



## Current Global Integrity Challenges and Impacts of the COVID-19 Pandemic on Corporate Compliance and Fight Against Corruption

September 23, 2020









#### Established in May 2010

Highest ethical values in business world, integrity, transparency, accountability, compliance programs

A referance center

TEİD membership base: +150 corporate members and individual members %15 of Turkish GDP

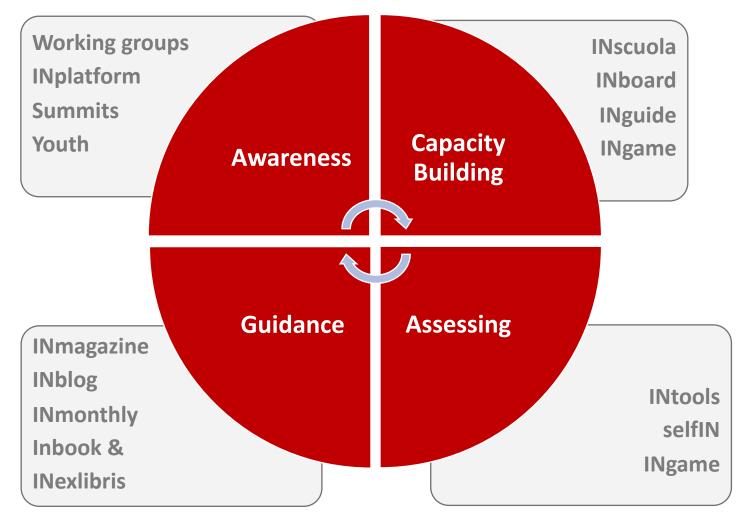
250.000+ Employees







#### **Business Ethics To Be The Key Stone, Levelling The Playing Field...**









#### TEID Is A Member of;

Slobethics.net







**B20** Anti-Corruption Network

**B20 Turkey** 

TRACE International,

Global Ethics Network,

**European Business Ethics Network** 

**Basel Institute on Governance** 

**OECD Anti-Corruption Working Group** 



#### **Turkish Integrity Center of Excellence**



**Private Sector Collective Action Center** 







#### Frank Brown

Director, Anti-Corruption & Governance Center Center for International Private Enterprise (CIPE)

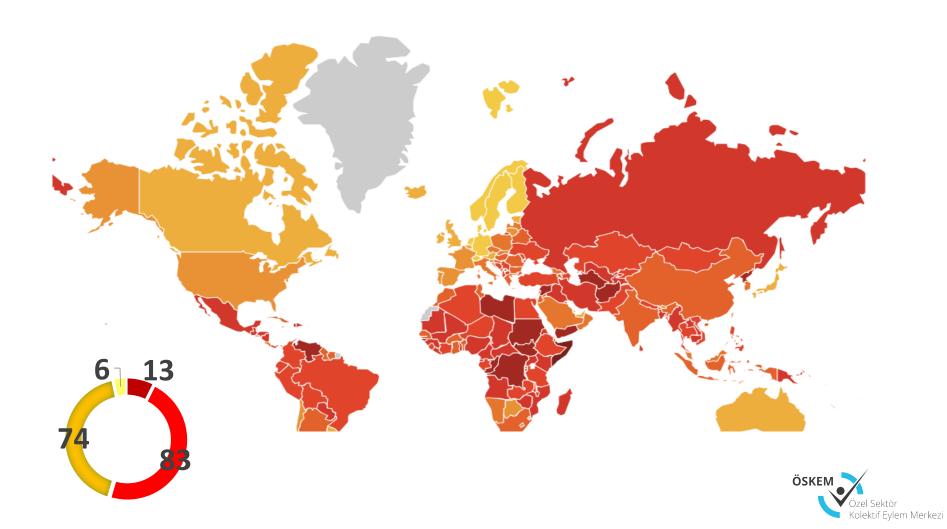
Affiliated with the U.S. Chamber of Commerce







# **Corruption Perceptions Index 2019**





# **Top 20 Countries**



#	Country	Region	2019
1	New Zealand	AP	87
1	Denmark	WE/EU	87
3	Finland	WE/EU	86
4	Switzerland	WE/EU	85
4	Sweden	WE/EU	85
4	Singapore	AP	85
7	Norway	WE/EU	84
8	Netherlands	WE/EU	82
9	Luxembourg	WE/EU	80
9	Germany	WE/EU	80
11	Iceland	WE/EU	78
12	United Kingdom	WE/EU	77
12	Canada	AME	77
12	Austria	WE/EU	77
12	Australia	AP	77
16	Hong Kong	AP	76
17	Belgium	WE/EU	75
18	Ireland	WE/EU	74
18	Estonia	WE/EU	74
20	Japan	AP	73







