

2020 Ethics Quotient Survey

World's Most Ethical Companies®

Application

Section 1: Introduction & Consent Form

Thank you for participating in the Ethisphere® Institute's 2020 Ethics Quotient® (EQ) Survey ("Survey") and World's Most Ethical Companies® (WME) evaluation process!

How to Complete Your 2020 World's Most Ethical Companies Application

Participation in the WME evaluation process consists of three steps. First, candidates complete this Survey. Second, candidates submit documentation to allow Ethisphere to further evaluate certain elements of their submissions. Ethisphere's review and evaluation of a candidate's program and initiatives through review of the provided supplemental documentation is a crucial component of the evaluation process. Third, candidates submit a WME application fee. For more information on these steps, please visit the links provided below:

Information on the types of documents to submit and how to organize and submit them can be found at <https://www.worldsmoethicalcompanies.com/wp-content/uploads/comprehensive-documentation-guidelines.pdf>

Information on how to submit your WME application fee can be found at <https://ethisphere.com/ethics-quotient-processing-fee/>

Information on the WME selection process and assessment methodology can be found at <https://www.worldsmoethicalcompanies.com>

1.1. Survey Completion Instructions

This Survey should be completed by one or more authorized individuals with a working knowledge of the company's programs and initiatives in the areas of ethics and compliance, corporate governance, and corporate citizenship and responsibility.

Please answer all questions to the best of your ability. When considering possible responses, select the answer choice that best reflects the current state of your company's program. Because each company is unique and the WME process considers multiple types of companies throughout the world, we recognize that some questions may not apply to your particular company. If there are certain questions for which you feel the answer options do not reflect your company's program, please include a written summary within your supporting documentation.

You received a personalized link to the Survey earlier via email. This URL serves as your company's unique identifier. You may stop and exit at any time during the survey process and resume your progress by following the link again. You may go back and edit any response.

To avoid duplicating or overwriting information, it is strongly suggested that the online Survey be completed by a single individual at your company. Once the Survey is submitted, no further edits may be made.

If you have any questions or experience technical difficulty, please email wmeapplications@ethisphere.com.

1.2. Terms and Conditions

Types of Eligible Companies

Except as explained below, any company—public or private, for-profit or not-for-profit, regardless of where they are headquartered—is eligible to participate in the EQ process and to be considered for designation as a World's Most Ethical Company. However, as Ethisphere's process evolved, Ethisphere concluded that it cannot sufficiently evaluate non-profit colleges and universities, governments, governmental agencies, and NGOs. Therefore, organizations in these categories will not be considered for the World's Most Ethical Company designation.

We encourage wide participation in the evaluation process, regardless of whether a company thinks that it will be honored as one of the World's Most Ethical Companies. All companies that respond to the Survey will receive an analysis that provides their overall Ethics Quotient score and explains how their overall responses in each of the five categories and their answers to key questions within each category compare to companies named as honorees. The value in participating is not only in learning how your company compares to the honorees, but also in better understanding best practices and trends in leading companies.

Privacy and Confidentiality

In the process of completing the EQ Survey and providing supporting documentation and explanations, a World's Most Ethical Companies nominee will supply Ethisphere with confidential and proprietary information. Ethisphere will take reasonable steps to maintain the confidentiality of this information. Ethisphere will only use the confidential information submitted to process the nominee's submission (including generating scores) to provide a scorecard and other analysis to the nominee, to determine whether the nominee will be designated a WMEC honoree, for any additional analysis or discussion the company may wish to have with Ethisphere, and in an aggregated and anonymized fashion for benchmarking or other comparative or analytical purposes. Any confidential information will be anonymized and will not be able to be connected to the participant.

EQ scores for identified individual companies are not made public. Any confidential information contained in supplemental documentation submitted in support of the company's nomination will be destroyed within two years after its submission. Any method of conveying such stored information, such as portable hard drives, will not be returned to the nominee but will be destroyed. Names of companies that apply for the WME designation are not released and remain confidential, except for the names of those actually selected as World's Most Ethical

Companies.

If the nominee submits any personal information about its employees or others in completing the EQ survey or otherwise participating in the WME selection process, Ethisphere will only use this information to process or follow up on the nominee's submission, including to contact the nominee regarding the WME process or any related topics, or to discuss or provide Ethisphere services, events, or products.

1.3. No Legal Advice and Limitation of Liability

In participating in the WME review process, the nominee agrees that evaluation, benchmarking, scoring, and guidance provided by Ethisphere constitute information that may be useful to the nominee as part of its independent business considerations. The information and content are not intended to provide and should not and cannot be considered as legal advice or legal opinion. The information and content serve only as broad recommendations for the nominee's efforts in prioritizing possible areas of risk and the development and focus of compliance and ethics program efforts. Ethisphere makes no guarantees or warranties as to any person's or entity's legal compliance or program and, therefore, explicitly disclaims and does not represent that following any or all of the recommendations made in connection with the WME review process services will substantially reduce a company's operational or legal risk of a material violation of the law.

Each nominee, therefore, assumes sole responsibility for any and all action it takes based upon the evaluation and other information provided by Ethisphere as part of the WME process. Any reliance upon the evaluation and other information provided is at nominee's sole risk. Accordingly, each nominee agrees that Ethisphere shall not be liable for any damages resulting from use of or reliance upon the evaluation or other information provided by Ethisphere or any other information derived from such information.

1.4. 2020 WME Logo

By participating in the WME selection process, nominee understands and agrees that if it should be selected for Ethisphere's 2020 World's Most Ethical Companies list, it must follow Ethisphere's published Branding and Logo Usage Guidelines when using text to announce and publicize the honor. Consistent with this, nominees also understand and agree that any use of Ethisphere's 2020 WME logo or the term "World's Most Ethical Companies" will be governed by Ethisphere's Branding and Logo Use Guidelines and related terms and license fees. Honorees may not design their own logos or depart from the Branding and Logo Use Guidelines.

1.5 Data Privacy Consent Statement

Your participation in this survey is optional. Your company's responses and any personal information will be gathered, analyzed, used, and protected in accordance with the confidentiality provisions provided in the Introduction section. Select "Yes" if you consent to

such collection and use of your personal information and to begin the survey or “No” if you do not wish to proceed with the survey.

Yes

No

Skip To: End of Survey If 1.5 = No

End of Section 1: Introduction & Consent Form

Section 2: Organizational Profile

Q2.1 Please provide the name of the company for which you are completing this survey.

Complete and formal company name

If different than above, please provide your company name as you wish it to be publicized if selected as one of the 2020 World's Most Ethical Companies

Q2.2 Please provide the contact information for the individual responsible for completing the survey and who should be contacted with questions regarding the application.

First name: _____

Last name: _____

Title or role: _____

Email address: _____

Phone (with country code): _____

Q2.3 If desired, provide the contact information for any other individual within your organization who should receive communications regarding your company's application, including application updates, honoree determination decisions, and events and media associated with the World's Most Ethical Companies designation.

First name: _____

Last name: _____

Title or role: _____

Email address: _____

Phone (with country code): _____

Q2.4 Please provide contact information for the individual responsible for public relations or media communications for your company who can serve as a point of contact for Ethisphere should your company be included on the World's Most Ethical Companies list.

- First name: _____
- Last name: _____
- Title or role: _____
- Email address: _____
- Phone (with country code): _____

Q2.5 Please select which type of organization you represent.

- Public company
- Private company
- Non-profit or not-for-profit organization
- Other (Please specify) _____

Q2.6 Please select your company's primary industry.

If your company has operations across multiple industries, please select a secondary and, if necessary, a tertiary industry. Please rank industries by revenue (i.e., primary industry is the largest revenue component of your organization, secondary is the second largest revenue source).

At least one answer is required for your "Primary Industry" column, while answers in the "Secondary Industry" and "Tertiary Industry" are optional.

	Primary Industry	Secondary Industry	Tertiary Industry
Aerospace & Defense	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Automotive & Transportation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Biotechnology	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Business Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chemicals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Computers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Construction & Real Estate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Consumer Products & Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Education	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Electronics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Energy (Oil & Gas, Renewables)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Food, Beverage & Agriculture	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health Care (Managed Care Provider)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health Care (Facilities)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information Technology	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Primary Industry	Secondary Industry	Tertiary Industry
Insurance (Health Insurance)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Insurance (Non-Health Insurance)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lodging, Leisure & Recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Manufacturing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Media, Music, Publishing & Broadcasting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Medical Devices	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Minerals & Mining	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pharmaceuticals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Retail	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Security	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Telecommunications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Utilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wholesale/Distribution	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q2.7 Please indicate the country in which your company is headquartered.

▼ Afghanistan ... Zimbabwe

Note to applicant - Question 2.7 presents a drop-down list of every available country.

Q2.8 Please select the total size of your company's workforce.

- Less than 1,000 employees
- 1,000 - 9,999 employees
- 10,000 - 24,999 employees
- 25,000 - 49,999 employees
- 50,000 - 100,000 employees
- Over 100,000 employees

Q2.9 Please select your organization's total annual revenue in U.S. dollars.

- Less than \$500,000,000
 - \$500,000,001 - \$1,000,000,000
 - \$1,000,000,001 - \$5,000,000,000
 - \$5,000,000,001 - \$10,000,000,000
 - \$10,000,000,000 - \$25,000,000,000
 - \$25,000,000,000 - \$50,000,000,000
 - \$50,000,000,000 - \$75,000,000,000
 - Greater than \$75,000,000,000
-

Q2.10 Please select the approximate percentage of your workforce population that is represented (e.g., unionized, members of work councils, etc.).

- 0 percent
- 1-10 percent
- 11-20 percent
- 21-30 percent
- 31-40 percent
- 41-50 percent
- 51-70 percent
- 71-90 percent
- 91-100 percent

End of Section 2: Organizational Profile

Section 3: Corporate Governance

This section examines the availability and quality of systems designed to ensure strong corporate governance including oversight, governance principles, and risk management. When evaluating a company's corporate governance, company-specific factors such as ownership structure are taken into consideration.

Q3.1 What type of governing authority does your company have in place?

Please note that any reference to “other governing authority” throughout this questionnaire applies ONLY to companies that do not have a Board. Also, for purposes of this survey, the term “director(s)” refers to member(s) of your company’s governing authority, if different than a Board.

- Board of Directors
 - Board of Trustees or Governors
 - Board of Advisors
 - Supervisory Board
 - Partnership/Owners/Members or similar (and no other formal governing authority)
 - My company does not have a governing authority
-

*Display Question 3.2:
If Q3.1 = My company does not have a governing authority*

Q3.2 You indicated that your company does not have a governing authority. Please describe your company’s structure and what processes or practices exist to provide oversight of management or to oversee the company’s ethics and compliance function.

Please limit your response to 500 characters.

Skip To: End of Section 3 If Q3.2 Is Displayed

Q3.3 How many directors sit on your Board or governing authority?

Display Question 3.4:

*If Q2.5 = Public company
Or Q2.5 = Private company
Or Q2.5 = Non-profit or not-for-profit organization
Or Q2.5 = Other (Please specify)*

And If

*Q3.1 = Board of Directors
Or Q3.1 = Board of Trustees or Governors
Or Q3.1 = Board of Advisors
Or Q3.1 = Supervisory Board*

Q3.4 How many directors on your company's Board are **independent**?

"Independent" means that the director has no material relationship with the company other than as a director. Examples of an independent director include non-executives, directors who have no financial relationship with the company other than fees paid for Board service, directors who have no familial relationships with executives, or independent auditors.

Q3.5 How many directors on your company's Board or governing authority are **women**?

Q3.6 How many directors on your company's Board or governing authority are **non-employee directors**?

A "non-employee director" is one that is not currently an employee of the company, its parent, or any subsidiary, such as the Chief Executive Officer.

Display Question 3.7:

If Q2.5 = Public company

Q3.7 Which of the following best reflects your current Board leadership? Please select all that apply.

- The CEO and Chair roles are held by different individuals
 - The Chair is an independent director
 - There is a lead director, and individual serving as the lead director is independent
 - None of the above
-

*Display Question 3.8:
If Response to Question 3.6 Is Greater Than 0*

Q3.8 How many non-employee directors have experience in your company's industry outside of sitting on your or another company's Board of Directors?

*Display Question 3.9:
If Response to Question 3.6 Is Greater Than 0*

Q3.9 Does any non-employee director on your Board have ethics and compliance program expertise? Note that for this question ethics and compliance program expertise does not include tangential involvement with an ethics and compliance program (e.g., serving as a CEO or a member of an audit committee), but actual involvement in the operation of an ethics and compliance program (e.g., serving as a chief ethics and compliance officer).

Yes (Please describe the expertise held by relevant Board members)

No

*Display Question 3.10:
If Response to Question 3.6 Is Greater Than 0*

Q3.10 Does any non-employee director on your Board have sustainability and/or corporate social responsibility-related expertise? Note that for this question sustainability and/or corporate social responsibility-related expertise does not include tangential involvement in sustainability and/or corporate social responsibility efforts such as service on a non-profit board, but actual involvement in sustainability and/or corporate social responsibility efforts.

Yes (Please describe the expertise held by relevant Board members)

No

Our company does not have any non-employee directors

Q3.11 Is the chair of your audit committee (or equivalent) a financial expert (as defined in section 407 of the Sarbanes-Oxley Act of 2002)?

Yes

No

*Display Question 3.12:
If Q2.5 = Public company*

Q3.12 Describe the election process for members of your company's Board.

- All directors are elected annually
 - A percentage of directors are elected each year (also known as a staggered Board)
 - Our company uses a different election process (Please specify)
-

Display Question 3.13:

If Q2.5 = Public company

Q3.13 Can long-term shareholders submit their own independent director candidates for consideration on the company's proxy card (commonly known as "proxy access")? Please select all that apply.

- Yes, a group of shareholders owning more than three percent of company shares for some specified length of time can nominate independent directors, whose names will appear on company proxy ballots
 - Yes, a group of shareholders owning more than five percent of company shares for some specified length of time can nominate independent directors, whose names will appear on company proxy ballots
 - Yes, but the group of shareholders aggregating their shares to satisfy the ownership percentage requirement may not consist of more than ten shareholders
 - Yes, but the group of shareholders aggregating their shares to satisfy the ownership percentage requirement may not consist of more than 20 shareholders
 - No, shareholders wishing to nominate their own directors may not access the company's ballot
-

Q3.14 Does your company provide a version of its Code of Conduct to the Board or other governing authority? Please select all that apply.

