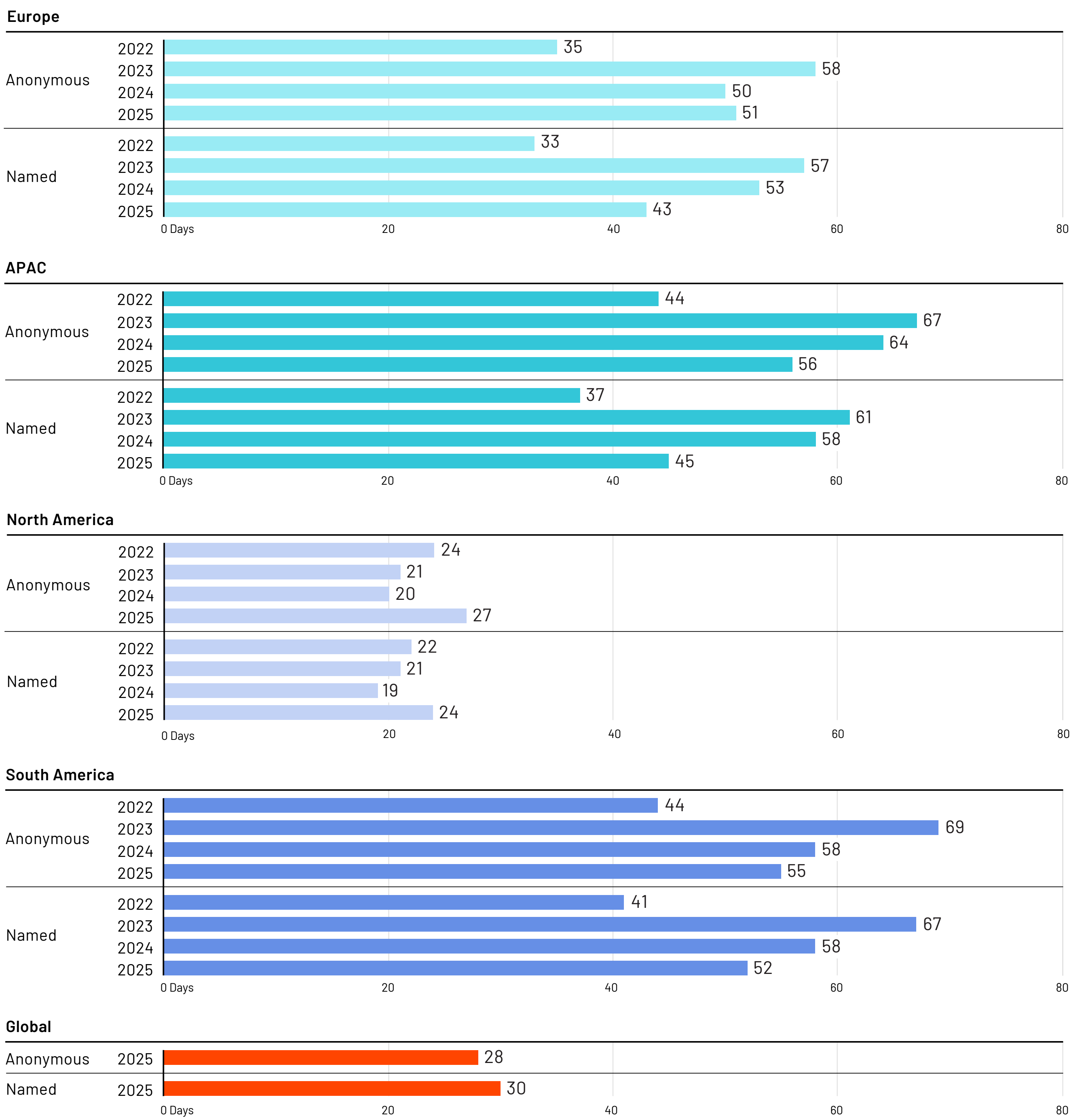
HQ REGION

CASE CLOSURE TIME BY ANONYMOUS VERSUS NAMED REPORTS
Median reporting value (MRV) by headquarters region



REPORT ORIGINATION REGION

CASE CLOSURE TIME BY ANONYMOUS VERSUS NAMED REPORTS
Median reporting value (MRV) by report origination region



06

Time Difference Between Incident and Report Date

06 Time Difference Between Incident and Report Date

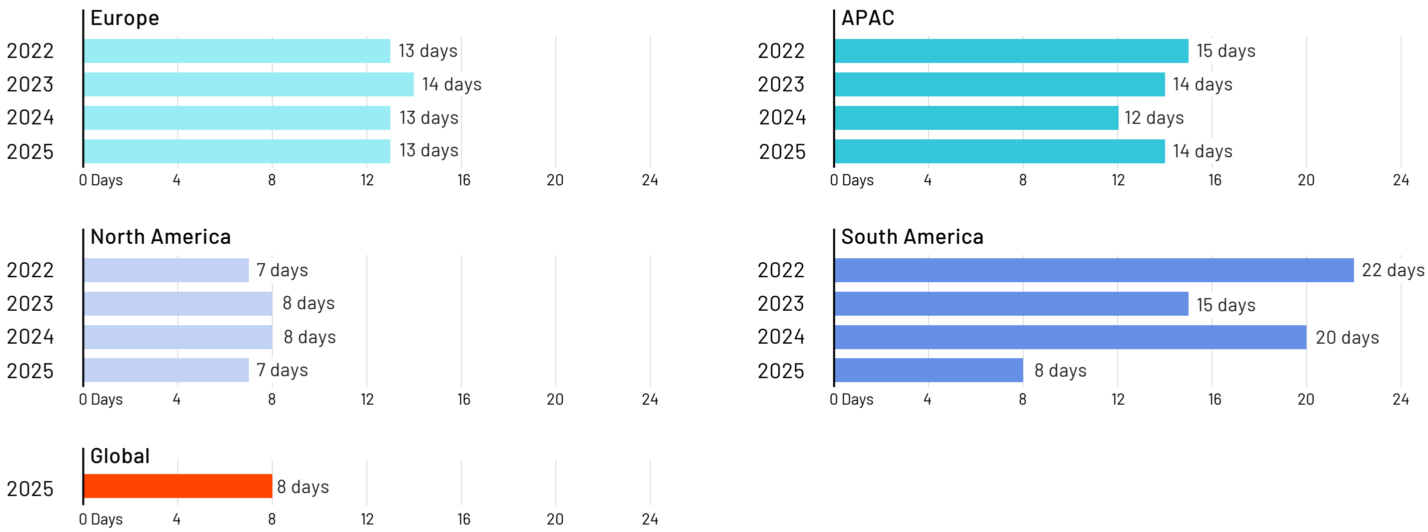
Time Difference Between Incident and Report Date – Median Comparisons

How to calculate: Find the time difference between the alleged incident date and the date the report was made for each report. For median values, find the middle point of the data – this is an important metric to explore, as it helps lessen the impact of outliers that can have a major impact on overall metrics.

