



Welcome to the Ethisphere Ethics Quotient™ 2010 rating, conducted by the Ethisphere Institute in partnership with Ethisphere Magazine. In order to participate in this survey, you must be an authorized representative of an organization with an annual revenue of at least \$50 million (or local currency equivalent) or an employee base of at least 100 people.

This questionnaire consists of a mix of multiple choice (both single- and multiple-select) and open ended text questions that should take approximately 30-40 minutes to complete.

Your participation is voluntary. Ethisphere will use the information provided through this questionnaire in conjunction with other inputs and research to assess your organization's ethical score. You may skip any question if you so desire, but please remember that our analysis is dependent upon the information you provide.

Organizations with higher scores will be designated as the World's Most Ethical Companies. The winners will be announced at our annual World's Most Ethical Companies Gala in 2010. Additionally, the list of winners will be published by the Ethisphere Magazine and may be syndicated through its media partners, which include Fortune, Dow Jones and Financial Times.

We ask you to complete the questionnaire by **January 1, 2010**. If you have any questions or experience technical difficulty, please contact Christopher Sindik at csindik@ethisphere.org.

Additional documents can be mailed to:
Christopher Sindik
Ethisphere
1133 Broadway, Suite 708
New York, NY 10010

Thank you for contributing your time to this worthy project.

Part 1. Respondent Demographics

1. Please provide your name, business title and contact information

Your name:

Business title:

Email address:

Phone number:

(Please include country code if located outside the U.S.)

- a. If your company completed last year's questionnaire, we are able to use your previous responses for this year's World's Most Ethical Companies questionnaire. Would you like to use your answers from 2008 as this year's submission?

- YES
 NO

- b. The Ethisphere Institute is also in the process of collecting data for the Government Contract Ratings. Many of the questions in this survey also appear in the Government Contractor Survey. The Government Contractor Rankings will produce a Government Contractor Ethics Quotient in a number of areas in which excellence is recognized. Ethisphere presents awards to Government Contractors in several categories, such as Best Overall Ethics Program, Best Private Companies, Best Small Companies, Best Foreign Companies, Best Codes of Conduct, etc. A comprehensive overview of the rankings can be found [here](#).

Would you like to save time by having your answers from this survey also apply to the Government Contractor Questionnaire?

- YES
 NO

2. Do you, as the respondent, currently reside in the European Union? (Note: EU residents will be given a consent statement in compliance with EU privacy laws)

- YES
 NO

If you answered 'NO,' please go to question 4. If you answered 'YES,' please read the consent statement below

3. Consent statement

Your participation in this study is optional. Your responses and personal information will be gathered, analyzed, used and protected in accordance with applicable data privacy laws and Ethisphere's Data Privacy Policy. Ethisphere will process all responses and your personal information in the United States.

Please select "YES" to begin the survey or "NO" if you do NOT want to proceed with the survey.

- YES
 NO

If you answered 'NO,' please exit the survey. If you answered 'YES,' please continue with the survey

4. Please provide your organization's full name:

5. Please indicate the type of your organization (Select one):

- Public company
 Private company
 Educational or research institution
 Other (specify)

6. Please select your primary industry (Please select only **one** that most closely describes your primary activities):

- Aerospace and defense
 Agriculture, forestry, fishing and hunting
 Banking
 Business services
 Chemicals
 Computer software
 Computer hardware
 Computer services
 Construction
 Consumer products manufacturing
 Consumer
 Education
 Electronics
 Energy, oil and gas
 Environmental services, equipment and remediation
 Financial services
 Food and beverage products manufacturing

- Food service
- Healthcare products
- Healthcare services
- Industrial manufacturing
- Insurance
- Leisure and hospitality
- Media
- Metals and mining
- Non-profit
- Pharmaceuticals and biotechnology
- Professional, scientific and technical services
- Real estate
- Retail
- Security products and services
- Telecommunication equipment
- Telecommunication services
- Transportation and logistics
- Utilities
- Wholesale trade
- Other (specify)

7. Please indicate the total size of your organization's workforce (Select one):

- 100-249 employees
- 250-499 employees
- 500-999 employees
- 1,000-9,999 employees
- 10,000-24,999 employees
- 25,000-49,999 employees
- 50,000-99,000 employees
- 100,000-149,999 employees
- Over 150,000 employees

8. Please indicate the amount of your annual revenue (if publicly available) (Select one):

- \$5-20 million
- \$20-50 million
- \$50-100 million
- \$100-200 million
- \$200-500 million
- \$500 million- \$1 billion
- \$1-2 billion
- \$2-5 billion
- \$5-10 billion
- over \$10 billion

Part 2. Corporate Citizenship and Responsibility

9. Does your organization publish periodic Corporate Citizenship, Responsibility or Sustainability reports on its performance?