- The Board or other governing authority receives our company's Code of Conduct
- The Board or other governing authority receives a version of the Code of Conduct specific to the conduct of the Board or governing authority (i.e., a Board Code of Conduct)
- Our company does not provide a Code of Conduct to the Board

Q3.15 In the past two years, has your company's Board or other governing authority received formal training on either the company's Code of Conduct or a Board-specific version of the Code of Conduct? Note that having the Board review and/or approve the Code does not count as training on the Code.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing the training received by the Board or other governing authority on the Code of Conduct by the Board.

- Yes, the entire Board is provided the same Code of Conduct training given to company employees
- Yes, the entire Board is provided a version of Code of Conduct training developed specifically for the Board
- Yes, directors sitting on the committee with oversight of the ethics and compliance program receive the same Code of Conduct training as employees while all other directors receive Code training developed specifically for the Board
- No, directors do not receive Code of Conduct training

Q3.16 Indicate which topics directors on your company's Board or governing authority receive education or training on (separate from Code training) and when they receive said training or education.

Please note that this training need not be delivered by the ethics and compliance function but does need to be required (not just made available). Also, training refers to the information being presented and explained to the audience; a handout or written materials provided for review does not constitute training.

The context of this question is to understand training delivered for two reasons: (i) to understand a topic or risk sufficiently to perform the Board's or governing authority's oversight role and (ii) to educate directors on company policies regarding risks applicable to the directors. Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide samples of risk-specific ethics and compliance training materials used in training the Board or governing authority as indicated by your answers to 3.16.

	As part of onboarding or orientation	As part of compliance program updates	As part of documented training initiatives
Antitrust and competition law	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Anti-bribery or anti-corruption law	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Company's policies/procedures regarding protecting confidential information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Company's policies/procedures regarding conflicts of interest	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Executive compensation trends and developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fiduciary duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Company's policies/procedures regarding gifts and entertainment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Risks or regulations regarding information security/cyber security	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Company's policies/procedures regarding insider trading	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Privacy regulations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	As part of onboarding or orientation	As part of compliance program updates	As part of documented training initiatives
Trends and risks regarding the need to protect those who report suspected misconduct	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Trends and risks regarding social media	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Updates on industry or economic trends or risks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Updates on significant regulatory changes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other training topic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Display Question 3.17:

*If Q3.1 = Board of Directors
Or Q3.1 = Board of Trustees or Governors
Or Q3.1 = Board of Advisors
Or Q3.1 = Supervisory Board*

Q3.17 Which of the following practices, if any, does your company use to expose non-employee directors to the company's operations and risks? Please select all that apply.

- At least once a year, we vary the physical location of formal Board or governing authority meetings to locations other than our primary headquarters, including locations where our company has business functions, units, subsidiaries, and/or field operations
- As part of our onboarding process, we require non-employee directors to visit company locations other than our primary headquarters (this may include where our company has business functions, units, subsidiaries, and/or field operations)
- Separate from formal Board or governing authority meetings or onboarding, we require non-employee directors to periodically visit company locations other than our primary

headquarters (this may include where our company has business functions, units, subsidiaries, and/or field operations)

Separate from formal Board or governing authority meetings, we encourage or facilitate non-employee directors to visit company locations other than our primary headquarters (this may include where our company has business functions, units, subsidiaries, and/or field operations)

We encourage and facilitate non-employee directors to visit company locations other than our primary headquarters (this may include where our company has business functions, units, subsidiaries, and/or field operations) by providing them with keys, keycards, or access codes to physically access company locations other than our primary headquarters

We encourage and facilitate non-employee directors to visit company locations other than our primary headquarters (this may include where our company has business functions, units, subsidiaries, and/or field operations) by providing them with office space to use when visiting any company locations (this is separate from space provided to prepare for or attend formal Board or governing authority meetings)

We encourage or facilitate non-employee directors to visit key customers

We encourage or facilitate non-employee director attendance at industry conferences or trade shows

We do not have business function, units, subsidiaries, or field operations in any locations other than our primary headquarters

Our company does not have any non-employee directors

None of the above

Display Question 3.18:

If Q3.1 = Board of Directors

Or Q3.1 = Board of Trustees or Governors

Or Q3.1 = Board of Advisors

Or Q3.1 = Supervisory Board

Q3.18 Which of the following describes your company's Board attendance during the last two years?

- All directors attended at least 75 percent of Board and committee meetings for the period for which they served
- One director did not attend at least 75 percent of their Board and committee meetings for the period for which they served
- More than one director did not attend at least 75 percent of their Board and committee meetings for the period for which they served
- My organization does not track the attendance of directors

*Display Question 3.19:
If Q2.5 = Public company
And Question 3.6 Response Is Greater Than 0*

Q3.19 How often do non-employee directors meet with your company's various stakeholders?

	More frequently than once a year	Annually	As requested by stakeholder	Not permitted by policy	Do not know	Never	Not applicable
Institutional investors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Retail shareholders (or other active shareholders)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Market analysts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Priority organizational clients/customers or third parties (such as key suppliers or joint venture partners)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regulators	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Proxy advisor firms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Display Question 3.20:

*If Q3.1 = Board of Directors
Or Q3.1 = Board of Trustees or Governors
Or Q3.1 = Board of Advisors
Or Q3.1 = Supervisory Board*

Q3.20 How frequently does your company conduct performance evaluations of the Board, committees of the Board, and/or individual directors?

	Annually	Every two years	Every three years	Every four or more years	Ad hoc	We do not conduct evaluations
Full Board	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Committees of the Board	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Individual directors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q3.21 What tenure-limiting mechanisms, if any, does your company use to control which non-employee directors are on its Board? Please select all that apply.

- Age limits
- Term limits
- Limitations on the number of other Boards a member may serve on
- Directors must submit resignation if their employment or professional status changes
- Other (Please specify) _____
- Our company does not have any tenure limiting mechanisms

Display Question 3.22:

- If Q3.1 = Board of Directors*
- Or Q3.1 = Board of Trustees or Governors*
- Or Q3.1 = Board of Advisors*
- Or Q3.1 = Supervisory Board*

Q3.22 What is the average tenure, in years, of the directors on your company's Board or governing authority? Please round all figures to the nearest tenth (e.g., "4.2").

Display Question 3.23:

- If Q3.1 = Board of Directors*
- Or Q3.1 = Board of Trustees or Governors*
- Or Q3.1 = Board of Advisors*
- Or Q3.1 = Supervisory Board*

Q3.23 How many directors have been on your company's Board for more than 17 years?

- More than 30 percent
- 20-30 percent
- 10-20 percent
- Less than 10 percent
- None

Display Question 3.24:

If Response to Question 3.6 Is Greater Than 0

Q3.24 Does your company require conflict of interest certifications and/or disclosures (separate from a Code of Conduct acknowledgement) from non-employee directors?

- Yes
- No
- No, but we do require a certification to follow our Code of Conduct (or a Board-specific Code of Conduct), and the certification specifically includes language (in addition to any included in the Code of Conduct) regarding conflict of interest certifications and/or disclosures

Q3.25 Describe how your Board or governing authority allocates responsibility for oversight of the company's sustainability and/or corporate social responsibility-related activities.

- We have a dedicated sustainability/corporate social responsibility committee of the Board or governing authority
 - Oversight responsibilities are defined in the committee charter of a committee not dedicated to sustainability and/or corporate social responsibility related activities
 - Oversight responsibilities are allocated to the full Board or governing authority
 - Other (Please specify) _____
 - Our Board or governing authority does not oversee the company's sustainability and/or corporate social responsibility-related activities
-

Q3.26 How does your Board, a committee of the Board, or the governing authority oversee the organization's talent/human capital strategy? Please select all that apply.

- The Board, a committee of the Board, or the governing authority receives regular reports from the CEO about the leadership pipeline, bench strength, skills requirements based on future strategy, diversity and inclusion activities, etc.
- The Board, a committee of the Board, or the governing authority receives regular reports from the head of Human Resources (or equivalent) about the leadership pipeline, bench strength, skills requirements based on future strategy, diversity and inclusion activities, etc.
- The Board, a committee of the Board, or the governing authority receives regular reports from business unit and functional leaders about the leadership pipeline, bench strength, skills requirements based on future strategy, diversity and inclusion activities, etc.
- Other (Please specify) _____
- The Board or governing authority does not play a role in the oversight of talent/human capital strategy

Q3.27 How does your Board, committee of the Board, or the governing authority oversee the health of the organization's culture? Please select all that apply.

- The Board, a committee of the Board, or the governing authority receives regular reports from the CEO about the culture of the organization
- The Board, a committee of the Board, or the governing authority receives regular reports from the head of Human Resources about the culture of the organization
- The Board, a committee of the Board, or the governing authority receives regular reports from the owner of the ethics and compliance program about the culture of the organization
- The Board, a committee of the Board, or the governing authority receives regular reports from Internal Audit about the culture of the organization
- The Board a committee of the Board, or the governing authority receives regular reports from third parties about the culture of the organization
- Other (Please specify)

- The Board, a committee of the Board, or the governing authority or governing authority does not play a role in the oversight of the health of the organization's culture

Q3.28 How many C-suite level employees (i.e., the highest-ranking member of management, such as the CEO or President and his or her direct reports, excluding administrative staff) are in your company?

Q3.29 How many C-suite level employees (i.e., CEO or President and his or her direct reports, excluding administrative staff) in your company are **women**?

*Display Question 3.30:
If Q3.1 = Partnership/Owners/Members (and no other formal governing authority)*

Q3.30 Because your company does not have a Board, please describe the structure of your company's governing authority and any practices your company has to allow the authority to provide oversight of the management of your company.

Please limit your response to 500 characters.



Q3.31 Please provide any additional commentary pertaining to your company's governance program you believe supports your questionnaire answers.

Please limit your response to 500 characters.

End of Section 3: Corporate Governance

Section 4A: Program Structure, Oversight, Responsibility, and Resources

Q4A.1 Briefly describe how your ethics and compliance function is structured, including reporting hierarchy and access to the Board or other governing authority. Please limit your response to no more than 1,000 characters.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing the program structure as described.

Q4A.2 For the following questions in this section, if your company has separated ethics and regulatory compliance into two distinct programs, please select the answer choices that best reflect the operations of the ethics program.

Specify all job titles held by the person assigned overall ownership of the ethics and compliance program. Please select all that apply.

- Chief Compliance and/or Ethics Officer
- Chief Executive Officer
- Chief Human Resources Officer
- Chief Risk Officer
- General Counsel or Chief Legal Officer
- Compliance and/or Ethics Officer
- Head of Internal Audit
- Privacy or Chief Privacy Officer
- Other (Please specify)

There is no person assigned overall responsibility for the ethics and compliance program

Q4A.3 What percentage of his or her time does the person assigned overall responsibility for the ethics and compliance program dedicate to that role?

- 0-50 percent
- 51-75 percent
- 76-90 percent
- 91-100 percent

Display Question 4A.4:

*If Q4A.2 = General Counsel or Chief Legal Officer
Or Q4A.2 = Chief Executive Officer
Or Q4A.3 = 0-50 percent
Or Q4A.3 = 51-75 percent*

Q4A.4 Given the person assigned overall responsibility for the ethics and compliance program is also the CEO or General Counsel, and/or dedicates less than 76 percent of their time to the ethics and compliance role, is there a person in addition to the person with overall authority who is assigned day-to-day operational responsibility for the ethics and compliance program?

- Yes
- No

Display Question 4A.5:

If Q4A.4 = Yes

Q4A.5 Is the person who is assigned day-to-day operational responsibility for the ethics and compliance program generally present when updates regarding the ethics and compliance program are made to the Board, Board committee, or other governing authority?

- Yes
- No

Q4A.6 To whom does the person with overall responsibility for the ethics and compliance program administratively report? Please note that this does not include reporting on the ethics and compliance program to the Board or a committee of the Board, but rather who is managing the person's employment.

Supporting Documentation Request: if available, as part of your supporting application

materials, please provide documentation evidencing the reporting relationship indicated by your answer.

- Only the Board of Directors, a committee of the Board, or other governing authority
- Only the Chairperson of the Board committee directly overseeing the ethics and compliance function (if not also the Chief Executive Officer or President)
- Chairperson of the Board (if not also the Chief Executive Officer or President)
- Chief Executive Officer and/or President
- General Counsel or Chief Legal Officer
- Chief Financial Officer
- Chief Administrative Officer
- Chief Risk Officer
- Person in Legal Department other than the General Counsel or Chief Legal Officer (or the equivalent head of the Legal Department)
- Other (Please specify) _____

Q4A.7 Is there a documented policy or process requiring that the Board, a committee of the Board, or other governing authority be notified or approve before the person who has been assigned overall responsibility for the ethics and compliance program is terminated?

- Yes, notification is required before termination
- Yes, notification and approval are required before termination
- No, termination may occur without Board notification

Q4A.8 Does the entire Board and/or the Board committee **with oversight of the ethics and compliance function** provide input as to the **performance review** for the person assigned overall responsibility for the ethics and compliance program?

- Yes (Please describe how input is provided)

- No

Q4A.9 Does the entire Board and/or the Board committee **with oversight of the ethics and compliance function** provide input as to the **compensation** for the person assigned overall responsibility for the ethics and compliance program?

Yes (Please describe how input is provided)

No

Q4A.10 Is your company's ethics and compliance function centralized, decentralized, or combined?

For the purposes of this question:

A "centralized" function refers to a function where the majority of ethics and compliance staff are located at headquarters.

A "decentralized" function refers to multiple disparate ethics and compliance functions that are housed within business units operating independently.

A "combined" function refers to multiple, disparate ethics and compliance functions that are located within business units but whose staff administratively reports into an ethics and compliance function at headquarters.

Centralized

Decentralized

Combined

Q4A.11 Identify which of the following authorities, if any, are granted to the ethics and compliance function. Please select all that apply.