HQ REGION

TIME DIFFERENCE BETWEEN INCIDENT AND REPORT DATE, MEDIAN COMPARISONS

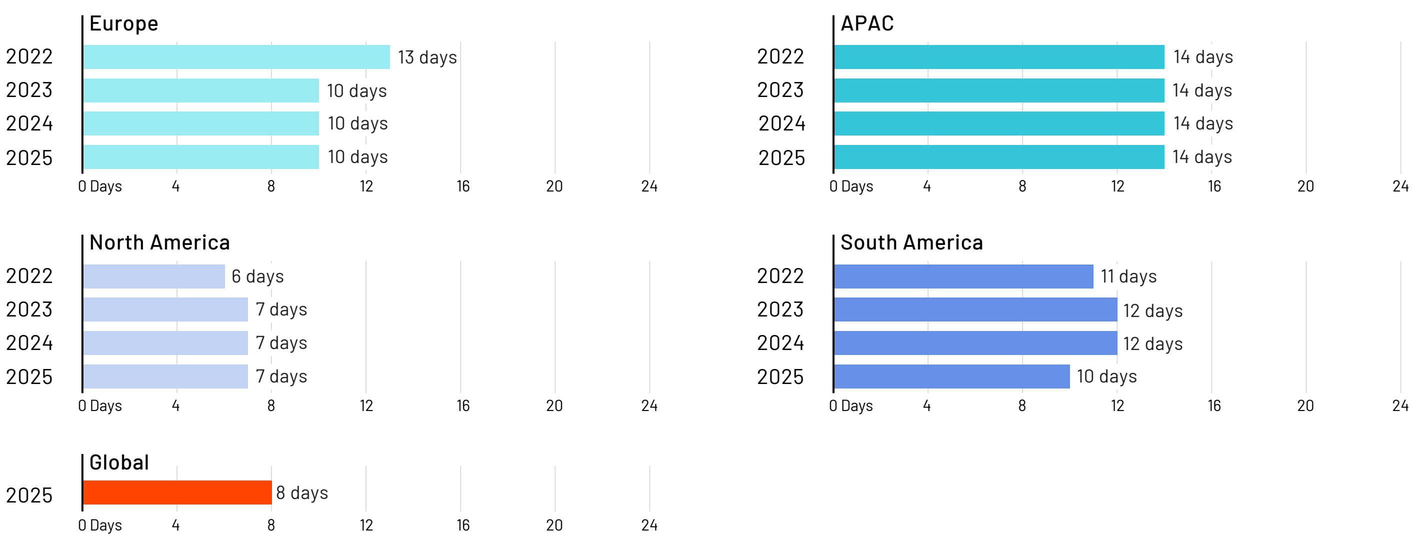
Median reporting value (MRV) by headquarters region



REPORT ORIGINATION REGION

TIME DIFFERENCE BETWEEN INCIDENT AND REPORT DATE, MEDIAN COMPARISONS

Median reporting value (MRV) by report origination region



Time Difference Between Incident and Report Date by Risk Category

HQ REGION

TIME DIFFERENCE BETWEEN INCIDENT AND REPORT DATE BY RISK CATEGORY
Median reporting value (MRV) by headquarters region

Region	Year	Accounting, Auditing and Financial Reporting	Business Integrity	Workplace Conduct	Environment, Health and Safety	Misuse or Misappropriation of Assets	Other
Europe	2023	26 days	13 days	9 days	8 days	12 days	12 days
	2024	15 days	12 days	14 days	6 days	18 days	5 days
	2025	19 days	12 days	14 days	11 days	16 days	8 days
APAC	2023	60 days	14 days	13 days	12 days	11 days	16 days
	2024	33 days	14 days	16 days	8 days	12 days	8 days
	2025	18 days	11 days	12 days	7 days	12 days	26 days
North America	2023	16 days	8 days	7 days	4 days	9 days	6 days
	2024	16 days	8 days	7 days	4 days	8 days	5 days
	2025	14 days	8 days	7 days	4 days	9 days	7 days
South America	2023	32 days	16 days	9 days	56 days	12 days	–
	2024	26 days	23 days	18 days	3 days	14 days	8 days
	2025	20 days	7 days	5 days	7 days	44 days	6 days
Global	2025	15 days	8 days	8 days	5 days	9 days	7 days

REPORT ORIGINATION REGION

TIME DIFFERENCE BETWEEN INCIDENT AND REPORT DATE BY RISK CATEGORY

Median reporting value (MRV) by report origination region

Region	Year	Accounting, Auditing and Financial Reporting	Business Integrity	Workplace Conduct	Environment, Health and Safety	Misuse or Misappropriation of Assets	Other
Europe	2023	15 days	10 days	10 days	7 days	12 days	6 days
Europe	2024	17 days	8 days	12 days	7 days	12 days	5 days
Europe	2025	20 days	13 days	11 days	6 days	11 days	8 days
APAC	2023	57 days	14 days	14 days	9 days	14 days	6 days
APAC	2024	26 days	11 days	13 days	6 days	16 days	7 days
APAC	2025	25 days	12 days	16 days	6 days	15 days	9 days
North America	2023	14 days	7 days	7 days	4 days	8 days	5 days
North America	2024	13 days	7 days	7 days	4 days	7 days	5 days
North America	2025	14 days	8 days	7 days	4 days	8 days	6 days
South America	2023	50 days	10 days	14 days	8 days	12 days	18 days
South America	2024	31 days	13 days	11 days	6 days	11 days	16 days
South America	2025	13 days	10 days	10 days	6 days	9 days	8 days
Global	2025	15 days	8 days	8 days	5 days	9 days	7 days