YES
 NO

Please answer the following question only if you checked 'YES' above. Otherwise, please skip the next question and go to question 11

10. Is this report(s) available on your organization's website?

YES
 NO (please email a copy to csindik@ethisphere.org)

11. Please describe your organization's projects and initiatives that benefit society at large and/or the local communities where your organization operates. (Note: Please limit your response to 1,000 words; if this topic is covered by a published report, please enter "See the report")

12. Please describe your organization's projects and initiatives aimed towards workforce sustainability and wellbeing (Note: Please limit your response to 500 words; if this topic is covered by a published report, please enter "See the report")

13. Please describe your organization's performance in the area of environmental protection, climate change and sustainability. (Note: Please limit your response

to 1,000 words; if this topic is covered by a published report, please enter "See the report")

14. Please describe your organization's projects and initiatives aimed towards ethics in the supply chain. (Note: Please limit your response to 1,000 words; if this topic is covered by a published report, please enter "See the report")

15. Please provide a number for your organization's total annual philanthropic contributions in 2007 or 2008 as a percentage of your organization's net income:

Part 3. Corporate Governance

16. Does your organization get rated by the following governance rating agencies? (Please select all that apply and provide applicable scores if available; if unsure, please skip this question)

- ISS/Risk Metrics: CGQ Index Rating_____CGQ Industry Rating
- GMI: Global Rating_____Home Rating
- Corporate Library: Score_____
- Other (please indicate):_____ Score_____

Part 4. Innovation

17. Please describe your organization's key product or service innovations that positively contribute to public wellbeing. (Note: Please limit your response to 1000 words; if this topic is covered by a published report, please enter "See the report")

Part 5. Industry leadership

18. Please provide examples of your organization's leadership of industry or corporate discourse on issues of business ethics, compliance, governance, social responsibility, sustainability and environment; please highlight any relevant setting of standards or public policy work. *(Note: Please limit your response to 1000 words; if this topic is covered by a published report, please enter "See the report")*

Part 6. Executive leadership

19. Please specify the job title(s) of the person given primary responsibility for the ethics program/initiatives:

20. To whom does the person with responsibility for the ethics program/initiatives report? (Please indicate **primary** reporting relationship)

- President/CEO
- General Counsel
- CFO
- Head of Internal Audit
- Board of Directors of a Committee
- Other (specify)

21. How often does the person with responsibility for the ethics program communicate with the Board of Directors or other Committee?

Quarterly

Annually

Other (specify)

22. Please indicate your level of agreement with the following statement:

"The person with responsibility for the ethics program has been given adequate authority and resources to perform the job effectively"

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

Not sure

23. Please indicate your level of agreement with the following statement:

"The Board of Directors is actively engaged in the organization's ethics program"

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

Not sure

24. Please indicate your level of agreement with the following statement:

"The organization's senior executives regularly and consistently communicate with employees regarding the proper standards of conduct, ethics and compliance"

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

Not sure

If you strongly agreed or agreed with this statement, please answer the next question. Otherwise, please skip the next question and go to question 29

25. Please provide examples of executive communication to the workforce emphasizing the importance of ethics. (Note: Please limit your response to 250 words)

26. Please indicate your level of agreement with the following statement:

“The organization’s senior executives set personal examples and reinforce ethical behavior at workplace, and are personally involved in many of our corporate ethics and citizenship initiatives”

- Strongly agree
 Agree
 Neutral
 Disagree
 Strongly disagree
 Not sure

If you strongly agreed or agreed with this statement, please answer the next question. Otherwise, please skip the next question and go to question 28

27. Please provide examples of your organization’s executive management (including the CEO) setting personal examples and reinforcing ethical behavior in the workplace, as well as other executive personal involvement in your organization’s ethics and citizenship initiatives. *(Note: Please limit your response to 250 words)*