Note that for this question, answers containing the term "significant input/role" refer to the ability to influence decisions and voice concerns with the corresponding function before decisions are made.

Ability to author and/or recommend new business conduct policies

Ability to revise the Code of Conduct (with Board approval if required)

Primary budget responsibility for all ethics and compliance programs

Primary hiring authority for all positions in the ethics and compliance function

- Input on hiring/firing decisions regarding positions of authority which may affect ethics and compliance functions (e.g., Audit, Finance, HR)
 - Significant input/role in the process for organizational strategic business development decisions such as mergers and acquisitions, new market entry, expansion, business partnerships/alliances, and joint ventures
 - Significant input/role in product or services decisions such as product or services development, launch, or discontinuation
 - Significant input/role coordinating with relevant business functions (e.g., procurement) to ensure ethics and compliance risks/interests are included in product/supplier sourcing decisions
-

Q4A.12 Select the types of interactions the ethics and compliance function has with other functional groups in your company. Please select all that apply.

- Invited/allowed to design audits and receive audit results
- Invited/allowed to attend HR training events
- Invited/allowed to add ethics and/or compliance questions to employee surveys
- Invited/allowed to design technology solutions that support the ethics and compliance program
- Invited/allowed time in sales/marketing meetings (excluding ethics or compliance training) to educate on the relevance of the ethics and compliance program as a competitive advantage
- Invited/allowed to provide formal input on corporate business strategy
- Invited/asked to sit on a steering committee

Q4A.13 Does your company have employees located within various business regions or business units who formally serve as ethics and compliance points of contact for compliance related needs, such as receiving reports of misconduct?

For clarification, these employees may have other primary responsibilities, but their job description includes serving as an ethics and compliance point of contact or regional liaison.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing the structure and scope of the program responsible for managing these remote points of contact.

- Yes
- No
- Not applicable, as our company does not conduct business in multiple regions or does not maintain multiple business units

*Display Question 4A.14:
If Q4A.13 = Yes*

Q4A.14 What tools are used to communicate and/or collaborate with the employees described in Q4A.13 (i.e., those who support the ethics and compliance program located within various business regions or business units)? Please select all that apply.

- Email
- Spreadsheets, text documents, or PowerPoint files
- SharePoint or equivalent site to share documentation
- Internal website/portal
- Collaboration software tool
- Ethics and compliance or GRC-specific software tool or platform (Please specify which tool or platform is used) _____
- Other (Please specify) _____

Display Question 4A.15:

*If Q3.1 does NOT equal "My company does not have a governing authority"
And Q4A.2 does NOT equal "There is no person assigned overall responsibility for the ethics and compliance program"*

Q4A.15 How often does the person with overall responsibility for the ethics and compliance program conduct scheduled presentations regarding the program to the entire Board or other

governing authority (note that this would be separate from presentations to the committee overseeing the ethics and compliance program)?

- The person with ownership of the ethics and compliance program does not conduct scheduled presentations to the entire Board; rather, the chair of the committee overseeing the ethics and compliance program updates the board about presentations to the committee
- Regularly scheduled, at least quarterly
- Regularly scheduled, three times per year
- Regularly scheduled, twice per year
- Regularly scheduled, annually
- Ad hoc only, as needed
- Never

Display Question 4A.16:

If Q3.1 does NOT equal "My company does not have a governing authority"

And Q4A.2 does NOT equal "There is no person assigned overall responsibility for the ethics and compliance program"

Q4A.16 How often does the person with overall responsibility for the ethics and compliance program conduct scheduled presentations regarding that program to the committee of the Board or other governing authority with oversight of the ethics and compliance function?

- Regularly scheduled, more often than quarterly
- Regularly scheduled, quarterly
- Regularly scheduled, three times per year
- Regularly scheduled, twice per year
- Regularly scheduled, annually
- Ad hoc only, as needed
- Never

Q4A.17 Does the person with overall responsibility for the ethics and compliance program have regularly scheduled meetings in person or telephonically with the individual chairing the committee tasked with oversight of the program? Please select all that apply.

- Yes, regularly scheduled prior to the committee meeting
- Yes, regularly scheduled at least monthly
- No
- Our organization does not have an oversight committee

4A.18 Indicate which information, if any, your company reports to the Board and/or Board committee or other governing authority. Please select all that apply.

Please note that this reporting can be by any function, not just the owner of the ethics and compliance function. The term “details” as mentioned in the answer options refers to specific information for each investigation and resolution, not general data regarding all investigations and resolutions.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing reports made to the full Board or committee of the Board.

- Hotline and misconduct reporting statistics
- Details on ALL misconduct investigations and resolutions
- Details on SOME misconduct investigations and resolutions
- Ethics and compliance training initiatives
- Ethics and compliance communication initiatives
- Ethics and compliance program audit results
- Ethics and compliance program assessment or benchmarking findings
- Ethics and compliance risk assessment findings
- Ethics and compliance risk mitigation strategy and tactics

- Privacy risk assessment and results
- Initiatives and updates relating to the company's plan to ensure the security of its information assets (hereafter referred to as the "Information Security Program")
- Culture of ethics assessment or survey findings
- Ethics and compliance trends, industry trends, and best practices updates
- Code of Conduct updates or revisions
- Other unique information is reported to the Board and/or Board committee
(Please specify) _____

Display Question 4A.19:

*If Q3.1 = Board of Directors
Or Q3.1 = Board of Trustees or Governors
Or Q3.1 = Board of Advisors
Or Q3.1 = Supervisory Board*

And If

*Q2.5 = Public company
Or Q2.5 = Private company
Or Q2.5 = Non-profit or not-for-profit organization
Or Q2.5 = Other (Please specify)*

Q4A.19 How often does the person with overall responsibility for the ethics and compliance program normally meet in closed or executive session without management present to discuss the ethics and compliance program with the Board, a Board committee, or other governing authority present? If this occurs with varying frequency, please select the most frequent scenario.

- Regularly scheduled, more often than quarterly
- Regularly scheduled, quarterly
- Regularly scheduled, three times per year
- Regularly scheduled, twice per year
- Regularly scheduled, annually
- Ad hoc only, as needed
- Never

Q4A.20 How often does the person with overall responsibility for the ethics and compliance program normally communicate with your company's outside financial auditors regarding the ethics and compliance program without management present? If this occurs with varying frequency, please select the most frequent scenario.

- Regularly scheduled, more often than quarterly
- Regularly scheduled, quarterly
- Regularly scheduled, three times per year
- Regularly scheduled, twice per year
- Regularly scheduled, annually
- Ad hoc only, as needed
- Never

Q4A.21 Does your company have a steering committee dedicated to ethics and compliance?

For the purposes of this question, a steering committee is a committee that provides guidance as to the operation of the ethics and compliance program for the company as a whole.

- Yes
- No

Skip To: Q4A.25 If Q4A.21 = No

Q4A.22 You indicated that your company maintains a steering committee dedicated to ethics and compliance.

How often does this steering committee meet?

- Regularly scheduled, at least quarterly
- Regularly scheduled, three times per year
- Regularly scheduled, two times per year
- Regularly scheduled, annually
- Ad hoc only, as needed

Q4A.23 You indicated that your company maintains a steering committee dedicated to ethics and compliance.

Which of the following applies to the steering committee? Please select all that apply.

- C-suite executive(s) sit on the committee
- Executives or managers (excluding C-suite executives) sit on the committee
- Cross-functional committee (i.e., includes employees in functions other than ethics and compliance)
- Consists only of employees in ethics and compliance function
- Committee has a charter or written guidelines
- None of the above

Q4A.24 You indicated that your company maintains a steering committee dedicated to ethics and compliance.

Indicate which topics are regularly discussed during the steering committee meetings. Please select all that apply.

- Overall program performance
- Key program initiatives
- Hotline and reporting statistics
- Misconduct investigations and resolutions
- Ethics and compliance training and communication initiatives
- Ethics and compliance program assessment
- Ethics and compliance program benchmarking against practices of other companies
- Ethics and compliance risk management
- Metrics related to the performance of relevant company programs (e.g., clicks on



policies on company intranet, etc.)

- Culture of ethics
 - Significant regulatory and legal updates
 - Industry trends and best practices updates
 - Other topics (Please specify)
-

Q4A.25 What is the approximate number of full-time employee ("FTE") equivalents dedicated to ethics and compliance function/activities throughout your company?

Q4A.26 Please indicate the type of background(s) individuals in the ethics and compliance function possess. Please select all that apply.

- Attorney
- Paralegal (or other legal experience)
- Auditor/CFP
- Information Technology
- Data Analytics
- Employee Communications/Writer/Editor
- Finance
- Human Resources
- Operations
- Investigations
- Commercial

Other (Please specify)

Q4A.27 What are the approximate annual costs (in US dollars) incurred by ethics and compliance-related activities within your company? Please exclude any spending incurred on outside counsel.

- Less than \$50,000
- \$50,000 - \$149,999
- \$150,000 - \$249,999
- \$250,000 - \$499,999
- \$500,000 - \$999,999
- \$1,000,000 - \$4,999,999
- \$5,000,000 - \$9,999,999
- Greater than \$10,000,000

End Section 4A: Program Structure, Oversight, Responsibility, and Resources

Section 4B: Due Care

Q4B.1 Select the following that describes your company's efforts to ensure that employees in leadership positions (or "positions of trust") have not engaged in illegal activities or other misconduct. Please select all that apply.

Please note that for this and the following questions regarding background checks, the term "background check(s)" refers to research conducted by third parties. Except where specifically referenced, these checks do not include those against debarment or exclusion lists.

- Our company conducts background checks on all employees upon hire (where not prohibited by law or collective bargaining/union/works council agreements)
- Our company does not conduct background checks on any employees
- Our company conducts background checks on employees in certain job functions or at certain seniority levels upon hire (where permitted by law)
- Our company conducts checks on all employees against debarment or exclusion lists upon hire
- None of the above

Display Question 4B.1:

If Q4B.1 = Our company conducts background checks on some employees in certain job functions or at certain seniority levels upon hire (where permitted by law)

Q4B.2 Indicate which business functions require a background check. Please select all that apply.

- Personnel within the ethics or compliance function(s)
- Personnel within the Human Resources function
- Personnel within the Finance and/or Accounting function
- Executive-level personnel in the Sales or Business Development function
- Key personnel within the Procurement function
- Personnel within the Internal Audit function

- Personnel within the Information Technology function
- Personnel of certain seniority regardless of function
- None of the above

Display Question 4B.3:

*If Q4B.2 = Personnel within the ethics or compliance function(s)
Or Q4B.2 = Personnel within the Human Resources function
Or Q4B.2 = Personnel within the Finance and/or Accounting function
Or Q4B.2 = Executive-level personnel in the Sales or Business Development function
Or Q4B.2 = Key personnel within the Procurement function
Or Q4B.2 = Personnel within the Internal Audit function
Or Q4B.2 = Personnel within the Information Technology function
Or Q4B.2 = Personnel of certain seniority regardless of function
Or Q4B.1 = Our company conducts background checks on all employees upon hire (where permitted by law)*

Q4B.3 Does your company re-run background checks after hire? Please select all that apply.

- Upon promotion into certain business roles or positions
- Annually
- Every two to four years
- Every five or more years
- No

Display Question 4B.4:

*If Q4B.3 = Upon promotion into certain business roles or positions
Or Q4B.3 = Annually
Or Q4B.3 = Every two to four years
Or Q4B.3 = Every five or more years*

Q4B.4 Indicate which business functions require a re-run background check. Please select all that apply.

- Personnel within the ethics and compliance function(s)
 - Personnel within the Human Resources function
 - Personnel within the Finance and/or Accounting function
 - Executive-level personnel in the Sales or Business Development function
 - Key personnel within the Procurement function
 - Personnel within the Internal Audit function
 - Personnel within the Information Technology function
 - Personnel of certain seniority regardless of function
 - None of the above
-

Q4B.5 Does your company require conflict of interest certifications and/or disclosures (separate from a Code of Conduct acknowledgement) from employees?

Supporting Documentation Request: if available, as part of your supporting application

materials, please provide documentation evidencing the conflict of interest certification or disclosure.

- Yes, for all employees, where not prohibited by law or collective bargaining/union/works council agreements
- Yes, but only for employees at certain seniority levels or within certain business functions
- No, but we do require ALL employees to certify that they will follow our Code of Conduct and the certification specifically includes language (in addition to any included in the Code of Conduct) regarding disclosing or avoiding conflicts of interest
- No, but we do require SOME employees to certify that they will follow our Code of Conduct and the certification specifically includes language (in addition to any included in the Code of Conduct) regarding disclosing or avoiding conflicts of interest
- No, we do not require such certifications or disclosures

Display Question 4B.6:

If Q4B.5 = Yes, but only for employees at certain seniority levels or within certain business functions

Q4B.6 You indicated that your company requires conflict of interest certifications and/or disclosures for employees at certain seniority levels or within certain business functions.

Indicate which business functions require a conflict of interest certification and/or disclosure.
Please select all that apply.

- Personnel with ethics or compliance responsibilities and/or functions
 - Personnel within the Human Resources function
 - Personnel within the Finance and/or Accounting function
 - Executive-level personnel in the Sales or Business Development function
 - Key personnel within the Procurement function
 - Personnel within the Internal Audit function
 - Personnel within the Information Technology function
 - Personnel of certain seniority regardless of function
 - Other (Please specify)
-
- None of the above

Display Question 4B.7:

*If Q4B.5 = Yes, for all employees
Or Q4B.5 = Yes, but only for employees at certain seniority levels or within certain business functions
Or Q4B.5 = No, but we do require ALL employees to certify that they will follow our Code of Conduct and the certification specifically includes language (in addition to any included in the Code of Conduct) regarding disclosing or avoiding conflicts of interest
Or Q4B.5 = No, but we do require SOME employees to certify that they will follow our Code of Conduct and the certification specifically includes language (in addition to any included in the Code of Conduct) regarding disclosing or avoiding conflicts of interest*

Q4B.7 You indicated that your company requires conflict of interest certifications and/or disclosures from employees.

How frequently does your company require these conflicts of interest certifications and/or disclosures? Please select all that apply.