07

Report Intake Method

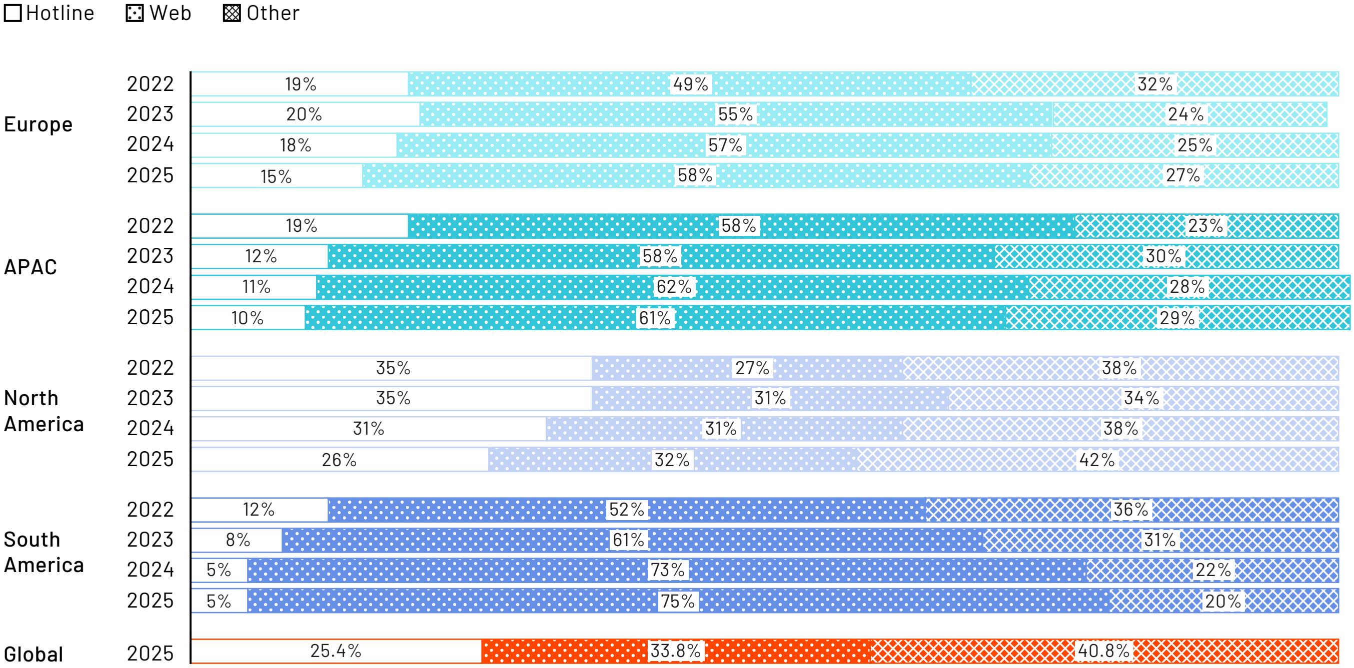
07 Report Intake Method

How to calculate: When calculating your report frequency by intake method, group all non-hotline and non-web intake reports such as open-door, email, postal mail, fax and manager submissions together as Other Intake. Then total up the number of reports received by each channel – hotline, web and other methods, and divide each by the total number of reports.

