

Ethical Business Practice: Values-based Ethics and Compliance Framework*

1. A written code of Ethical Business Practice, developed from within, based upon the organisation's values and aligned with the culture, forming the cornerstone of the organisation's approach to ethics and compliance.
2. Regular ethical/anti-corruption risk assessments, done by the business, with expert support as necessary and the implementation of mitigation measures in response to the risks identified.
3. Clear, succinct policies and procedures that are easily accessible and kept updated.
4. Regular pattern of communications at all levels of management, including regarding demonstrable behaviour in line with ethical principles, publicised sensitively.
5. Training aimed at informing those doing business on behalf of the organisation as to what is expected of them, mainly conducted face-to-face and supplemented by training delivered online or by other technological means, such as apps.
6. A network of employee ethics ambassadors to assist in embedding ethical values and to help with communications and training.
7. Development of ethical decision-making skills, including how to recognise and resolve ethical dilemmas and how to effectively implement solutions once they have been determined. This would include ethical decision-making models and scenario-based training using realistic scenarios developed internally (scenario bank).
8. Adequate resources, including people to develop and deliver the necessary materials for training and awareness raising, to carry out proper investigations of ethical lapses and to capture and communicate lessons learned.
9. Effective due diligence of third parties, conducted by the business, with support as necessary.
10. Involvement of relevant third parties and strategic partners in the commitment to ethical business practice, including the supply chain and anyone acting on behalf of the organisation.
11. An appropriate mechanism for speaking up, catering to the language and cultural characteristics of the organisation, supported by a skilled approach to investigations and discipline, as well as a climate of 'psychological safety' in which to do so.
12. Monitoring, measuring, tracking and reporting elements of ethical business practice by various means.

* From, *Ethical Business Practice and Regulation: A Behavioural and Values-based Approach to Compliance and Enforcement* by Hodges and Steinholtz Bloomsbury Professional Publishing December 2017