- Upon joining the company
- Annually
- On an as-needed basis as an employee's circumstances change
- Every two years
- Every three years
- Prior to closing any significant transaction, deal, or agreement

Display Question 4B.8:

If Q4B.5 = Yes, for all employees

Or Q4B.5 = Yes, but only for employees at certain seniority levels or within certain business functions

Q4B.8 What technology does your company use to track conflicts of interest certifications and/or disclosures?

- We use a standalone third-party software tool for tracking
- We use an internally developed software tool for tracking
- We use a combination of third-party and internally developed software tools for tracking
- We use manual processes and standalone documents (spreadsheets and text documents) for tracking
- Other (Please specify) _____

End of Section 4B: Due Care

Section 4C: Written Standards, Policies, and Procedures

Q4C.1 Does your company maintain a standalone, company-wide written Code of Conduct (“Code”)?

Supporting Documentation Request: if available, as part of your supporting application materials, please provide a copy of your company's standalone Code of Conduct document.

- Yes, and the Code is publicly available
- Yes, and the Code is not publicly available
- No

Display Question 4C.2:

*If Q4C.1 = Yes, and the Code is publicly available
Or Q4C.1 = Yes, and the Code is not publicly available*

Q4C.2 Is your company's Code available in multiple languages?

- Yes, we translate the Code into all languages necessary for our company's employee base
- No, our company's employee base speaks one primary language and the Code is already in that language
- No, our company does not translate the Code

Q4C.3 Does your company have a policy on policies (i.e., a policy that governs such aspects of your policies as how a new policy is created, how policies are updated, where policies live, the standard template for policies to follow, etc.)?

Supporting Documentation Request: If available, as part of your supporting application materials, please provide a copy of your company's policy on policies.

- Our company maintains a document that defines what a policy is as compared to a procedure and sets out a standard template for all policies (i.e., a policy on policies)
- Policies are largely written and maintained independently without the use of a standard or guide (i.e., without a policy on policies)

Q4C.4 How does your company update written guidance available to employees on ethics- and compliance-related risks? Please select all that apply.

Please note that this question does NOT include practices regarding the Code of Conduct.

- Policies are updated as needed (e.g., in response to changes in regulation or business climate)
 - All policies are reviewed and updated as needed according to a formal schedule (e.g., annually)
 - Global policies are reviewed and updated as needed according to a formal schedule (e.g., annually)
 - All policies are assigned owners who are primarily responsible for content updates
 - Routine root cause analysis following investigations of misconduct includes a review of any relevant policies or lack thereof, and such analysis may be used to update relevant policies
 - Our company updates policies in another way (Please specify)
-

Q4C.5 How does your company assign ownership responsibility over the written guidance provided to employees on ethics- and compliance-related risks? Please select all that apply.

Please note that this question does NOT include practices regarding the Code of Conduct.

- There is a committee that reviews CERTAIN new policies or proposed updates to existing policies and approves them as appropriate
 - There is a committee that reviews ALL new policies or proposed updates to existing policies and approves them as appropriate
 - There is a cross-functional team(s) that reviews policies or proposed updates to existing policies and approves them as appropriate (note that this would be separate from a committee as described in the choices above)
 - Our company assigns policy ownership in another way (Please specify)
-

Q4C.6 Indicate how, if at all, each of the risk topics below are addressed across your company's various written standards. Please select all that apply.

Please note that to qualify as a response a risk does not need to be addressed in a dedicated policy, procedure or guidance document, but it does need to be addressed outside of the Code of Conduct.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide examples of written policies, procedures, processes, and/or guidelines for between three and five of the risk areas selected.

	Risk topic is addressed in a global policy	Risk topic is addressed in a regional, site, or unit-specific policy	Risk topic is addressed in a procedure or process document	Risk topic is addressed in standalone employee guidance (e.g., FAQs or decision trees)
Anti-corruption/bribery	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Antitrust/competition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Conflicts of interest	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Data privacy (e.g., employees, customers and/or consumers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Equal employment opportunity/diversity/discrimination	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial integrity and fraud	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gifts and entertainment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Insider trading	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Intellectual property	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social media	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Workplace harassment (e.g., sexual harassment)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Workplace health and safety	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q4C.7 How are ethics and compliance policies generally communicated throughout your company? Please select all that apply.

- All policies are provided on an intranet site or portal that is accessible across the entire enterprise
 - Policies are translated into all languages necessary to educate our company's employee base on the applicable risk or topic
 - Hyperlinks to policies (separate from the Code of Conduct) are included within some of our training
 - Policies (separate from the Code of Conduct) are provided as part of training
 - Our Code of Conduct contains hyperlinks to applicable policies
 - Our communications about policy-related topics contain hyperlinks to relevant policies
 - Policies are communicated using a mobile app
 - Our policies are distributed in a unique fashion (Please specify)
-

Q4C.8 How are your company's ethics and compliance policies managed and stored across the company? Please select all that apply.

- Policies are managed and stored across various sites, locations, and/or platforms, without a centralized catalog or database
 - Policies are managed and stored in a centralized location (e.g., SharePoint) with no policy management component to the database
 - Policies are managed and stored in a centralized ethics and compliance policy management database or software tool managed by the ethics and compliance function.
 - Policies are managed and stored in a centralized enterprise-wide policy management database or software tool
 - Our company uses another storage/management system or process (Please specify) _____
-

Q4C.9 Does your company track how often any particular policy, procedure, or guidance document is accessed (aside from the Code of Conduct)?

- Yes
- Not sure
- No

End of Section 4C: Written Standards, Policies, and Procedures

Section 4D: Ethics and Compliance Training, Awareness and Communication

Q4D.1 Does your company provide ethics and compliance training to its workforce?

- Yes
 No

Skip To: Q4D.15 If Q4D.1 = No

Q4D.2 Does your company have a formally documented ethics and compliance training curriculum or plan?

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing the training curriculum or plan.

- Yes
 No

Skip To: Q4D.5 If Q4D.2 = No

Q4D.3 Select the following that apply to your company's formally documented ethics and compliance training curriculum or plan. Please select all that apply.

Please note that the responses below require the attribute to be included in the formally documented curriculum or plan.

- Our company's training plan specifies training delivered during onboarding or orientation
- Our company's training plan maps out targeted and varied training to be delivered over multiple years
- Our company's training plan applies only to training to be delivered during the upcoming year
- Our company's training plan is developed using input from functions outside of ethics and compliance
- Our company's training plan is designed to avoid overlapping training (in topic and timing) provided by other departments

- Our company's training plan addresses modality of delivery for each topic and/or audience
- Our company's training plan tracks when training should be refreshed to ensure employees see new content
- Our company's training plan includes a training roll-out schedule
- Other (Please specify) _____

Q4D.4 How does your ethics and compliance training curriculum or plan define target audiences? Please select all that apply.

- Our plan defines target training audiences by employee job level
- Our plan defines target training audiences by employee tenure
- Our plan defines target training audiences by employee function
- Our plan defines target training audiences by employee business unit
- Our plan defines target training audiences by represented status (union/works council or non-union/works council)
- Our plan defines target training audiences by employee location or geography
- Our plan defines target training audiences by whether the employee has direct report(s)
- Our plan does not define targeted training to different audiences—it targets all of the same training to all employees (note that this answer excludes all other choices for this question)
- Our plan defines target training audiences by another unique characteristic (Please specify) _____

Q4D.5 Outside of an ethics and compliance training curriculum or plan, do you use any of the following methods to assign ethics and compliance training during the course of the year?

- We assign training using triggers from other company systems (e.g., buying a plane ticket to a risky jurisdiction, registering to attend an industry trade show)
- We assign training in response to misconduct trends
- When acquiring a new business, we assign necessary training until the acquired entity can be integrated into our ethics and compliance program
- We assign training at a manager or business unit leader's request
- We maintain a library of courses that employees can elect to take on demand
- None of the above

Q4D.6 What percentage of your company's workforce has completed training on the Code of Conduct in the previous two years?

- 96-100 percent
- 90-95 percent
- 80-89 percent
- 70-79 percent
- 50-69 percent
- 30-49 percent
- Less than 30 percent
- Our company does not track Code completion rates
- Our company does not provide training on our Code

Q4D.7 Indicate how your company provides training on the following risk topics. Please select all that apply and leave blank any risk area or topic for which your company does not provide training.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide examples of the ethics and compliance training materials used.

	Topic addressed in Code of Conduct or annual general ethics and compliance training	Topic addressed in online risk-specific training	Topic addressed using live or in-person risk-specific training (i.e., a format allowing for interactivity, possibility of questions/exchange, and tailoring training to moment and audience)
Anti-corruption/bribery	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Antitrust/competition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Protecting company assets (including intellectual property)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Confidential information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Conflicts of interest	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Data privacy laws and regulations relevant to employee, customer, or consumer data	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fair employment/labor standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Financial integrity and fraud	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gifts and entertainment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information technology security	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Insider trading	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Money laundering	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Topic addressed in Code of Conduct or annual general ethics and compliance training	Topic addressed in online risk-specific training	Topic addressed using live or in-person risk-specific training (i.e., a format allowing for interactivity, possibility of questions/exchange, and tailoring training to moment and audience)
Non-retaliation policy and/or whistleblower protections	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Political contributions, activities, and lobbying	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Procurement integrity/dealing with supplier/supply chain oversight	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social media	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Workplace harassment (including sexual harassment)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q4D.8 Which of the following ethics- and compliance-related training practices, if any, does your company utilize? Please select all that apply.

- Pretests to assess baseline knowledge and assign individual curriculum or course(s) accordingly
- Pretests to provide employees an opportunity to “test out” of training (this does not include training assigned based on responses to phishing emails)
- Assessing understanding during the training to assign progressively more sophisticated content
- Progressive course difficulty based on employee tenure
- Allowing employees to select or self-direct the topics covered for a certain amount of their required training

- Incorporating gaming elements or delivering training using augmented reality components
- None of the above

Q4D.9 How does your company encourage or enforce completion of ethics- and compliance-related training? Please select all that apply.

- Timely completion of training is factored into employee performance feedback in either a formal “continuous feedback” process or through formal, periodic performance evaluations
 - Completion of training is factored into raise and/or bonus decisions
 - Department heads or business unit leaders are held accountable for completion rates of their department or unit, with formal consequences administered for leaders that fail to achieve desired completion targets (e.g., negative performance review or reduction in bonus plan)
 - Managers are held accountable for completion rates of their direct reports, with formal consequences administered to managers that fail to achieve desired completion targets (e.g., negative performance review or reduction in bonus plan)
 - Direct reminder email(s) periodically delivered to participants with outstanding training obligations
 - Direct late notice email(s) delivered to participants that failed to complete the training in the desired timeframe
 - The company will terminate the employee’s system access or company/business-related work tools if training is not completed
 - Other encouragement or enforcement techniques (Please specify)
-

Q4D.10 Does your company provide managers training on their special responsibilities with regards to encouraging and supporting compliant and ethical conduct?

Please note that the term “manager” as used in this question means people managers (i.e., those with direct reports). This training cannot be limited solely to manager training regarding sexual harassment as required in specific jurisdictions.

For clarity, this training may overlap with education regarding other relevant leadership topics, but it must include the manager's role in supporting the company's culture of compliant and ethical conduct (i.e., one or more ethics and compliance topics set forth in the possible responses to question 4D.12).

Supporting Documentation Request: if available, as part of your supporting application materials please provide documentation of the manager-specific training.

- Yes, to all managers
- Yes, to some managers but not all
- No

Skip To: Q4D.14 If Q4D.10 = No

Q4D.11 You indicated that your organization provides managers training on their special responsibilities with regards to encouraging and supporting ethical and compliant conduct.

Select the following that applies to said manager training on ethics and compliance. Please select all that apply.

- Conducted as a part of new manager orientation (either for new hires or promotions)
- Conducted on a periodic basis, at least every two years
- Content is reviewed and refreshed periodically, at least every two years
- Tracked for completion rates
- Completion of training is a part of a manager's performance evaluation
- Completion is mandatory for all managers
- None of the above

Q4D.12 You indicated that your organization provides managers training on their special responsibilities with regards to encouraging and supporting ethical and compliant conduct.

Select the following topics that are addressed by said manager training. Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application

materials, please provide examples of the topics included in the manager-specific training.

- Communicating ethics to subordinates, including expectations around frequency of communications
 - Leveraging resources available to managers to support their communications regarding ethics and compliance topics
 - Promoting a culture of ethics and compliance
 - Incorporating ethics in business decision making
 - Handling employee reports or concerns
 - Understanding which types of concerns must be escalated so the company is aware of them
 - Identifying and preventing retaliation
 - Creating and maintaining an open-door environment
 - Conducting employment interviews
 - Understanding techniques to ensure active listening to employee concerns
 - Other topics (Please specify)
-

Q4D.13

You indicated that your organization provides managers training on their special responsibilities with regards to encouraging and supporting compliant and ethical conduct.

What percentage of your manager training is typically delivered in-person?

- 81-100 percent
- 61-80 percent
- 41-60 percent
- 21-40 percent
- 1-20 percent

None of our manager-specific training is delivered in-person

Q4D.14 Identify which of the following methods your company utilizes to measure the effectiveness of its ethics and compliance training. Please select all that apply.

Root cause analysis following investigations of misconduct that includes a review of any relevant training, or lack thereof, and its effectiveness on those individuals involved

Culture of ethics employee assessments (at least every two years)

Documented employee or manager feedback, collected through interviews or focus groups after roll-out

Employee knowledge assessments, performed at least annually and separately from training

Documented employee or manager feedback when training is being developed or before it is formally rolled out

Tracking misconduct trends

Tracking reporting frequency against training roll-out timing

Tracking frequency of policy/code/resource downloads from the ethics intranet site or portal in the context of when training is administered

Soliciting employee evaluation of training on questionnaire/survey/feedback form (or similar mechanism) directly following completion of training

Other methods (Please specify)

None of the above

Q4D.15 Does your ethics and compliance function maintain a documented ethics and compliance communication plan?

Supporting Documentation Request: if available, as part of your supporting application materials please provide documentation evidencing the ethics and compliance communication plan.