HQ REGION

REPORT INTAKE METHOD – FREQUENCY COMPARISON

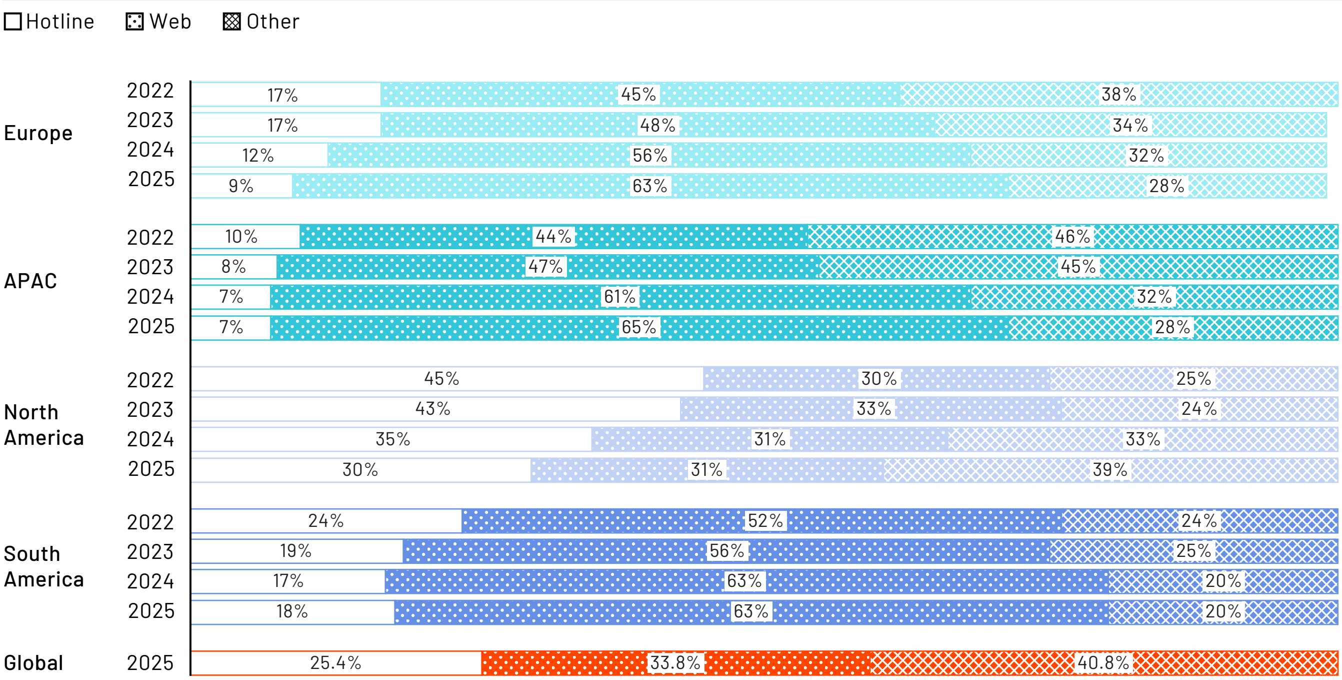
Frequency by headquaters region



REPORT ORIGINATION REGION

REPORT INTAKE METHOD – FREQUENCY COMPARISON

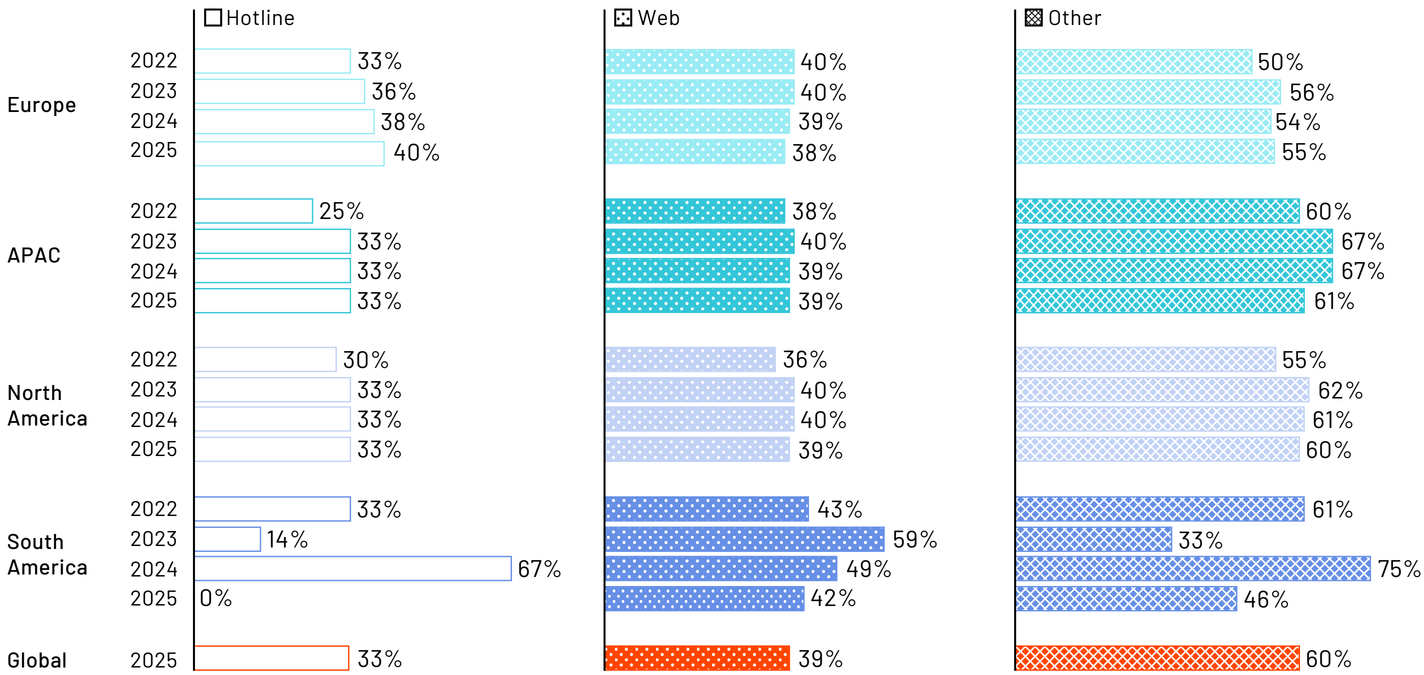
Frequency by report origination region



Report Intake Method by Substantiation Rate

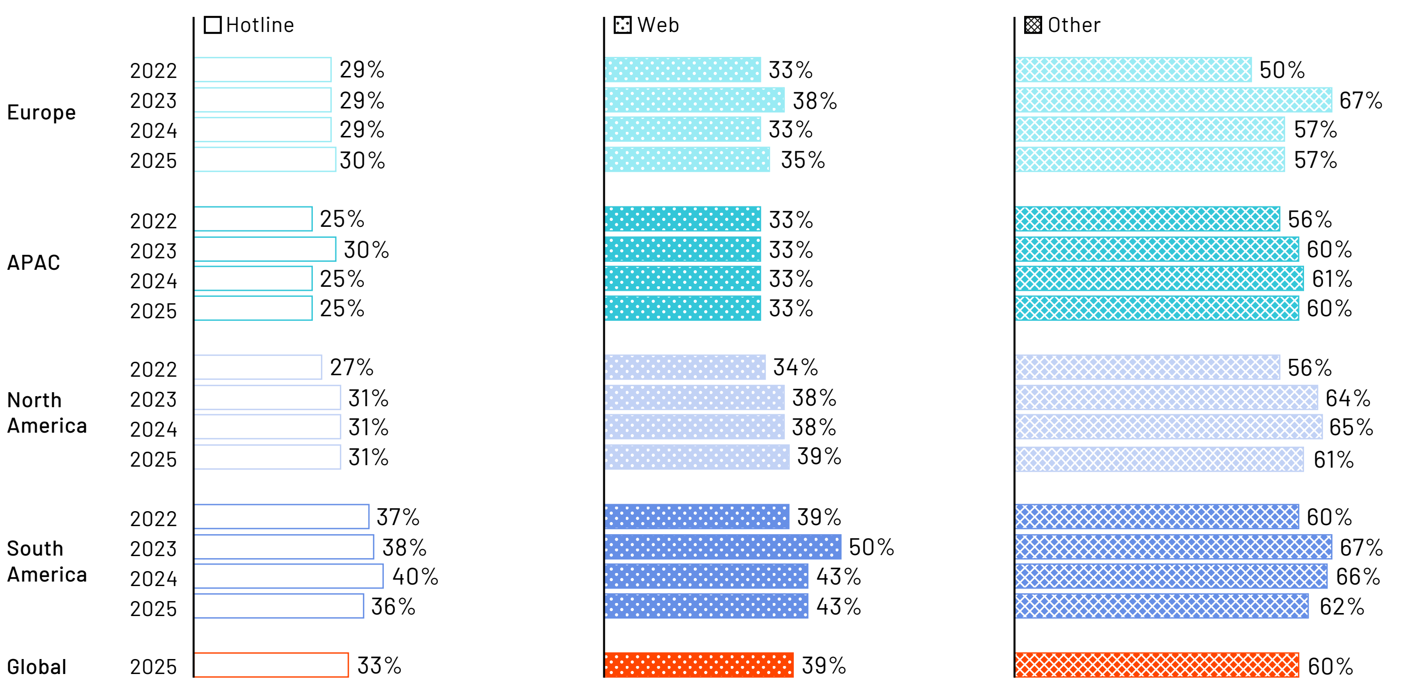
HQ REGION

REPORT INTAKE METHOD – SUBSTANTIATION RATE
Median reporting value (MRV) by headquarters region



REPORT ORIGINATION REGION

REPORT INTAKE METHOD – SUBSTANTIATION RATE
Median reporting value (MRV) by report origination region