### **Last 4 Years Of Top 20 Countries**

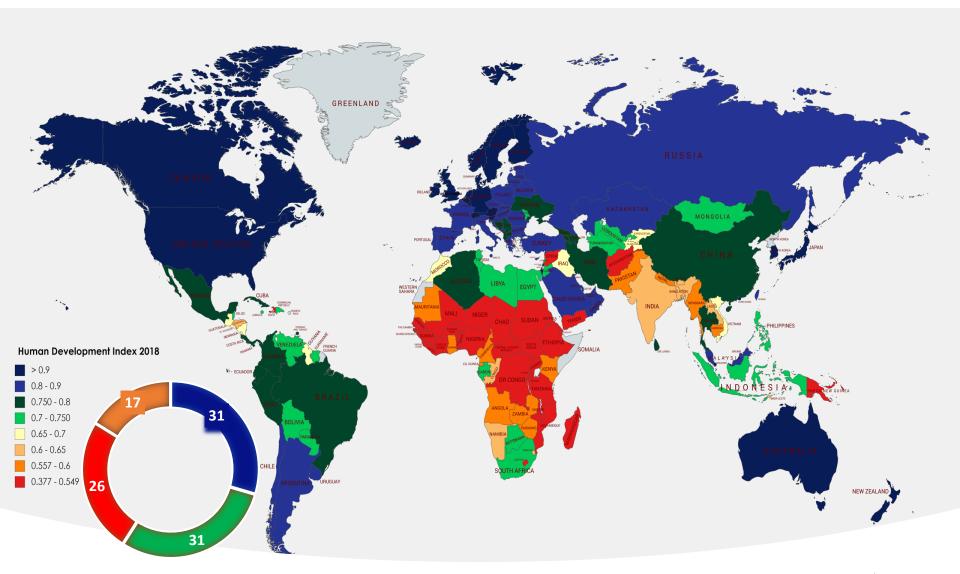
### Corruption Perceptions Index 2019

Country	ISO3	Region	CPI score 2019	Rank 2019	Sources 2019	Standard error 2019	CPI score 2018	Rank 2018	Sources 2018	Standard error 2018	CPI score 2017	Rank 2017	Sources 2017	Standard error 2017	CPI score 2016	Sources 2016	Standard error 2016
New Zealand	NZL	AP	87	1	8	2,29	87	2	8	2,44	89	1	8	2,4	90	7	2,56
Denmark	DNK	WE/EU	87	1	8	2,54	88	1	8	2,63	88	2	8	2,75	90	7	2,46
Finland	FIN	WE/EU	86	3	8	2,92	85	3	8	2,74	85	3	8	2,84	89	7	1,46
Switzerland	CHE	WE/EU	85	4	7	1,58	85	3	7	1,57	85	3	7	1,71	86	6	1,57
Singapore	SGP	AP	85	4	9	2,05	85	3	9	1,98	84	6	9	2,26	84	8	2,35
Sweden	SWE	WE/EU	85	4	8	1,98	85	3	8	2,02	84	6	8	2,27	88	7	1,33
Norway	NOR	WE/EU	84	7	7	1,65	84	7	8	2,14	85	3	8	1,83	85	7	1,85
Netherlands	NLD	WE/EU	82	8	8	2,25	82	8	8	2,3	82	8	8	2,23	83	7	2,32
Luxembourg	LUX	WE/EU	80	9	7	1,95	81	9	7	2,32	82	8	6	2,08	81	6	1,96
Germany	DEU	WE/EU	80	9	8	3,31	80	11	8	2,49	81	12	8	1,87	81	7	2,73
Iceland	ISL	WE/EU	78	11	7	4,63	76	14	7	4,33	77	13	7	4,38	78	6	3,81
Canada	CAN	AME	77	12	8	2,80	81	9	8	2,16	82	8	8	1,49	82	7	2,03
United Kingdom	GBR	WE/EU	77	12	8	3,34	80	11	8	2,03	82	8	8	1,7	81	7	2,12
Australia	AUS	AP	77	12	9	1,32	77	13	9	1,27	77	13	9	1,4	79	8	1,27
Austria	AUT	WE/EU	77	12	8	1,57	76	14	8	1,37	75	16	8	1,17	75	7	1,36
Hong Kong	HKG	AP	76	16	8	3,15	76	14	8	2,47	77	13	7	2,37	77	7	2,62
Belgium	BEL	WE/EU	75	17	7	1,09	75	17	8	1,09	75	16	8	1,63	77	7	1,55
Ireland	IRL	WE/EU	74	18	7	3,61	73	18	7	3,25	74	19	7	3,68	73	6	4,31
Estonia	EST	WE/EU	74	18	10	1,21	73	18	10	1,44	71	21	10	2,21	70	10	2,16
Japan	JPN	AP	73	20	9	3,51	73	18	9	2,85	73	20	9	2,66	72	8	3,02















- Foundations of rule of law are essential
  - Strength of institutions like the judiciary must be maintained
  - Companies should retain their independence to operate









# **How Reputation Moves Markets**

An analysis of data in the US by Reputation Institute, reveals how corporate reputation increases share price value.