Yes

No

Skip To: Q4D.18 If Q4D.15 = No

Q4D.16 Select the following that apply to your company's documented ethics and compliance communications plan. Please select all that apply.

- Addresses communication initiatives only for the upcoming year
- Addresses communication initiatives across multiple years
- Developed through cross-functional collaboration
- Includes a roll-out schedule
- Addresses communication delivery mechanism for each topic or audience
- Calls for implementation by different functions or business units (e.g., Compliance, HR, Finance, Sales)
- Incorporates messages delivered by different leaders (e.g., CEO, heads of functions and/or business units other than compliance or ethics, other managers, etc.)
- Incorporates messages delivered by non-leader employees, such as line-level employees communicating messages to their peers (i.e., employees not included in the prior answer option specific to leaders)
- None of the above

Q4D.17 How does your company's ethics and compliance communications plan define its target audiences? Please select all that apply.

- Our plan targets communications according to employee job level
- Our plan targets communications according to employee function
- Our plan targets communications according to employee business unit

- Our plan targets communications according to employee location or geography
- Our plan targets communications based on misconduct trends or related data
- Our plan targets all communications to all employees—it targets all of the same communications to all employees (note that this answer excludes all other choices for this question)
- Our plan targets communications according to another unique characteristic (Please specify) _____

Q4D.18 Which communication modalities (aside from formal training programs) does your company use to communicate ethics and compliance messages within your company? Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide examples of the communications selected below.

- Company e-bulletin or newsletter
- Printed and/or electronic information materials (such as brochures, guidebooks, posters, wallet cards, table tents, and/or checklists)
- Video/dedicated internal TV channel
- Digital signage
- Computer screen savers
- Emails
- Podcasts
- Town hall meetings
- Periodic company-wide kick-off meetings
- Senior executives' meetings

- Intranet portal dedicated to ethics and compliance
 - Ethics blog or intranet forum
 - Interactive scenarios, games, quizzes, and/or vignettes
 - Periodic compliance "road show" or site visits by ethics and compliance
 - Ethics-related promotional or merchandising items
 - Short real-life scenarios or other educational videos
 - Outside speakers addressing ethics or compliance matters
 - Company-wide initiatives or programs (e.g., "Compliance Month," "Ethics Everywhere")
 - Mobile-friendly material (optimized for mobile usage)
 - Dedicated mobile application for phones and/or tablets
 - Facebook, Twitter, or other social media platforms
 - Other communication modalities (Please specify)
-
- None of the above

Q4D.19 Select the following ethics and compliance communication resources, if any, that your company provides to managers/supervisors in order to help them promote ethics and compliance within the company. Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials please provide documentation evidencing examples of the communications indicated.

- Ethics and compliance communication toolkit(s) (e.g., language to include in an email, links to ethics and compliance newsletters to distribute to employees, responses to questions that may arise, FAQs for current issues or initiatives), available on demand or distributed to managers directly

- Meetings-in-a-box (e.g., suggestions of topics to discuss, speaking guides, presentation materials)
 - A schedule of potential topics to discuss throughout the year and guidance on expected frequency
 - Communications regarding ethics and compliance topics for the manager to cascade through his or her organization
 - Regularly scheduled discussion time with ethics and compliance personnel (e.g., brown bag lunches, seminars, or ethics and compliance team roadshow)
 - Tools and resources to allow managers to recognize or incentivize direct reports that exhibit ethical conduct or promote the ethics and compliance program
 - Videos, online vignettes, or other educational multimedia resources
 - Research, whitepapers, or curated news reports on ethics and compliance issues specifically directed at managers
 - Other resources (Please specify)
-

Q4D.20 Select which types of communication involving senior executives outside the ethics and compliance function, such as the CEO, are used to discuss ethics and compliance within your company. Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials please submit examples of such communications.

- Personalized letter of introduction to the written Code of Conduct
- Personalized introduction to ethics and compliance training
- Emails to the workforce
- Onboarding video
- Intranet site video

- Video transmitted to employees
 - Podcast
 - Town hall, annual kick-off, or other company-wide meetings lead by senior leadership
 - Internal meetings involving senior leadership
 - Interactive Q&A forum, chat functionality
 - Blogs
 - Newsletter
 - Intracompany social communication platforms (e.g., Chatter, Yammer, Slack)
 - Other types of communication (Please specify)
-

Q4D.21 Are your company's non-employee directors involved in communicating ethics and compliance to employees (e.g., by signing the introductory letter in the Code of Conduct, speaking at employee gatherings, etc.)?

Yes (Please explain how non-employee directors are engaged)

No

Q4D.22 Do senior executive leaders include examples of ethical decisions they have faced at various points of their career in their communications to employees, regardless of modality or format?

Supporting Documentation Request: if available, as part of your supporting application materials please submit examples of such communications.

Yes

No

Q4D.23 Does the ethics and compliance function include examples of real world ethical or

compliance dilemmas or issues in their communications? Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials, please submit examples of such communications.

- Yes, we use things that have happened within our organization (with or without details omitted to preserve anonymity)
- Yes, we use things that have happened outside our organization (i.e., in the news or at peer companies)
- No

Q4D.24 Identify which of the following methods your company utilizes to measure the effectiveness of its ethics and compliance communications. Please select all that apply.

- Root cause analysis following investigations of misconduct that includes a review of any relevant communications, or lack thereof, and their effectiveness on those individuals involved
- Tracking open rates on electronic communications
- Tracking views on videos or clicks on links, articles, or other online resources
- Documented employee or manager feedback when communications are being developed or before they are formally rolled out
- Tracking misconduct trends
- Tracking reporting frequency against communication roll-out timing
- Tracking frequency of policy/code/resource downloads from the company intranet site or portal in the context of when communications are launched
- Other methods (Please specify)

- None of the above

End of Section 4D: Ethics and Compliance Training, Awareness and Communication

Section 4E: Detection, Monitoring, and Auditing

Q4E.1 Does your company use a misconduct reporting system (e.g., internal reporting mechanisms, dedicated email address, internal or third-party maintained hotlines, etc.)?

- Yes, but reporting individuals are not given the option to remain anonymous
- Yes, and reporting individuals are given the option to remain anonymous where allowed by applicable law
- No, our company does not use a misconduct reporting system

Display Question 4E.2:

If Q4E.1 = Yes, and reporting individuals are given the option to remain anonymous where allowed by applicable law

Q4E.2 For locations where anonymous reporting is permitted by law, approximately what percentage of hotline reports received are anonymous? Please use the most recent full years' worth of hotline data available.

- Less than 10 percent
- 11-20 percent
- 21-30 percent
- 31-40 percent
- 41-50 percent
- 51-60 percent
- 61-70 percent
- 71-80 percent
- 81-90 percent
- 91-100 percent

Q4E.3 Does your company have a system or tool to manage reports and subsequent investigations?

- Yes, our company uses a tracking tool or case management system that tracks reports and related investigations regardless of how the report was originally made (e.g., tracks reports made to a manager and escalated the same as those as those made directly to the misconduct reporting system)
- Yes, our company uses a tracking tool or case management system with the ability to

log and track reports and related investigations, but only for reports made or originated through the misconduct reporting system (i.e., tracks only reports made to the company hotline)

- Other (Please specify) _____
- No, our company does not have such a system or tool in place

Display Question 4E.4:

If Q4E.3 = Yes, our company uses a tracking tool or case management system that tracks reports and related investigations regardless of how the report was originally made (e.g., tracks reports made to a manager and escalated the same as those as those made directly to the misconduct reporting system)

Or Q4E.3 = Yes, our company uses a tracking tool or case management system with the ability to log and track reports and related investigations, but only for reports made or originated through the misconduct reporting system (i.e., tracks only reports made to the company hotline)

Or Q4E.3 = Other (Please specify)

Q4E.4 How are reports made to managers entered into your tracking system for review and potential investigation? Select all that apply.

- Manager can report matter through hotline or reporting tool (a “proxy report”)
- Direct creation by manager of new matter in tracking system (not through a reporting or hotline interface)
- Direct line of communication between manager and HR, who enters the matter into the tracking system
- Direct line of communication between manager and ethics and compliance team, who enters the matter into the tracking system
- Direct line of communication between manager and ombudsperson, who enters the matter into the tracking system
- None of the above

Q4E.5 Indicate the resources or tools available for reporting misconduct and raising concerns at your company. Please select all that apply.

- Open-door policy for in-person reporting to direct supervisors
- Open-door policy for in-person reporting to senior/executive management
- Third-party-maintained hotline
- In-house hotline

- Ombudsperson
 - Web-based reporting tool
 - Company-wide reporting email account
 - App or mobile-specific reporting tool or platform
 - Labor union or works counsel (or equivalent) grievance procedure
 - Other resources or tools (Please specify)
-

Q4E.6 Separate from reports to the Board or other governing authority, does your organization communicate how many concerns were reported, the types of concerns reported, and the results of reports and investigations? Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing the report or templates of the report(s) used.

- Yes, and we make this information available to the public as a standalone report
 - Yes, and we make this information available to the public in our CSR report and/or in our annual report
 - Yes, and we make this information available to all employees
 - Yes, and we circulate this information to C-suite-level leaders beyond those involved in board reporting
 - Yes, and we circulate this information to other levels of management
 - No, we do not communicate this information
-

Q4E.7 Does your company evaluate the design and effectiveness of its ethics and compliance program?

Note that for the purposes of this question, an evaluation is a process conducted either

internally or by a third party, following a documented structure, with the primary purpose of assessing the efficacy of the ethics and compliance program. This process must result in some form of documentation, such as a report.

Please exclude any SOX Section 404-related evaluations or participation in this or previous World's Most Ethical Companies benchmarking processes when selecting an answer.

Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation demonstrating what components of the program are evaluated, the quality of such evaluations, and the frequency.

- We conduct periodic evaluations of the effectiveness of the entire ethics and compliance program using internal resources as part of our risk assessment process
- We conduct periodic evaluations of the effectiveness of the entire ethics and compliance program using internal resources (e.g., ethics and compliance, Internal Audit) as a separate process from our risk assessment process
- We conduct periodic evaluations of the effectiveness of the entire ethics and compliance program using external resources (e.g., an outside consultant)
- We conduct periodic evaluations of the ethics and compliance program that focus on a specific element or portion of the program on a rotating basis
- Our evaluation is an ongoing process without a formal schedule
- No, we do not conduct a formal evaluation of our program

Skip To: Q4E.12 If Q4E.7 = No, we do not conduct a formal evaluation of our program

Display Question 4E.8:

If Q4E.7 = We conduct periodic evaluations of the effectiveness of the entire ethics and compliance program using internal resources as part of our risk assessment process

Or Q4E.7 = We conduct periodic evaluations of the effectiveness of the entire ethics and compliance program using internal resources (e.g., ethics and compliance, Internal Audit) as a separate process from our risk assessment process

Q4E.8 You indicated your organization conducts periodic evaluations of the effectiveness of the entire ethics and compliance program using internal resources (such as internal audit, ERM, or ethics and compliance).

How often does your company conduct these periodic internal evaluation(s) of the entire ethics and compliance program?

- Annually

- Every two years
- Every three years
- Every four years
- Every five years
- Less often than every five years

Display Question 4E.9:

If Q4E.7 = We conduct periodic evaluations of the effectiveness of the entire ethics and compliance program using external resources (e.g., an outside consultant)

Q4E.9 You indicated your organization conducts periodic evaluations of the effectiveness of the entire ethics and compliance program using external resources (e.g., consultants).

How often does your company conduct these external evaluation(s) of the entire ethics and compliance program?

- Annually
- Every two years
- Every three years
- Every four years
- Every five years
- Less often than every five years

Display Question 4E.10:

If Q4E.7 = We conduct periodic evaluations of the effectiveness of the entire ethics and compliance program using internal resources as part of our risk assessment process

Or Q4E.7 = We conduct periodic evaluations of the effectiveness of the entire ethics and compliance program using internal resources (e.g., ethics and compliance, Internal Audit) as a separate process from our risk assessment process

Q4E.10

You indicated your organization conducts periodic evaluations of the effectiveness of the entire ethics and compliance program using internal resources.

Which components of the ethics and compliance program are evaluated during this internally conducted evaluation process? Please select all that apply.

- Organizational culture of ethics

- Risk assessment processes/protocols
- Employee knowledge of compliance issues
- Working relationships between ethics and compliance and other related control functions (i.e., internal audit, human resources)
- Code of Conduct
- Ethics and compliance policies, procedures, and guidance, including whether they have been updated to account for recently passed regulations
- Ethics and compliance training curriculum or program
- Ethics and compliance communication program
- Procedures and controls surrounding conflicts of interest
- Procedures and controls surrounding gifts and entertainment (e.g., meals and hospitality)
- Procedures and controls in place to try to ensure that individuals in leadership positions (or positions of trust) have not engaged in illegal activities or other misconduct
- The system used to receive and/or track reports of alleged misconduct
- Investigation process, results, and root cause analysis
- Board oversight
- Third party due diligence
- Procedures and controls to prevent retaliation against employees reporting possible misconduct
- The extent to which the program has evolved to address significant changes to the business (e.g., geographic footprint, acquisitions)
- Procedures and processes to incentivize ethical behavior (e.g., ethics and

compliance input into new or updated compensation plans, use of employee awards, changes to the performance evaluation system)

Display Question 4E.11:

If Q4E.7 = We conduct periodic evaluations of the effectiveness of the entire ethics and compliance program using external resources (e.g., an outside consultant)

Q4E.11

You indicated your organization conducts periodic evaluations of the effectiveness of the entire ethics and compliance program using external resources (e.g., consultants).

Which components of the ethics and compliance program are evaluated during the external evaluation process? Please select all that apply.