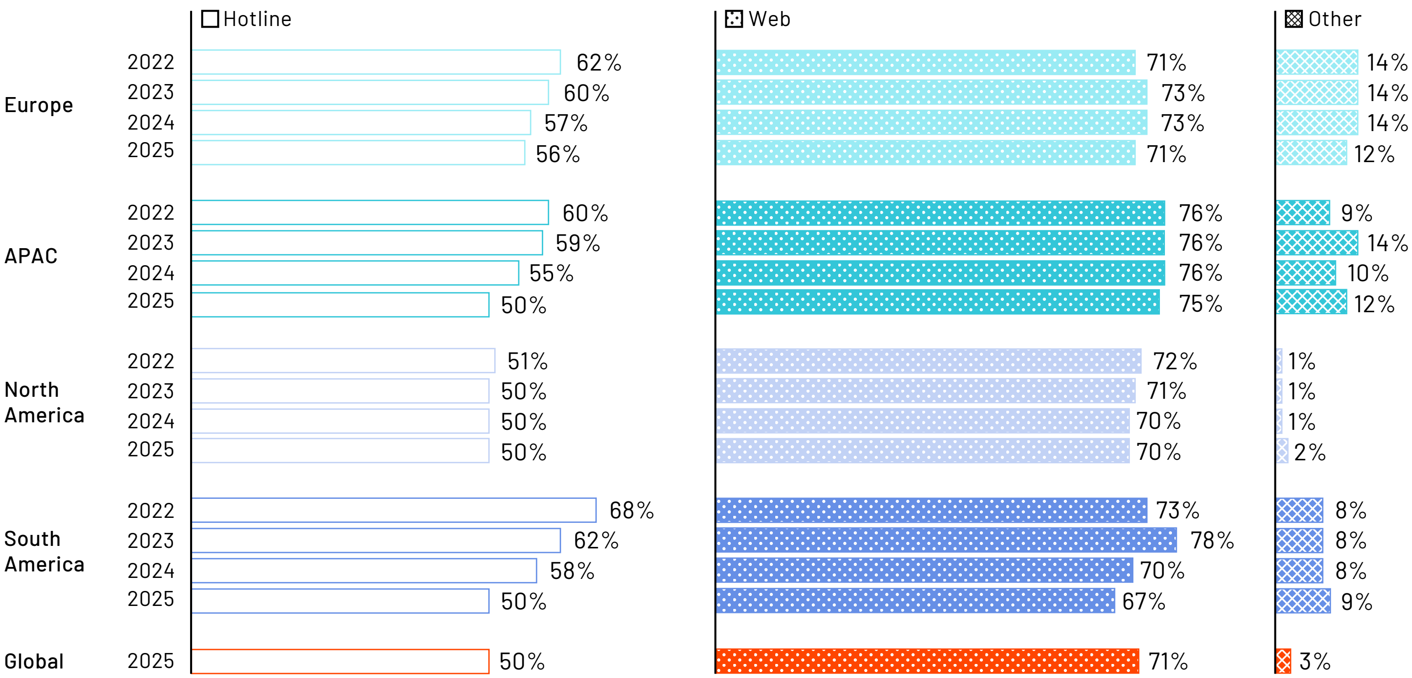


Report Intake Method by Anonymous Versus Named Reporting

HQ REGION

REPORT INTAKE METHOD BY ANONYMOUS VERSUS NAMED REPORTS

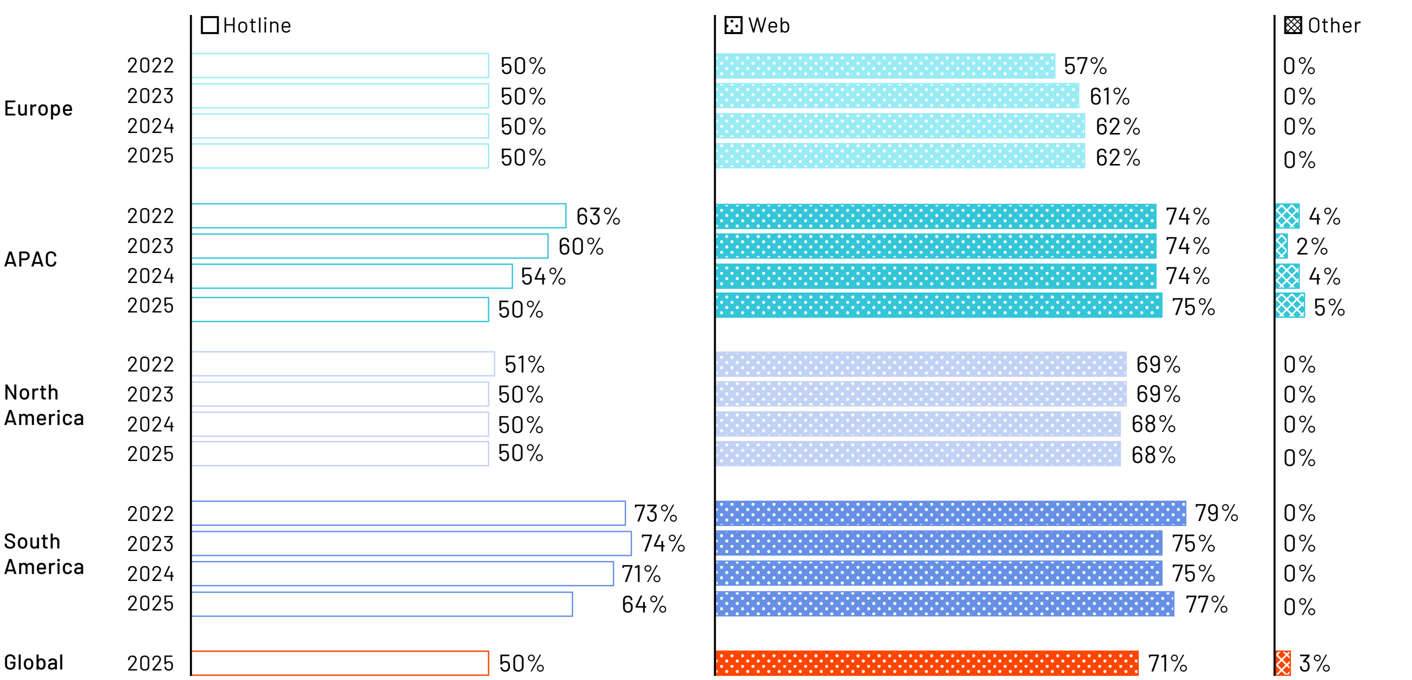
Median reporting value (MRV) by headquarters region



REPORT ORIGINATION REGION

REPORT INTAKE METHOD BY ANONYMOUS VERSUS NAMED REPORTS

Median reporting value (MRV) by report origination region



08 Report Outcomes

08 Report Outcomes

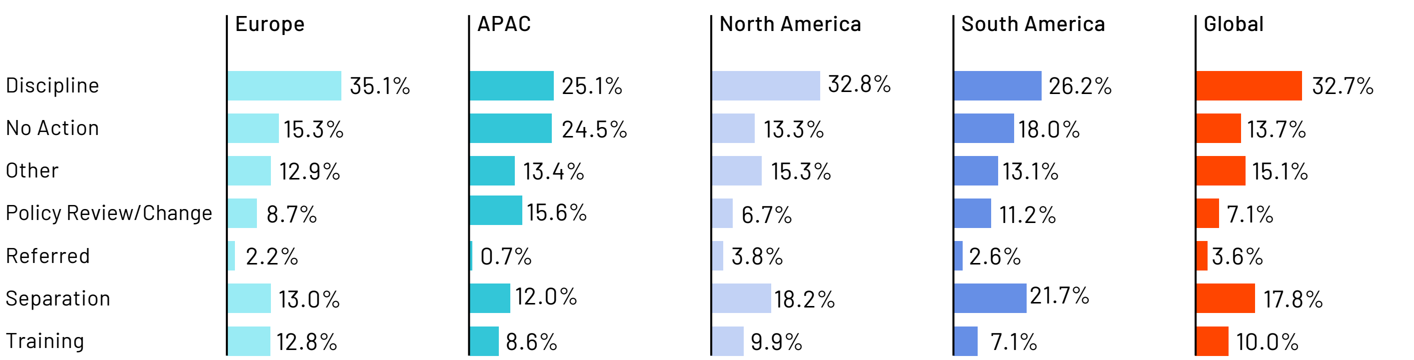
Report Outcomes by Substantiated Reports

How to calculate: Sort substantiated reports into one of the seven outcomes. Divide the number of reports into each of the outcomes by the total number of reports.

HQ REGION

REPORT OUTCOME FOR SUBSTANTIATED REPORTS

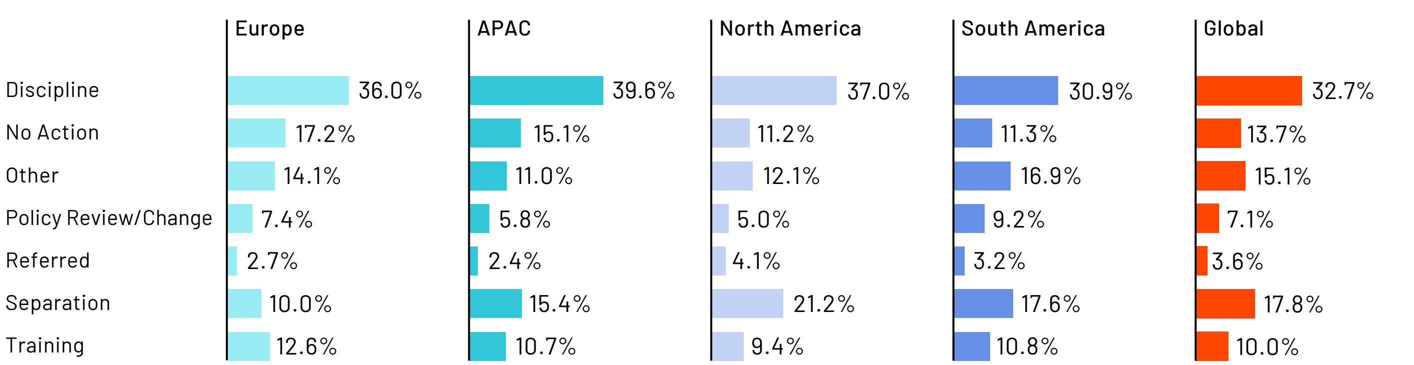
Frequency by headquarters region



REPORT ORIGINATION REGION

REPORT OUTCOME FOR SUBSTANTIATED REPORTS

Frequency by report origination region



09
Reporter Category

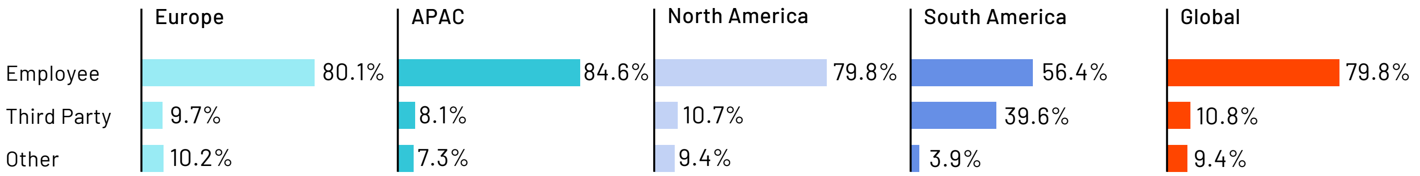
09 Reporter Category

Reporter Category – Frequency Comparison

How to calculate: For reports with an indicated reporter relationship, group reports by employee or third party. Group reports where the reporter either did not disclose their *Reporter Category*, or the category was unclear, as other.