Part 7. Internal Systems: Ethics Program

28. Does your organization maintain an organization-wide written Code of Ethics and Business Conduct?

- YES

NO

If you answered 'NO,' please skip the next question and go to question 30

29. Is it available on your organization's Internet and/or intranet site? (Select one)

- YES, both Internet and Intranet sites
- YES, but on the Internet site only
- YES, but on the intranet site only (please email a copy to csindik@ethisphere.org and indicate "[your company name] code" in the subject line)
- NO (please email a copy to csindik@ethisphere.org and indicate "[your company name] code" in the subject line)

30. Does your organization maintain policies that address the following issues? (Select all that apply)

- Antitrust/competition
- Fair dealing (fair business practices)
- Conflicts of Interest
- Gifts, entertainment and kickbacks
- Political contributions, activities and lobbying
- Bribery and corruption
- Data privacy (employees, customers and/or consumers)
- Insider trading
- Equal employment opportunity, discrimination and harassment
- Environmental protection
- Workplace health and safety

31. Does your organization require periodic conflict of interest certifications/disclosure from certain employees?

- YES
- NO

If you answered 'NO,' please skip the next question and go to question 33

32. The following employee segments have been subject to conflict of interest certification/disclosure in the past 24 months (Please select all that apply):

- Executive level
- Vice Presidents
- Directors
- Managers
- All or most employees in sales function
- All or most employees in procurement function
- All or most employees in finance function
- Other (specify – 200 words)

33. Does your organization routinely conduct exit interviews as people leave?

- YES
 NO

34. Does your organization use proactive, workforce-oriented mechanisms to make sure the company is living its values (e.g., challenge meetings, town-hall meetings)?

- YES
 NO

35. Does your organization maintain a misconduct reporting system (whistleblower system)?

- YES
 NO

If you answered 'NO,' please skip the next 2 questions and go to question 38

36. The reporting mechanism permits the following (Select all that apply):

- Report potential or actual criminal misconduct
 Report potential or actual violations of organizational policy(s)
 Seek guidance regarding ethics and compliance issues
 Express concerns
 Other (specify – 50 words)

37. Please specify the type of reporting options available (Select all that apply):

- Phone number
 Website
 Email
 "Open door"
 Other (specify – 50 words)

38. How does your organization handle reports of alleged misconduct?

- Conduct internal investigations of all reports of alleged misconduct
- Conduct internal investigations of those reports that seem credible
- Other (specify – 50 words)

39. Does your organization maintain a clear process for escalating certain types of allegations to senior management, the Board of Directors (or a Committee thereof) or external auditors?

- YES
- NO

40. What kind of misconduct information is reported to the Board or a Committee? (Select all that apply)

- Overall misconduct reporting statistics in periodic (e.g., quarterly) reports
- Details of all key investigations after they have been completed
- Details of all key investigations in progress
- OTHER (specify – 50 words)

41. Does your organization maintain a non-retaliation policy for a good faith misconduct reporting?

- YES
- NO

If you answered 'NO,' please skip the next question and go to question 43

42. Please indicate your level of agreement with the following statement:

"Our organization's non-retaliation policy has been clearly communicated to all employees"

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Not sure

43. Does your organization maintain a written policy and procedures on disciplinary actions?

- YES
- NO

If you answered 'NO,' please skip the next question and go to question 48

44. Please indicate your level of agreement with the following statement:

"The policy and procedures on disciplinary action (for engaging in misconduct) is consistently applied/enforced throughout the organization"

- Strongly agree
 Agree
 Neutral
 Disagree
 Strongly disagree
 Not sure

45. Does your organization offer any of the following incentives for employees for engaging in ethical conduct? (Please select all that apply)

- Evaluation of ethical business conduct as a part of annual performance reviews
 Evaluation of ethical business conduct as a part of promotion decisions
 Awards and recognitions showcasing ethical business conduct
 Other (specify – 50 words)

46. What mechanisms does your organization use to ensure supplier compliance with ethical and legal standards? (Select all that apply)

- Our organization maintains a written Supplier Code of ethics and business conduct
 Supplier acknowledgement and compliance with the Supplier Code is a required condition of doing business with the organization
 Our organization's hotline and other reporting mechanisms are available for supplier personnel to use
 Our organization encourages or requires suppliers to maintain a reporting hotline or other reporting mechanism
 Our organization conducts due diligence when selecting suppliers
 Our organization conducts periodic supplier audits to ensure compliance
 Suppliers are encouraged or required to obtain a third-party certification for ethics and compliance
 Our organization provides suppliers with ethics and compliance training assistance or resources

47. How would you rate the level of oversight of your suppliers?

- High
 Above average

- Average (neither high nor low)
 Below average
 Low

48. Does your organization have a program aimed at compliance with anticorruption and anti-bribery laws (such as the FCPA)?