- Organizational culture of ethics
- Risk assessment processes/protocols
- Employee knowledge of compliance issues
- Working relationships between ethics and compliance and other related control functions (i.e., internal audit, human resources)
- Code of Conduct
- Ethics and compliance policies, procedures, and guidance, including whether they have been updated to account for recently passed regulations
- Ethics and compliance training curriculum or program
- Ethics and compliance communication program
- Procedures and controls surrounding conflicts of interest
- Procedures and controls surrounding gifts and entertainment (e.g., meals and hospitality)
- Procedures and controls in place to try to ensure that individuals in leadership positions (or positions of trust) have not engaged in illegal activities or other misconduct
- The system used to receive and/or track reports of alleged misconduct

- Investigation process, results, and root cause analysis
 - Board oversight
 - Third party due diligence
 - Procedures and controls to prevent retaliation against employees reporting possible misconduct
 - The extent to which the program has evolved to address significant changes to the business (e.g., geographic footprint, acquisitions)
 - Procedures and processes to incentivize ethical behavior (e.g., ethics and compliance input into new or updated compensation plans, use of employee awards, changes to the performance evaluation system)
-

Display Question 4E.12:

If Q4E.7 = We conduct periodic evaluations of the ethics and compliance program that focus on a specific element or portion of the program on a rotating basis

Q4E.12 You indicated your organization conducts periodic evaluations of the ethics and compliance program that focus on a specific element or portion of the program on a rotating basis.

Which components of the ethics and compliance program have been evaluated on a rotating basis in the last three years? Please select all that apply.

- Organizational culture of ethics
- Risk assessment processes/protocols
- Employee knowledge of compliance issues
- Working relationships between ethics and compliance and other related control functions (i.e., internal audit, human resources)
- Code of Conduct
- Ethics and compliance policies, procedures, and guidance, including whether they have been updated to account for recently passed regulations

- Ethics and compliance training curriculum or program
- Ethics and compliance communication program
- Procedures and controls surrounding conflicts of interest
- Procedures and controls surrounding gifts and entertainment (e.g., meals and hospitality)
- Procedures and controls in place to try to ensure that individuals in leadership positions (or positions of trust) have not engaged in illegal activities or other misconduct
- The system used to receive and/or track reports of alleged misconduct
- Investigation process, results, and root cause analysis
- Board oversight
- Third party due diligence
- Procedures and controls to prevent retaliation against employees reporting possible misconduct
- The extent to which the program has evolved to address significant changes to the business (e.g., geographic footprint, acquisitions)
- Procedures and processes to incentivize ethical behavior (e.g., ethics and compliance input into new or updated compensation plans, use of employee awards, changes to the performance evaluation system)

Q4E.13 Does your company track any entertainment (including meals and hospitality) and/or gifts given or received by your company's employees?

- Yes, our company tracks gifts and/or entertainment
- No, our company does not track gifts or entertainment

Skip To: End of Section 4E If Q4E.13 = No, our company does not track gifts or entertainment

Q4E.14 What technology do you use to track gifts and entertainment given to or provided by

your employees? Please select all that apply.

- We use a standalone third-party software tool for tracking gifts and entertainment
 - We use an internally developed software tool for tracking gifts and entertainment
 - We use a combination of third-party and internally developed software tools for tracking gifts and entertainment
 - We use manual processes and standalone documents (spreadsheets and text documents) for tracking gifts and entertainment
 - We track gifts and entertainment using accounting codes
 - Other (Please specify)
-

Display Question 4E.15:

*If Q4E.14 = We use a standalone third-party software tool for tracking gifts and entertainment
Or Q4E.14 = We use an internally developed software tool for tracking gifts and entertainment
Or Q4E.14 = We use a combination of third-party and internally developed software tools for tracking gifts and entertainment*

Q4E.15 Which of the following features does your tool for tracking gifts and entertainment have? Please select all that apply.

- Allows for advance approvals
- Allows for retroactive notification and/or disclosures
- Allows for cumulative tracking by recipient and company or entity (including government entities)

Q4E.16 To what extent does your company track **gifts received** by your employees?

- Our company tracks ALL gifts received
- Our company tracks only gifts that exceed a specific value threshold
- Our company tracks only gifts that meet certain criteria (other than value threshold)
- Our company does not track gifts received by employees

Other (Please specify) _____

Q4E.17 To what extent does your company track **gifts provided** by your employees?

- Our company tracks ALL gifts provided by our employees
- Our company tracks only gifts that exceed a specific value threshold
- Our company tracks only gifts that meet certain criteria (other than value threshold)
- Our company does not track gifts provided by employees
- Other (Please specify) _____

Q4E.18 To what extent does your company track **entertainment received** by your employees?

- Our company tracks ALL entertainment received by our employees, regardless of value or amount
- Our company tracks only entertainment that exceeds a specific value threshold
- Our company tracks only entertainment that meets certain criteria (other than value threshold)
- Our company does not track entertainment received by employees
- Other (Please specify) _____

Q4E.19 To what extent does your company track **entertainment provided** by your employees?

- Our company tracks ALL entertainment provided by our employees
- Our company tracks only entertainment that exceeds a specific value threshold
- Our company tracks only entertainment that meets certain criteria (other than value threshold)
- Our company does not track entertainment provided by employees
- Other (Please specify) _____

End of Section 4E: Detection, Monitoring, and Auditing

Section 4F: Enforcement, Discipline, and Incentives

Q4F.1 Does your company have a written misconduct investigation process?

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing the depth and breadth of the investigations process.

- Yes, we have one global process (this may include regional variations, but all under one global process)
- Yes, we do not have a global process but do have different regional processes to account for variations in local law
- No

Q4F.2 How is your organization training investigators?

- The ethics and compliance function trains those investigators that conduct compliance investigations, and other units train their investigators separately
- All investigators are trained using the same protocol, and all investigators use the same template for investigations
- We do not train investigators, but rely on their professional backgrounds instead

Q4F.3 Does your organization have a process for gathering feedback from individuals who participated in an investigation after the investigation is closed?

- Yes, we conduct follow-up conversations with known reporters and significant witnesses
- Yes, we conduct follow-up conversations with known reporters
- Yes, we conduct a survey-based follow up to ask about their experience with our investigators and investigation process
- No

Q4F.4 Is your company currently conducting root cause analysis to assign root cause(s) to incidences of misconduct?

- Yes, on all investigations, regardless of how the issue was raised or the investigator
- Yes, on all investigations of a certain level of significance regardless of how the issue was raised or the investigator, but not on all investigations

- Yes, but only on those investigations handled by the ethics and compliance function
- Yes, we are consistently conducting root cause analysis after investigations, but it is based on the following criteria, which are different from the criteria in the options above (Please specify): _____
- No, we are not consistently conducting root cause analysis after investigations

Display Question 4F.5:

*If Q4F.4 = Yes, on all investigations, regardless of how the issue was raised or the investigator
Or Q4F.4 = Yes, on all investigations handled by the ethics and compliance function and some other functions, but not all functions that conduct investigations
Or Q4F.4 = Yes, on all investigations handled by the ethics and compliance function only*

Q4F.5 Does your organization have a formal taxonomy for your root cause analysis?

- Yes, we are using a formal taxonomy
- No, our investigators use a text response field in their reporting on an investigation to capture their root cause analysis

Q4F.6 Indicate which established procedures your company has to protect employees who report suspected misconduct. Please select all that apply.

Please note this question applies to those employees who identify themselves when making the report.

- Monitor sick day usage of the reporting individual to watch for indications of a change in job satisfaction or commitment or comfort being at work
- Monitor the reporting individual for any change in performance evaluations or job assignments
- Monitor whether the reporting individual has a change in job status (e.g., termination or added to a proposed reduction in force)
- A process to have someone affirmatively follow up with the reporting individual within a certain amount of time to inquire whether they have felt any form of retaliation
- Inform the reporting individual at the time of making the report of the company's non-retaliation policy and what to do if they feel retaliated against
- A process to determine whether an employee facing involuntary termination has reported misconduct or been a witness in an investigation of alleged misconduct (please

note that the process need not result in the employee not being terminated, but must result in that determination being made in an informed manner given the employee's status as a reporter or witness in an investigation)

Provide contact information for a specific person for them to contact with any question or concerns

Other unique procedures to protect employees (Please specify)

None of the above

Q4F.7 Which mechanisms, if any, does your company utilize to incentivize employees who engage in ethical conduct or who actively support compliance initiatives/compliance performance metrics? Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing the mechanisms used to incentivize employees as described below.

Formal evaluation of ethical conduct as part of ongoing performance feedback in either a formal "continuous feedback" process or through a formal, periodic performance evaluation

Formal evaluation of ethical business conduct as part of promotion decisions

Formal component of manager bonus or other compensation determinations

Awards and recognitions showcasing ethical business conduct

Colleague-to-colleague recognition through an employee recognition system (e.g., a "thank you"-type functionality) that tracks the information

Q4F.8 Select the following that best describes your company's exit interview process.

Our company does not routinely conduct exit interviews

Our company routinely conducts exit interviews, but they do not include questions that are designed to assess whether the departing employee was aware of or concerned about potentially unethical events that were taking place at our company

Our company routinely conducts exit interviews that include questions that are designed to assess whether the departing employee was aware of or concerned about potentially



unethical events that were taking place at our company

End of Section 4F: Enforcement, Discipline, and Incentives

Section 4G: Measurement of Ethical Culture

Q4G.1 Which of the following methods, if any, are part of your company's approach to measure employee perceptions of ethical culture and/or the ethics and compliance program? Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation demonstrating your company's efforts to measure corporate ethical culture.

- Employee focus groups
 - Employee interviews (non-managers) to assess ethical culture and employee perceptions
 - Management interviews to assess ethical culture and employee perceptions
 - Employee survey(s) that includes questions specific to the ethical culture of your company
 - Surveys of external stakeholders, such as clients, customers, vendors, or partners, that include questions specific to the ethical culture of your company
 - Visits by ethics and compliance personnel to sites outside of headquarters
 - Reviewing social media (e.g., Twitter, Facebook) or other websites that include feedback or comments about the company (e.g., Glassdoor.com)
 - Monitoring a real-time, direct-to-employee feedback system or tool (e.g. Salesforce Feedback app, Yammer comments, intranet site comments) that allows for comments, suggestions, or input
 - Our company's culture measurement uses a unique approach (Please specify)
-

Display Question 4G.2:

If Q4G.1 = Visits by ethics and compliance personnel to sites outside of headquarters

Q4G.2 You indicated your organization conducts visits by ethics and compliance personnel to sites outside of headquarters.

Approximately how frequently do these site visits by ethics and compliance personnel occur?

- More frequently than monthly
- Monthly
- Every two months
- Quarterly
- Twice per year
- Less frequently than twice per year
- Ad hoc

Display Question 4G.3:

If Q4G.1 = Employee survey(s) that includes questions specific to the ethical culture of your company

Q4G.3 You indicated that your company uses an employee survey(s) to measure employee perceptions of ethical culture and/or the compliance program.

Which of the following types of surveys are used to measure ethical culture within your organization? Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials please provide documentation evidencing the survey method(s) selected.

- A survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program
- Include questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey
- Include questions on measuring employee perceptions of ethical culture and/or the compliance program as part of employee exit questionnaires
- Include questions on measuring employee perceptions of ethical culture and/or the compliance program as part of employee onboarding questionnaires or assessments
- Short "pulse"-type surveys distributed multiple times in a given calendar year that include questions on measuring employee perceptions of ethical culture and/or the compliance program
- Other (Please specify) _____

Display Question 4G.4:

If Q4G.3 = A survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program

Q4G.4 You indicated that your company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program.

Please indicate the frequency with which this survey is administered.

- More frequently than quarterly
- Quarterly
- Twice per year
- Annually
- Every 18 months
- Every two years
- Every three years
- Less frequently than every three years
- Ad hoc or as desired

Display Question 4G.5:

If Q4G.3 = Include questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey

Q4G.5 You indicated that your company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey.

Please indicate the frequency with which engagement surveys are generally administered.

- More frequently than quarterly
- Quarterly
- Twice per year
- Annually
- Every 18 months
- Every two years
- Every three years

- Less frequently than every three years
- Ad hoc or as desired

Display Question 4G.6:

If Q4G.3 = A survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program

Q4G.6 You indicated that your company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program.

What percentage of your total global workforce was offered the opportunity to participate in the most recent survey used to measure ethical culture and employee perceptions?

- Less than 30 percent
- 30-39 percent
- 40-49 percent
- 50-59 percent
- 60-69 percent
- 70-79 percent
- 80-89 percent
- 90-100 percent

Display Question 4G.7:

If Q4G.3 = Include questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey

Q4G.7

You indicated that your company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey.

What percentage of your total global workforce was offered the opportunity to participate in the most recent employee engagement survey which included ethical culture and employee perception questions?

- Less than 30 percent
- 30-39 percent
- 40-49 percent



- 50-59 percent
- 60-69 percent
- 70-79 percent
- 80-89 percent
- 90-100 percent

Display Question 4G.8:

If Q4G.3 = A survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program

Q4G.8

You indicated that your company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program.

Of the employees who were provided the opportunity to respond to your survey(s), what percentage actually responded?

- Less than 30 percent
- 30-39 percent
- 40-49 percent
- 50-59 percent
- 60-69 percent
- 70-79 percent
- 80-89 percent
- 90-100 percent

Display Question 4G.9:

If Q4G.3 = Include questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey

Q4G.9

You indicated that your company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey.

Of the employees who were provided the opportunity to respond to your survey(s), what percentage actually responded?

- Less than 30 percent
- 30-39 percent
- 40-49 percent
- 50-59 percent
- 60-69 percent
- 70-79 percent
- 80-89 percent
- 90-100 percent

Display Question 4G.10:

If Q4G.3 = A survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program

Q4G.10

You indicated that your company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program.

Indicate whether your company conducts this survey internally or with the assistance of a third party.

- Our company develops and administers this survey internally
- Our company develops and administers the survey using a third party (Please specify which third party) _____

Display Question 4G.11:

If Q4G.3 = Include questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey

Q4G.11

You indicated that your company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey.

Indicate whether your company conducts this survey internally or with the assistance of a third party.

- Our company develops and administers this survey internally
- Our company develops and administers the survey using a third party (Please specify which third party) _____

Display Question 4G.12:

If Q4G.3 = A survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program

Q4G.12 You indicated that your company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program.

Which topics are included within this survey? Please select all that apply.