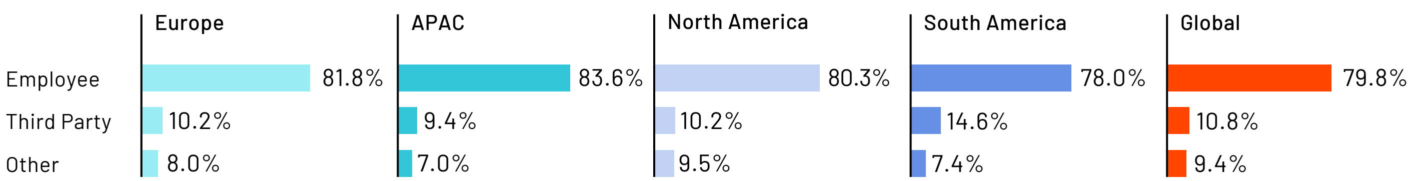
HQ REGION

REPORTER CATEGORY – FREQUENCY COMPARISON
Frequency by headquarters region



REPORT ORIGINATION REGION

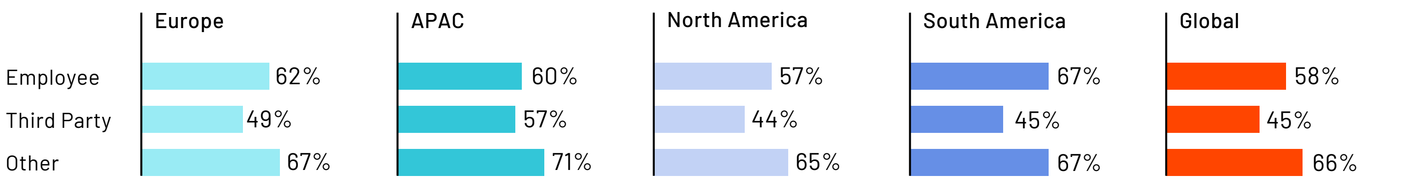
REPORTER CATEGORY – FREQUENCY COMPARISON
Frequency by report origination region



Reporter Category by Anonymous Reporting Rate

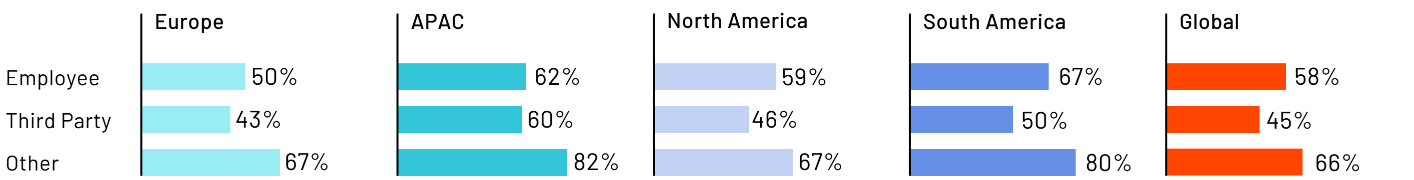
HQ REGION

REPORTER CATEGORY – ANONYMOUS REPORTING RATE
Median reporting value (MRV) by headquarters region



REPORT ORIGINATION REGION

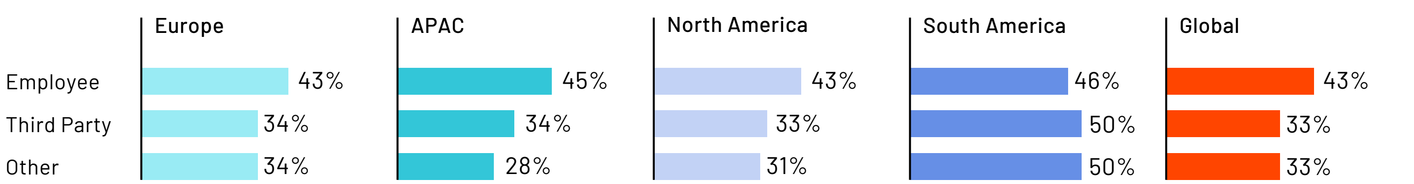
REPORTER CATEGORY – ANONYMOUS REPORTING RATE
Median reporting value (MRV) by report origination region



Reporter Category by Substantiation Rate

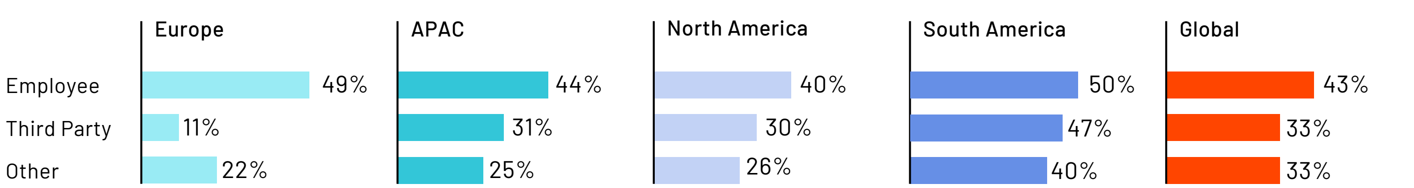
HQ REGION

REPORTER CATEGORY – SUBSTANTIATION RATE
Median reporting value (MRV) by headquarters region