- YES
 NO
 NOT APPLICABLE (clarify – 50 words)

49. Does your organization conduct due diligence for third-party representatives (e.g., agents, distributors, joint venture partners)?

- YES
 NO
 SOME, BUT NOT ALL (specify – 50 words)

50. Within the past 24 months, has your organization conducted a risk assessment to determine compliance, regulatory and ethics related risks?

- YES
 NO

51. Within the past 24 months, has your organization conducted a formal evaluation or benchmarking of your overall compliance and ethics program/initiative to evaluate its relative effectiveness?

- YES
 NO

If you answered 'NO,' please skip the next question and go to question 53

52. Which components of the compliance and ethics program has your organization evaluated within the past 24 months? (Select all that apply)

- Code of Ethics and Business Conduct
 Policies, procedures and controls
 Training and communication
 Organizational health and culture of ethics
 Employee knowledge of ethics and compliance issues relevant to their jobs
 Whistleblowing system
 Auditing system

- High-level oversight
 Other (specify – 50 words)

53. Does your organization maintain a formal training plan for ethics training?

- YES
 NO

54. How would you rate the average level of awareness of the Code of Ethics and Business Conduct (or ethical principles) among employees in your organization?

- High
 Better than average
 Average (neither high nor low)
 Below average
 Low

55. Does your organization offer a dedicated training program on the organization's Code of Ethics and Business Conduct for employees?

- YES
 NO

If you answered 'NO,' please skip the next 2 questions and go to question 58

56. Please describe briefly the current audience and frequency for Code of Ethics and Business Conduct training as well as an approximate percentage of your total global workforce that receive this training. *(Note: Please limit your response to 500 words)*

57. Is the Code of Ethics and Business Conduct training mandatory?

- YES, for all employees
 YES, for some, but not all employees (please specify the mandatory groups of employees – 50 words)
 NO

58. Has the Board of Directors been trained on your organization's Code of Ethics and Business Conduct?

- YES
 NO

59. Does your organization offer other ethics and compliance related targeted training to select groups of employees in addition to training on the Code of Ethics and Business Conduct? (e.g., targeted training on workplace harassment, antitrust, privacy)

- YES
 NO

If you answered 'NO,' please skip the next question and go to question 61

60. Please briefly describe your organization's ethics and compliance related training in addition to Code of Ethics and Business Conduct training. (Note: Please limit your response to 500 words)

61. Does your organization routinely offer ethics-related training for third-party representatives, such as agents and business partners?

- YES
 NO

62. Does your organization routinely communicate with employees about ethics and compliance training topics outside of formal training programs?

- YES
 NO

If you answered 'NO,' please skip the next question and go to question 64

63. Please briefly describe your organization's ethics and compliance communication initiatives outside of formal training programs. (Note: Please limit your response to 500 words)

Part 8. Integrity track record and reputation

64. Based on publicly available information, how would you rate your organization's overall record of integrity, business ethics, legal and regulatory compliance in the past five years?

- Superior (better than most organizations)
- Average
- Inferior (worse than most organizations)
- Not sure/Decline to answer

65. How would you rate your organization's overall reputation with customers, suppliers, media and the general public?

- Superior (better than most organizations)
- Average
- Inferior (worse than most organizations)
- Not sure/Decline to answer

66. How would you describe your organization's internal culture of ethics?

- Very strong
- Strong
- Fair
- Weak
- Very weak

67. Please list all awards and recognitions received by your organization in the past five years. *(Note: Please limit your response to 1,000 words; if this information is listed on your website, please provide a link)*



68. Would you like to provide any additional information relating to your organization's ethical practices, governance, compliance program, citizenship or leadership that you have not provided elsewhere? *(Note: Please limit your response to 1,000 words)*



Thank You for Completing the Survey

You may provide us with additional documents and materials to support your responses and our analysis, unless these documents are freely available on your website. Examples of such documents include:

- Your organization's Code of Ethics and Business Conduct
- Examples of employee ethics communication materials
- Employee handbook
- Supplier Code of Ethics
- Summary of current compliance training curriculum
- Copies of key policies
- Summary results of employee culture surveys
- Compliance and ethics reports to the Board of Directors or a Committee

You can email these materials to Christopher Sindik at csindik@ethisphere.org or mail them to:

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