- Employee's awareness of compliance resources (e.g., hotline awareness, Code of Conduct awareness)
- Employee's opinion of executive ethical leadership or tone from the top
- Employee's opinion of manager's ethical leadership or mood from the middle
- Whether the employee has observed misconduct
- Whether the employee is comfortable reporting misconduct
- Employee's perceptions of the ethics and compliance function
- Employee's perceptions of organizational justice (i.e., whether the company acts fairly)
- Employee's perceptions of his or her peer environment and culture
- Employee's perceptions of the effectiveness of the Code of Conduct
- Employee's perceptions of the effectiveness of policies
- Employee's perceptions of the effectiveness of compliance training
- Whether the employee feels pressure to commit misconduct
- Perceived frequency with which managers discuss ethics- or compliance-related issues
- Other topics (Please specify)

Display Question 4G.13:

If Q4G.3 = Include questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey

Q4G.13 You indicated that your company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey.

Which topics are included within the engagement survey? Please select all that apply.

- Employee's awareness of compliance resources (e.g., hotline awareness, Code of Conduct awareness)
- Employee's opinion of executive ethical leadership or tone from the top
- Employee's opinion of manager's ethical leadership or mood from the middle
- Whether the employee has observed misconduct
- Whether the employee is comfortable reporting misconduct
- Employee's perceptions of the ethics and compliance function
- Employee's perceptions of organizational justice (i.e., whether the company acts fairly)
- Employee's perceptions of his or her peer environment and culture
- Employee's perceptions of the effectiveness of the Code of Conduct
- Employee's perceptions of the effectiveness of policies
- Employee's perceptions of the effectiveness of compliance training
- Whether the employee feels pressure to commit misconduct
- Perceived frequency with which managers discuss ethics- or compliance-related issues

Other topics (Please specify)

Display Question 4G.14:

If Q4G.3 = Short "pulse"-type surveys distributed multiple times in a given calendar year that include questions on measuring employee perceptions of ethical culture and/or the compliance program

Q4G.14 You indicated that your company conducts frequent "pulse"-type surveys that include questions on measuring employee perceptions of ethical culture and/or the compliance program.

Which topics are generally included within these surveys? Please select all that apply.

Employee's awareness of compliance resources (e.g., hotline awareness, Code of Conduct awareness)

Employee's opinion of executive ethical leadership or tone from the top

Employee's opinion of manager's ethical leadership or mood from the middle

Whether the employee has observed misconduct

Whether the employee is comfortable reporting misconduct

Employee's perceptions of the ethics and compliance function

Employee's perceptions of organizational justice (i.e., whether the company acts fairly)

Employee's perceptions of his or her peer environment and culture

Employee's perceptions of the effectiveness of the Code of Conduct

Employee's perceptions of the effectiveness of policies

Employee's perceptions of the effectiveness of compliance training

Whether the employee feels pressure to commit misconduct

Perceived frequency with which managers discuss ethics- or compliance-related



issues

Other topics (Please specify)

Display Question 4G.15:

If Q4G.3 = Short “pulse”-type surveys distributed multiple times in a given calendar year that include questions on measuring employee perceptions of ethical culture and/or the compliance program

Q4G.15 You indicated that your company conducts frequent “pulse”-type surveys that include questions on measuring employee perceptions of ethical culture and/or the compliance program.

Please describe the frequency, scope, and methodologies used in the administration of these surveys. Please limit your response to no more than 1,000 characters.

Q4G.16 Please describe what types of analysis, if any, is being done following the completion of your company’s assessment of employees’ perception of culture of ethics and/or the compliance program. This includes how the culture survey or other results are communicated and used.

Please limit your response to no more than 1,000 characters.

End of Section 4G: Measurement of Ethical Culture

Section 5: Third Party Management

Q5.1 Does your company maintain a third party (e.g., supplier, agent, intermediary, reseller) Code of Conduct ("Third-Party Code")?

- Yes
- No

Skip To: Q5.4 If Q5.1 = No

Q5.2 You indicated that your company maintains a Third Party Code. Is your Third Party Code translated into multiple languages?

- Yes
- No
- No, because our third-party universe is monolingual

Q5.3 You indicated that your company maintains a Third Party Code. Which of the following risk areas are included in the Third Party Code? Please select all that apply.

- Conflicts of interest
- Gifts and entertainment
- Responsibility to report concerns to the company
- Anti-bribery and corruption
- Sustainability expectations
- Labor laws and human rights
- Protecting company confidential information
- Workplace safety and health
- Discrimination/harassment/bullying

- Accurate records/company's right to audit
- Conflict minerals, as relevant
- Trade controls, as relevant
- Reminder of the company's non-retaliation policy

Q5.4 Does your company maintain a procurement policy that addresses key aspects of third party selection, management, and compliance oversight?

- Yes
- No

Q5.5 What information, if any, do you consider in your ethics and compliance due diligence of third parties? Please select all that apply.

- Ownership information
 - Information pertaining to use of sub-contractors on work to be done for the company
 - Policy documentation
 - Training program for the third party's employees
 - Ethical/compliance track record and practices
 - Human rights and labor conditions
 - Environmental performance
 - Social or community programs and performance
 - Data security practices or controls
 - Other (Please specify)
-

None of the above

Q5.6 How does your company establish its ethics and compliance expectations and requirements for third parties that pose a material compliance, ethics, and/or reputation risk? Please select all that apply.

- Third party acknowledgment and compliance with our company's Code of Conduct is a required condition of doing business with our company
- Our third parties are expected to follow our company's Code of Conduct, but it is not a contractual requirement
- Third party acknowledgment and compliance with our Supplier/Distributor/Third Party Code of Conduct is required in order to do business with our company
- A Third Party Code is provided and, while adherence to the Third Party Code is not an explicit contractual requirement, third parties are expected to follow the Third-Party Code
- Third party contracts include explicit provisions regarding supplier adherence to certain of our company's ethics and compliance expectations
- Our third parties are encouraged or required to obtain a third-party certification for ethics and compliance
- Our company requires third parties to follow an industry code of conduct (e.g., the Electronics Industry Citizenship Coalition Code of Conduct)

Q5.7 Do you conduct an assessment to determine if the third party has the capabilities and controls to meet the ethics and compliance requirements stated in their contract with your organization?

- Yes, for all risk areas
- Yes, for most risk areas
- Yes, for some risk areas
- No

Q5.8 Which of the following best describes how your organization evaluates the performance of

a supplier or third party?

- They are solely evaluated based on their business performance
- We discuss some ethics and compliance issues during our business performance reviews
- We have a third party scorecard or written evaluation that specifically includes their ethics and compliance performance

Q5.9 What training or other resources does your organization make available to suppliers or other third parties to help them build their own ethics and compliance practices? Please select all that apply.

- Some of our company's ethics and compliance communication initiatives specifically target our third parties
- Our company provides our third parties with ethics and compliance training assistance or resources
- Our company's hotline and some other reporting mechanisms are available for use by agents, intermediaries, and their personnel
- Our company encourages or requires intermediary organizations to maintain a reporting hotline or other reporting mechanism
- Our company provides third parties with communications, training materials, and resources to help them comply with our contracts and Code of Conduct

Q5.10 Does your company conduct periodic audits of third parties to ensure compliance with ethical and legal standards?

- Yes, for high-risk third parties
- Yes, but only for certain risk areas
- No

Q5.11 Indicate how your company manages privacy and data security risks relating to third parties that store, process, transmit, or access information your company considers to be "highly critical" company information. Please select all that apply.

- Our company conducts due diligence into the third party's data security controls and procedures to protect our company's highly critical information before entering into a

contract

- Our company understands how and where (i.e., the geographic or jurisdictional location) the third party will store our company's highly critical information
- Our company requires contractual language regarding who will have access to our company's highly critical data
- Our company requires contractual language specific to procedures to ensure compliance with relevant data protection laws or regulations
- Our company requires contractual language regarding the process and procedure the third party will use to prevent, detect, and mitigate a breach of our company's highly critical data
- Our company requires contractual language requiring timely notification in the event of a data breach concerning our company's highly critical information
- Our company requires independent certifications of the data security controls of the third parties
- Our company conducts data security audits of third parties accessing, storing, or processing our company's highly critical information

Display Question 5.12:

If at least one answer is selected for Q5.11

Q5.12 Do the controls cited above in Question 5.11 apply to all third parties that access/process highly critical company information, including consultants and outside counsel?

- Yes, the controls apply to ALL third parties
- Yes, but controls apply to SOME, but not all, third parties
- No

Q5.13 Which of the following apply to how your company addresses any modern slavery risk presented by your third parties? For purposes of this question, modern slavery means slavery, servitude, forced or compulsory labor, and human trafficking. Please select all that apply.

- Our company maintains a communications program promoting a zero-tolerance policy prohibiting modern slavery and trafficking-related activities and the consequences should employees violate this prohibition

- Our company maintains a communications program that informs employees of the hotline phone number of the Global Human Trafficking hotline at 1-844-888-FREE and/or its e-mail address at help@befree.org
- Our company maintains a recruiting plan that permits only the use of recruiting companies with trained employees
- Our company maintains a recruiting plan or policy that prohibits charging employees recruitment fees
- Our company maintains a recruiting plan or policy that requires wages meet applicable host-country requirements or explains any variance
- Our company maintains a housing plan that meets the host country housing and safety standards, if necessary to provide or arrange employee housing
- Our company maintains a policy prohibiting agents and sub-contractors from engaging in modern slavery and requires that our company terminates any agents, sub-contractors or sub-contractor employees that have engaged in modern slavery-related activities
- Our company maintains a procedure that supports our policy preventing all agents and subcontractors from engaging in modern slavery and requires that our company terminates any agents, subcontractors, or subcontractor employees that have engaged in modern slavery-related activities
- Our company uses other, unique efforts to prevent modern slavery (Please specify) _____
- Our company or our supply chain has a limited, non-material exposure to human trafficking risk

Q5.14 Does your company communicate with any of its third parties regarding the company's sustainability and social responsibility performance and initiatives outside of contract terms and/or the Third Party Code?

- Yes, at least annually
- Yes, less often than annually
- No

Q5.15 What measures has your company taken in order to manage sustainability-related risks of your supply chain? Please select all that apply.

- Sustainability policy for suppliers
 - Sustainable purchasing policy
 - Lifecycle based purchasing program
 - Supplier sustainability questionnaire
 - Supplier sustainability audits by internal personnel
 - External audits for supply chain sustainability
 - Implemented projects to improve our supply chain sustainability management system
 - Integrated compliance and supply chain performance metrics in our company
 - Other (Please specify)
-

Q5.16 Does your company require its third parties to have a formal sustainability or social responsibility policy or program?

	All third parties are required to have a formal policy or program on this topic	Only certain third parties are required to have a formal policy or program on this topic	Our company doesn't require suppliers to have a formal policy or program
Sustainability policy or program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social responsibility policy or program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q5.17 Does your company formally audit the sustainability or social responsibility policy or program of any of your third parties?

- Yes
- No



Q5.18 Does your company provide assistance (e.g., by sharing company practices, paying for external assistance, etc.) to third parties to support them in developing or maintaining a formal sustainability or social responsibility program?

Yes (Please explain the scope and type of assistance provided)

No

Q5.19 Please provide us with any further details that would allow us to understand your efforts to select third parties that share your values. Please limit your response to no more than 1,000 characters.

End of Section 5: Third Party Management



Section 6: Citizenship, Sustainability, and Corporate Responsibility

This section reviews a wide range of your company's performance indicators associated with sustainability, citizenship, and social responsibility, including:

- Environmental stewardship
- Community involvement
- Corporate philanthropy
- Workplace impact and well-being
- Supply chain engagement and oversight

The quality and effectiveness of the initiatives are considered, in addition to stated and measurable goals, accountability, and transparency. In concert with the governance section, this section is used to evaluate environmental, social, and governance (ESG) criteria.

Please note that the term "sustainability" as used in this section means environmental sustainability and the term "social responsibility" means community involvement and impact, philanthropy, and workplace impact and well-being.

Q6.1 Does your company conduct sustainability- and/or social responsibility-related initiatives?

- Yes
- No

Skip To: Q6.15 If Q6.1 = No

Q6.2 What is the highest full-time role responsible for sustainability and social responsibility at your company?

	Senior Executive, Vice President, or functional head	Chief Sustainability Officer	Chief Ethics & Compliance Officer	Director (mid-level management) or manager (frontline management)	Other	No single individual
Role responsible for sustainability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Role responsible for social responsibility	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q6.3 How often does the Board, a Board committee, or other governing authority receive formal briefings on initiatives and projects related to sustainability and social responsibility?

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing such briefings to the Board, a Board committee, or other governing authority.

	At least monthly	Quarterly	Semi-annually	Annually	Every one to two years	Rarely or never
Sustainability-related communications or briefings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social responsibility-related communications or briefings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q6.4 How often do senior executives (e.g., CEO and other C-suite members) receive formal briefings regarding sustainability and social responsibility initiatives and performance?

	At least monthly	Quarterly	Semi-annually	Annually	Every one to two years	Rarely or never
Sustainability-related communications or briefings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social responsibility-related communications or briefings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q6.5 Select which types of communication involving senior executives (e.g., CEO and other C-suite members) are used within your company to discuss sustainability and/or social responsibility initiatives. Please select all that apply.

	Sustainability-related communications involving senior executives	Social responsibility-related communications involving senior executives
Emails to the workforce	<input type="checkbox"/>	<input type="checkbox"/>
Onboarding video	<input type="checkbox"/>	<input type="checkbox"/>
Intranet site video	<input type="checkbox"/>	<input type="checkbox"/>
Podcast	<input type="checkbox"/>	<input type="checkbox"/>
Town hall, annual kick-off, or other company-wide meetings led by senior leadership	<input type="checkbox"/>	<input type="checkbox"/>
Internal meetings involving senior leadership	<input type="checkbox"/>	<input type="checkbox"/>
Interactive Q&A forum or chat functionality	<input type="checkbox"/>	<input type="checkbox"/>
Sustainability and social responsibility blog by member(s) of senior leadership	<input type="checkbox"/>	<input type="checkbox"/>
Newsletter	<input type="checkbox"/>	<input type="checkbox"/>
Sustainability report	<input type="checkbox"/>	<input type="checkbox"/>
Other types of communication (Please specify)	<input type="checkbox"/>	<input type="checkbox"/>

Q6.6 Select which types of communication managers and other non-executive leaders (i.e., excluding senior executives) use within your company to discuss sustainability and/or social responsibility initiatives. Please select all that apply.