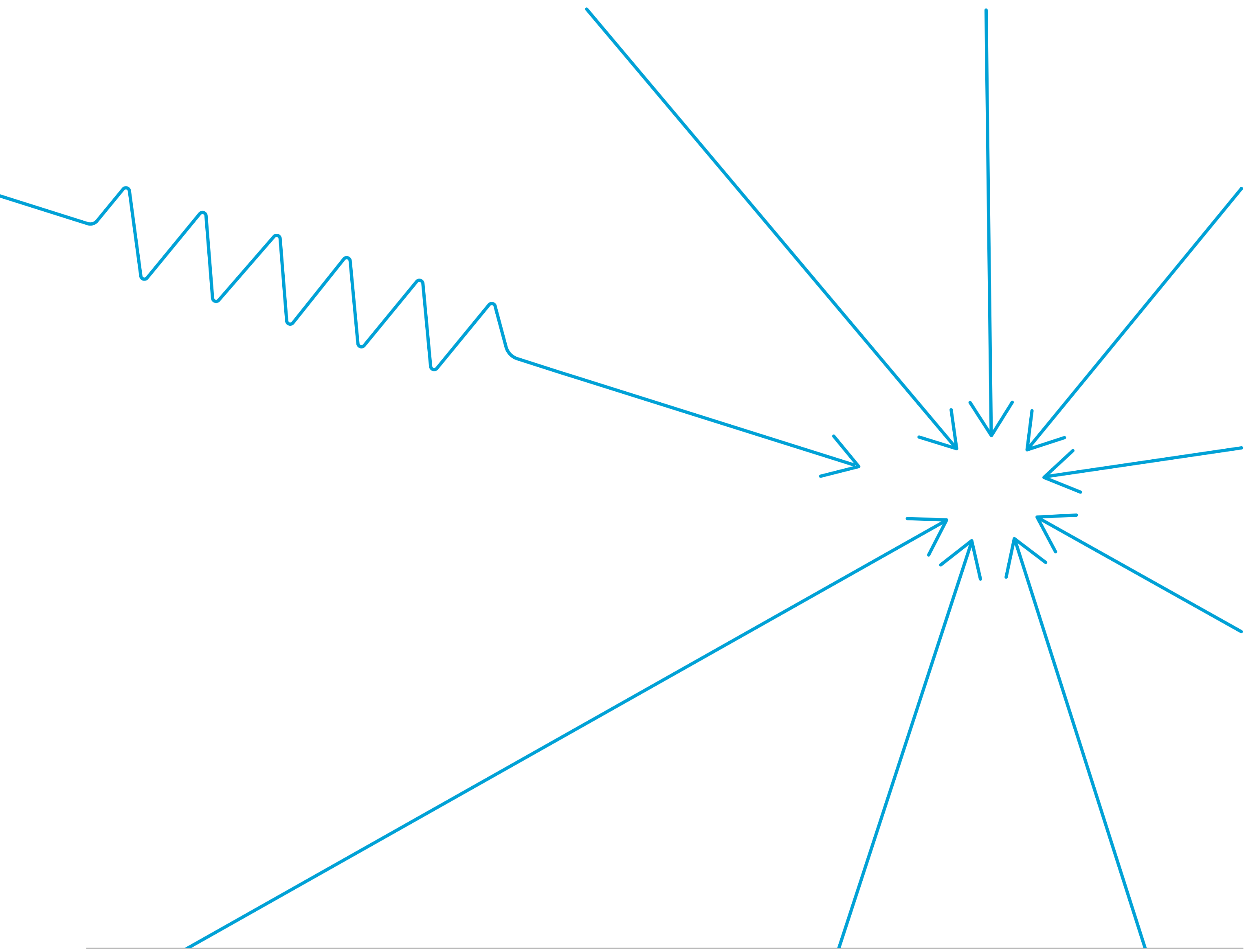
REPORT ORIGINATION REGION

REPORTER CATEGORY – SUBSTANTIATION RATE
Median reporting value (MRV) by report origination region



10 Appendix

10 Appendix: Guide to Risk Categories, Risk Types and Statistics



Workplace Conduct

Risk Type	Risk Type Definition
Harassment	Reports of harassment that are linked to a protected characteristic (such as race, gender, sex, religion, disability, age, etc.) and includes allegations of unwelcome behavior that is offensive to a reasonable person, and is related to, or done because of, a protected characteristic.
Discrimination	Reports of discrimination or concerns relating to accommodation requests. Discrimination generally occurs when there is a negative employment action impacting a term or condition of employment, that action is taken by the employer (which can include managers as well as others who have control over terms or conditions of work such as team leads), or the action was taken because of protected characteristic. A workplace accommodation involves a request to adjust something relating to work linked to either a religious practice/belief or a disability. This includes allegations or reports related to religious practices or beliefs or speaks to a workplace modification or leave request linked to a medical condition or disability.
Substance Abuse	Reports related to impairment resulting from use of substances (drugs/alcohol – legal or illegal) impacting the workplace or violating a policy – can be on or off-duty and on- or off-premises including at company events.
Compensation and Benefits	Reports related to matters of compensation, pay, insurance, time-off, retirement benefits, leaves of absence (paternity, maternity, other medical) and other common employee benefits. Examples could include incorrect paycheck or inaccurate recording of vacation/time-off/sick time.
Workplace Civility	Reports related to abusive or disrespectful behavior connected to work that are not harassment or discrimination.
Other Human Resources	Reports that cannot be categorized elsewhere and likely involve Human Resources. Examples include performance management, discipline, immigration, labor relations, grievances, job eliminations, arrests and convictions, and the sale or distribution of drugs.
Retaliation	Reports of Retaliation/reprisal of any kind against an employee including claims of any action taken to punish or dissuade an employee from making a report or participating in an investigation either internally or externally. Retaliation claims most often involve allegations against a manager, supervisor or some other person with control and power over the reporting person. However, Retaliation can also involve conduct by a coworker.

Business Integrity

Risk Type	Risk Type Definition
Conflicts of Interest	Reports about a conflict of interest, either a self-report or a report involving the behavior of others. A conflict of interest can arise in any situation where an employee's financial or personal interest could potentially or actually interfere, or even appear to interfere, with their business judgment or the interests of the organization.
Confidential and Proprietary Information	Reports related to confidential and proprietary information or intellectual property. Confidential information is any non-public information that is not intended or permitted to be shared beyond those with a genuine business need to know the information. Confidential information can include information about people or companies and specifically includes business plans, trade secret information, customer lists, sales and marketing strategies, pricing, product development plans, and any notes or documentation of the foregoing. Intellectual property refers to an original, intangible creation of human intellect that is legally protected from unauthorized use. Intellectual property includes patents, trademarks and copyrighted works of authorship, like photographs, music, literary works, graphic design, source code, and audio and audiovisual recordings.
Data Privacy and Protection	Reports related to the rights and responsibilities relating to data held or processed by an organization. This data can include data about employees, customers, consumers or others. Examples include allegations of data misuse, loss or theft of data, breaches or attempted breaches or requests by an individual relating to their own data.
Free and Fair Competition	Reports involving activities that undermine free and fair competition in the marketplace. These activities frequently involve any agreement with a competitor to fix prices or otherwise limit competition. Even the appearance of such agreement is problematic.
Bribery and Corruption	Reports of public or private instances of bribery. Bribery occurs when a person offers money or something else of value – to an official or someone in a position of power or influence – for the purpose of gaining influence over them. Corruption includes dishonest or illegal behavior – especially of people in authority – using their power to do dishonest or illegal things in return for money or to get an advantage over someone else.

Business Integrity continued

Risk Type	Risk Type Definition
Insider Trading	Reports that a person is buying or selling any company's (employer's or any other company's) securities/stock based on non-public information as well as passing (tipping) this information on to someone else who then buys or sells stock.
Global Trade	Reports related to the import and export of goods and services globally. It can include imports (bringing goods or services into a country) or exports (sending goods or services – including software – from one country to another). This category also includes reports relating to sanctions/trade sanctions (people or countries) which make it unlawful to do business with sanctioned people or countries.
Political Activity	Reports of improper use of employer resources (time, assets, brand, etc.) for political activity (by an individual or an organization) such as using work time for political activities, pressuring colleagues to give money or time to a political action committee (PAC) or associating organization name with a political candidate/official/group. It can also include misuse of company funds for political activities, using company resources to create or distribute political messages and violations of lobbying regulations and restrictions.
Human Rights	Reports related to human rights which generally refer to the basic rights and freedoms of individuals. Examples include reports relating to human trafficking or modern-day slavery that involve the use of force, fraud or coercion to obtain labor or sex for money, drugs or other goods.
Product Quality and Safety	Reports about quality and safety issues related to products. Examples include allegations that a product is not safe for intended use, is putting others at risk of harm or that it fails to meet industry standards.
Other Business Integrity	Reports related to business integrity that cannot be categorized elsewhere. Examples include industry-specific policies, regulations or laws.