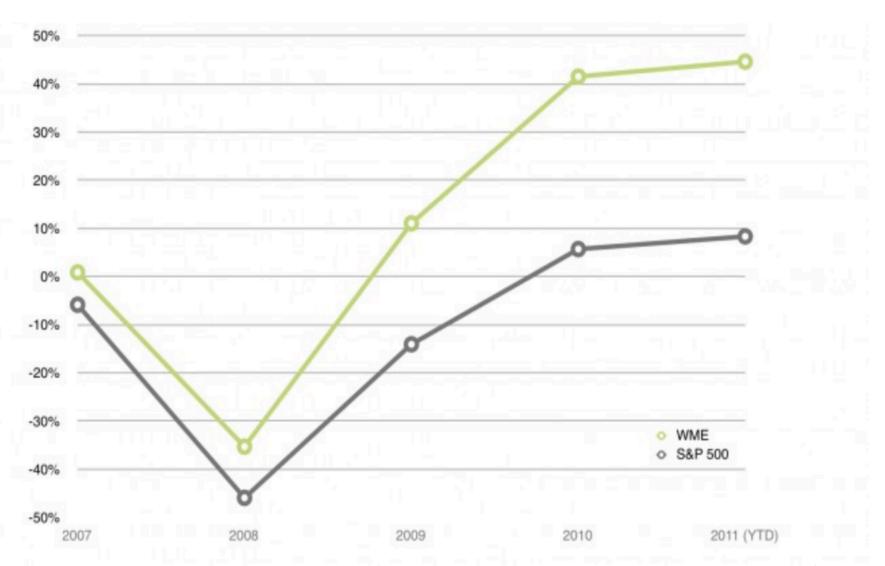


In comparing
the RepTrak\*
portfolio of
companies to
the S&P 500
Index, the
most reputable
companies
OUTPERFORM
the financial
market.















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#### Key findings



Demonstrating					
integrity					
Doing the right					

Doing the right thing is about more than avoiding financial penalties.

E	30/
30	<b>)</b> %

Strengthening reputations



Attracting new customers



Helping retain talent

#### COVID-19

Aside from worsening market conditions, respondents believe the top COVID-19 risks to ethical conduct are:



Disruption to traditional working patterns, e.g. increase in remote working



Disruption to supply chains



Reduction in employee benefits and compensation



Reduction in staff levels

#### Personal conduct

Junior employees\* don't always trust the integrity of their leaders.



of junior employees are not entirely confident that management abides by the relevant laws, codes of conduct and industry regulations.



of board members are very confident that they play by the rules.

#### Third-party conduct

Senior leaders are prepared to ignore third-party misconduct.



of all respondents would be prepared to ignore unethical conduct by third parties in order to boost their career or pay.



The figure rises to 20% among board members.

#### **Data integrity**

Organizations are overconfident on data protection.

of those surveyed said they are fairly or very confident that their organization is doing everything needed to protect the privacy of customer data.

don't train employees on applicable data privacy regulations, such as the General Data Protection Regulation (GDPR).

<sup>\*</sup>For the purposes of this report, junior employees are defined as those who categorized themselves as 'other employees.'



### Covid-19: Compliance at Risk

• Concern that anti-corruption compliance will drop as a priority

 Companies are struggling to survive and desperate to maintain revenue flow

 Concern that enforcement will drop as governments seek help business flourish unimpeded







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- With heightened competition between companies, an important selling point is for a company to have a strong ethics and compliance program;
- Concern that massive monetary outlays and suspension of ordinary procurement rules will result in greater corruption related to government procurement





# At Large: How chief compliance officers became today's 'super executives'

Richard L. Cassin September 10, 2020 7:58 am

The DOJ released the first version of its Evaluation of Corporate Compliance Programs in 2017. That document (with its 2019 and 2020 updates) completed the chief



compliance officer's amazing transformation from part-time generalist to today's highly specialized "super executive." How did it happen, and why?

A bit of background. The U.S. Sentencing Commission arguably created the modern compliance function with the 1991 release of the Organizational Guidelines. The DOJ's Evaluation of Corporate Compliance Programs paid homage to the Organizational Guidelines. But the DOJ's document "personalized" compliance in the new way that started after 9/11, and it elevated the CCO to a special level within the C-suite.

Here's what I mean.

The Organizational Guidelines famously set out the elements of an "effective compliance program." One of those elements required companies to place responsibility for the compliance function on "high-level personnel of the organization." The U.S. Sentencing

#### The FCPA Blog