	Sustainability-related	Social responsibility-related
--	------------------------	-------------------------------

	communications involving managers and other non-executive leaders	communications involving managers and other non-executive leaders
Emails to the workforce	<input type="checkbox"/>	<input type="checkbox"/>
Onboarding video	<input type="checkbox"/>	<input type="checkbox"/>
Intranet site video	<input type="checkbox"/>	<input type="checkbox"/>
Podcast	<input type="checkbox"/>	<input type="checkbox"/>
Town hall, annual kick-off, or other company-wide meetings that involve members of the workforce	<input type="checkbox"/>	<input type="checkbox"/>
Internal meetings	<input type="checkbox"/>	<input type="checkbox"/>
Interactive Q&A forum or chat functionality	<input type="checkbox"/>	<input type="checkbox"/>
Sustainability and social responsibility blog by member(s) of the workforce	<input type="checkbox"/>	<input type="checkbox"/>
Newsletter	<input type="checkbox"/>	<input type="checkbox"/>
Sustainability report	<input type="checkbox"/>	<input type="checkbox"/>
Other types of communication (Please specify)	<input type="checkbox"/>	<input type="checkbox"/>

Q6.7 Please describe any process your organization uses to engage external stakeholders regarding sustainability or social responsibility performance and initiatives, particularly any process used to gather their feedback on the company's strategy in either area. Please limit your response to 1,000 characters.

Q6.8 Does your company assess or measure the effectiveness or impact of its sustainability and/or social responsibility initiatives?

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing how your company assesses or measures such effectiveness.

- Yes
- No

Skip To: Q6.11 If Q6.8 = No

Q6.9 Who is involved in the assessment process to measure the impact of sustainability and/or social responsibility initiatives? Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing how the individuals selected are involved in the assessment process.

- C-suite officers
- Senior-level executives
- Director-level employees
- Managers of people
- Individual contributors
- External consultants
- Other (Please specify)
-

Q6.10 How often does your company assess or measure the effectiveness or impact of its sustainability and/or social responsibility initiatives?

- At least quarterly

- Twice a year
- Annually
- Every two years
- Every three years
- Every four or more years

Q6.11 Does your company produce a report regarding its corporate citizenship, responsibility, and sustainability? Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide a copy of the report indicated.

- No
- Yes, we produce a standalone Corporate Citizenship, Responsibility, and Sustainability Report ("CSR Report")
- Yes, we produce a standalone CSR Report and make it publicly available
- Yes, we include such reporting as part of our annual report rather than as a standalone CSR report
- Yes, we maintain an interactive website that summarizes our CSR initiatives
- Yes, we include information regarding our CSR initiatives on our website, but not on an interactive website dedicated to such initiatives
- Yes, and our reporting adheres to GRI Sustainability Reporting Guidelines
- Yes, and our reporting adheres to a set of standard reporting guidelines other than GRI (Please specify the reporting standard in the space provided)

- Yes, but we do not report on CSR initiatives in a modality listed above; rather, our reporting is contained in a unique report (Please provide the title of the report in the space provided) _____

Skip To: Q6.15 If Q6.11 = No

Q6.12 You indicated that your organization produces a report on its corporate citizenship, responsibility, and sustainability efforts. How often is this report produced?

- Every four or more years
- Every three years
- Every two years
- Annually

Q6.13 Please specify the year in which your company's first CSR Report or other report regarding your company's CSR initiatives was produced.

Q6.14 Was your company's most recent report regarding CSR initiatives assured or audited?

- No, we do not audit or pursue assurance of our CSR Report
- Yes, we self-audit our entire CSR Report
- Yes, our entire CSR Report is assured or audited independently (please specify the organization providing assurance or conducting the audit)

- Yes, part of our CSR Report (e.g., only environmental sustainability data) is self-audited
- Yes, part of our CSR Report (e.g., environmental sustainability data) is assured or audited independently (please specify the organization providing assurance or conducting the audit) _____

Q6.15 Which of the following methods, if any, does your company use to quantitatively assess or measure its environmental performance? Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing the methods selected.

- Greenhouse gas (GHG) emission data
- Triple Bottom Line (TBL) accounting
- Life-cycle assessments
- ISO 14000 standards



- 5 Level Framework (5LF)
 - Sustainability Management System (SMS)
 - ESG assessment
 - Other type of environmental performance measurement (Please specify)
-
- Our company does not quantitatively assess environmental performance

Q6.16 Has your organization integrated corporate citizenship, responsibility, and sustainability programs/initiatives into its overall enterprise risk management (ERM) strategy?

- Yes
- No

*Display Question 6.17:
If Q6.16 = Yes*

Q6.17 Please describe how your organization is integrating corporate citizenship, responsibility, and sustainability programs/initiatives into its overall enterprise risk management (ERM) strategy. Please limit your response to 1,000 characters.

Q6.18 Has your company been a founding member of any significant industry, national, or international initiative related to corporate citizenship, responsibility, and sustainability?

- Yes (Please specify which initiatives)
-
- No
 - Not sure

Q6.19 What are your organization's key sustainability accomplishments over the previous 12 months? Please limit your response to 1,000 characters.

Q6.20 Is your company aligned with an internationally accepted definition of human rights (e.g., adhering to the United Nations' Guiding Principles on Business and Human Rights)?

- Yes
- No
- Not sure
-

Q6.21 Which of the following programs are included among your company's workforce-related programs/initiatives? Please select all that apply.

- Adoption or fertility assistance programs
- Affirmative action plan
- Carpooling support programs
- Childcare facilities
- Choice of health, vision, and dental insurance
- Contributory pension scheme, such as a 401(k)
- Diversity program
- Employee assistance programs
- Employee recognition programs
- Flex scheduling
- Gym facilities or gym fee reimbursement programs
- Higher education scholarship programs, for either employees or their relatives

- Matching gift program
 - Maternity and paternity leave programs
 - Mentoring programs
 - Paid time off for employee volunteers
 - Preventative healthcare programs
 - Public transportation subsidy
 - Sabbatical
 - Telecommuting options
 - Tuition reimbursement (other than career training)
 - Physical wellness programs
 - Mental health wellness programs
 - Workforce training, skills, and leadership development programs
 - Availability of ESG-oriented funds for selection in the company's 401(k) plan
 - Other unique initiatives (Please specify)
-

Display Question 6.22:

If Q6.21 = Mental health wellness programs

Q6.22 You indicated that mental health wellness programs are included among your company's workforce-related programs/initiatives.

Please explain what efforts your company undertakes, if any, to support employees' mental health beyond the basic employee assistance plan. Include a description of program outcomes and key metrics tracked, if available. Please limit your response to 1,000 characters.



Q6.23 Does your company have a formal community involvement strategy?

- Yes, it is largely developed independently of overall corporate strategy
- Yes, it is aligned with the overall corporate strategy
- No, our company does not currently have a formal community involvement strategy

Q6.24 Please list any industry-specific, local, national, or international initiatives your company is currently participating in or is a member of that relate to governance, ethics and compliance, culture, sustainability, citizenship, and/or social responsibility. Examples include the UN Global Compact (<https://www.unglobalcompact.org>), the Carbon Disclosure Project (<https://www.cdp.net/>), and Transparency International (<https://www.transparency.org/>).

If you think it would be helpful for Ethisphere to understand the significance or relevance of any of these initiatives (i.e., the title is not self-explanatory), or if your participation goes beyond sponsorship and general attendance, please explain.

Please limit your response to 2,000 characters.

Q6.25 With regards to community involvement, indicate which of the following apply to your company. Please select all that apply.

Supporting Documentation Request: if available, as part of your supporting application materials, please provide documentation evidencing your company's community involvement efforts.

- We set specific goals for community involvement
- We use key performance indicators (KPIs) to measure progress towards community involvement goals
- We evaluate business decisions in the context of societal impact



Q6.26 In what ways does your company encourage employees to support and add value in local communities? Please select all that apply.

- Matching employee charitable donations
- Paid time off for employee volunteer efforts
- Encouraging or requiring employees to serve on the boards of charitable organizations
- Facilitating donation drives (e.g., clothing, food, etc.)
- Other unique or innovative ways (Please specify)

Q6.27 Please provide any additional commentary pertaining to your company's CSR or sustainability programs you believe supports your questionnaire answers. Please limit your response to 500 characters.

End of Section 6: Citizenship, Sustainability, and Corporate Responsibility



Section 7: Leadership and Reputation

Leadership and Reputation measures a company’s participation in advancing governance, ethics and compliance, and sustainability practices, its legal compliance, litigation and ethical track record, and the strength of the company’s ethical reputation in the market place.

While we consider awards and accolades garnered, we also look at some concrete examples of corporate leadership in local, national, industry, and/or global initiatives that promote business ethics, responsible and sustainable business practices, environmental stewardship, good governance, transparency, and social responsibility.

Q7.1 Please explain what accolades, honors, awards, or recognitions your company has received during 2017, 2018, or 2019 that relate specifically to your organization's governance, ethics and compliance, culture, sustainability, citizenship, or social responsibility. Please do not include recognitions or honors pertaining solely to excellence in your company’s industry unless they relate to governance, ethics and compliance, culture, sustainability, citizenship, or social responsibility. If you think it would be helpful for Ethisphere to understand the significance or relevance of any of the accolades or honors listed, please explain in the space provided or as part of your supporting documentation. Please limit your response to 2,000 characters.

Supporting Documentation Request: if available, as part of your supporting application materials, please submit documents providing context for the significance of the accolades, honors, or awards listed.

Q7.2 Please provide any information regarding (i) ways in which your company measures its reputation and (ii) the results of such measurement. Please describe in the space provided and limit your response to 1,000 characters.

Supporting Documentation Request: if available, as part of your supporting application materials, please submit documents showing efforts made by your company to measure its reputation.

Q7.3 As part of the evaluation process, Ethisphere conducts adverse media reviews. If there is a significant issue Ethisphere will find as part of this evaluation, please provide any details you would like to present on that issue. Please limit your response to 2,000 characters.

Supporting Documentation Request: if available, as part of your supporting application materials, please submit documentation to support your company's explanation.

Q7.4 Is your company currently included on any the following indices? Please select all that apply.

- CDP Climate Performance Leadership Index and/or CDP Climate Disclosure Leadership Index
- Financial Times Stock Exchange for Good FTSE4Good Index
- Dow Jones Sustainability Indices
- Maplecroft Climate Innovation Index
- STOXX Global ESG Leaders Index
- Human Rights Campaign Corporate Equality Index
- MSCI ESG Indexes
- Other indices related to ESG or sustainable investing (Please specify)

Q7.5 Please list any organizations of which your company (or any employees or directors) is a founding member and/or an actively participating member (e.g., attending events, involvement in initiatives) that furthers issues relating to governance, ethics and compliance, culture, sustainability, citizenship, and/or social responsibility.

If you think it would be helpful for Ethisphere to understand the significance or relevance of any of the groups or organizations in furthering these topics (i.e., the title is not self-explanatory), or if your participation goes beyond membership and general attendance (e.g., founding member or particularly engaged), please explain.

The purpose of this question is for Ethisphere to be able to understand how your company is involved in groups addressing these issues within industry and society.

Please limit your response to 2,000 characters.

Q7.6 How are senior executives (i.e., C-suite leadership) furthering the dialog of ethics and integrity within your industry? Please be specific, do not generally explain that the executives speak at a lot of conferences. Please limit your response to no more than 1,000 characters.

Q7.7 How are senior executives (i.e., C-suite leadership) furthering the dialog of ethics and integrity outside of your industry? Please be specific; do not generally explain that the executives speak at a lot of conferences. Please limit your response to no more than 1,000 characters.

Q7.8 In the past five years, which of the following (if any) apply to your company (including any subsidiaries or joint ventures) or any members of senior leadership? Please select all that apply.

Defendant in a securities fraud class action lawsuit that was not finally adjudicated in the company's favor. Such adjudication does NOT include voluntary dismissal pursuant to a settlement agreement.

Defendant in an antitrust lawsuit that was not finally adjudicated in the company's favor. Such adjudication does NOT include voluntary dismissal pursuant to a settlement agreement.

Defendant in a serious civil action (e.g., tort) related to business activities other than a securities class action lawsuit or antitrust lawsuit that was not finally adjudicated in the company's favor. Such adjudication does NOT include voluntary dismissal pursuant to a settlement agreement.

- Defendant in a lawsuit alleging retaliation against a whistleblower that was not finally adjudicated in the company's favor. Such adjudication does NOT include voluntary dismissal pursuant to a settlement agreement.
- Defendant in a qui tam action which was not finally adjudicated in the company's favor. Such adjudication does NOT include voluntary dismissal pursuant to a settlement agreement.
- Subject to a government investigation that was closed through a declination letter
- Subject to a government investigation that was closed without action against the company but not through a declination letter
- Achieved a settlement as a defendant or target of a government investigation with or without admission of liability
- Subject to a deferred prosecution or non-prosecution agreement
- Subject to a corporate integrity agreement
- Required to have a compliance monitor
- Indicted
- Debarred
- Paid material fines and/or penalties related to a compliance failure
- Dismissed executive(s) or received resignations from executive(s) due to actual (or alleged) misconduct
- Publicly disclosed a data breach that affected at least 1,000 employees, customers, or other stakeholders
- None of the above

Q7.9 Please provide additional details regarding the situation, outcome, and any impacts on your company as a result of the incident(s) indicated in the previous question. Please limit your response to 2,000 characters.

Q7.10 Provide any additional commentary as it pertains to your company's position as a leader in developing ethical business practices or new or innovative ethics-related initiatives, or that demonstrates your company's positive ethical reputation. Please limit your response to 1,000 characters.

End of Section 7: Leadership and Reputation

Section 8: Conclusion

Thank you for participating in the Ethisphere Institute's 2020 Ethics Quotient Survey and World's Most Ethical Company selection process.

If you have any questions or concerns about the survey or application process, please email wmeapplications@ethisphere.com

This concludes the questionnaire.

End of Section 8: Conclusion