Accounting, Auditing and Financial Reporting

Risk Type	Risk Type Definition
Accounting, Auditing and Financial Reporting	Reports related to accounting, financial reporting or auditing. Examples include the unethical or improper recording and analysis of the business and financial transactions associated with generally accepted accounting practices. Examples include misstatement of revenues, misstatement of expenses, misstatement of assets, misapplications of GAAP principles, and wrongful transactions.

Misuse or Misappropriation of Assets

Risk Type	Risk Type Definition
Misuse or Misappropriation of Assets	Reports that the organization's assets are being wasted, inappropriately used, abused, or not properly protected. This category can include a wide array of assets such as property, tools, money/credit cards, facilities, company vehicles, employee time and even abuse of employer provided benefits.

Environment, Health and Safety

Risk Type	Risk Type Definition
Imminent Threat to a Person, Animals or Property	Reports of imminent or immediate threat of harm to a person or people, animals or property. Reports may or may not involve a weapon and generally are the kind of incident where authorities (such as police or fire) are called to assist.
Environmental	Reports about impact to the environment. This could include intentional, negligent or accidental acts or omissions that harm the environment or violate policy, regulatory or legal requirements. It can also include acts or omissions that otherwise present a risk to the climate. Examples can include such things as spills, mismanaged wastewater or resources, release of harmful materials or substances into the atmosphere or improper disposal of hazardous waste.
Health and Safety	Reports about workplace safety. This can include employee safety and facilities or equipment. Each employee is responsible for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. Reports about concerns such as a threat of assault or violence (not including an imminent threat). Reports about physical security in a facility.

Other

Risk Type	Risk Type Definition
Other	Reports that do not fit any of the other categories listed.

Let's talk statistics: distributions, assumptions and their implications

Throughout this report we reference a number of statistical terms when discussing calculation methodologies.

What is a distribution?

A distribution is a set of numbers considered as a whole.

Defining average: mean vs. median vs. mode

There are three primary calculations when considering what is "average" for a set of numbers:

- **Mean**: the sum of all values divided by the number of values summed
- **Median**: the number at the exact middle point of a sorted distribution
- **Mode**: the most repeated value in a distribution. Mode is not used for any of the statistics presented in this report.

This report primarily presents medians because it mitigates the influence of extremely high and low values in the distribution, called outliers. To illustrate the impact of outliers, we can consider the following two distributions:

DISTRIBUTION A: {1, 2, 3, 4, 5}

DISTRIBUTION B: {1, 2, 3, 4, 490}

If you take the mean of Distribution A, you will get 3. If you take the mean of Distribution B, you will get 100. In both of cases, the median is 3. That median value is much closer to the values of 1, 2, 3 and 4 than the mean.

We consider both median and mean values for select metrics. Doing so allows our readers to both ensure they are comparing against the correct metric for their internally calculated statistics and affords insight into how skewed the distributions of those metrics are.

Skewed distributions

A distribution is said to be skewed when the values are not evenly spread in both directions from the median. A skewed distribution can make it more challenging to analyze the data in the distribution. In fact, out of the three calculations of what is "average" in a distribution, the mean is most affected by a skewed distribution.

If there are some values above the median that are comparatively high, that distribution is said to be skewed high and the mean will be higher than the median. The converse is true when you have a distribution which is skewed low.

A classic example of distribution which is skewed high is income in the United States; as of 2021, the mean income was $97,962, while the median was $69,717. This gap in median and mean income calculations is due to a relatively small number of very high incomes.

Examples and implications of altering a distribution

Let's consider the following distribution:

{1, 2, 3, 5, 6, 8, 9, 12, 17}

We can see that the median is the highlighted figure 6 and calculate the mean as (63 / 9) = 7. This implies that the distribution is skewed high, which makes sense when considering the values 12 and 17 in relation to the rest of the distribution.

Now let's trim the top and bottom values, leaving us with this distribution:

{2, 3, 5, 6, 8, 9, 12}

The median does not change, however when we calculate the mean, we get ~6.42, lower than the value calculated on the distribution before trimming off the top and bottom values. Methods like this are used to reduce the influence of very high and very low values on the calculation of means while leaving the median unchanged.

There are times when using rules to remove values from a distribution can have unintended consequences for calculated statistics. Let's consider a situation where we have a rule to exclude values of 0 and 1 when calculating statistics and this distribution:

{0.1, 0.2, 0.3, 0.4, 0.5, 0.6, 0.7, 0.8, 0.9}

With the distribution as it stands, this has no impact on median or mean, both of which are 0.5. Now let's say that a situation arises which decreases the values in the distribution to this:

{0, 0, 0, 0.3, 0.4, 0.5, 0.6, 0.7, 0.8}

If we take the median and mean of this distribution excluding the zero values, we get a mean and median of 0.55, higher than the calculations on the original distribution with overall higher values. Taking the zeros into account, the median comes out to 0.4 and the mean to ~0.367, much more reflective of the new situation.

Hopefully, this appendix has illustrated the need for careful consideration and research of a distribution, and a solid fundamental understanding of what statistic is needed when asking questions about compliance or any other data.

- There are three ways to consider what is average in a distribution: mean, median and mode.
- Skewed distributions affect means much more than medians.
- Making changes to a distribution will almost always change calculated statistics.

About the authors

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As one of the earliest ethics officers in the industry, Carrie Penman has been with NAVEX since 2003 after serving four years as deputy director of the Ethics and Compliance Officer Association (ECOA), now ECI. A scientist by training, she developed and directed the first corporate-wide global ethics program at Westinghouse Electric Corporation from 1994-1999.

As chief risk and compliance officer for NAVEX, Carrie leads the company's formal risk management processes. She also oversees its internal ethics and compliance activities employing many of the best practices that NAVEX recommends to its customers.

Carrie has extensive client-facing risk and compliance consulting experience, including more than 15 years as an advisor to boards and executive teams; most recently as NAVEX's SVP of Advisory Services. She has also served as a corporate monitor and independent consultant for companies with government settlement agreements.

Carrie was awarded the inaugural Lifetime Achievement Award for Excellence in Compliance 2020 by Compliance Week magazine. In 2017, Carrie 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.

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As senior content marketing manager for NAVEX, Eric supports the creation of various thought leadership publications on behalf of the organization's subject-matter experts. A one-time reporter, he previously led the content team behind a national portfolio of cybersecurity conferences.

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Isabella started working at NAVEX in 2021 as a data analyst. She obtained her M.S. in applied data science from University of San Diego, and has a background in psychology, sales and customer service analytics. She uses her skills and focus on data ethics to improve business practices and customer experiences.

Anders Olson

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Anders transitioned from a career in banking to join NAVEX in 2020 as the company's inaugural data scientist. Since then, he has been instrumental in enhancing the data ecosystem, leveraging his expertise in applied economics to analyze and improve compliance-related human behavior data.

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