

The Ethisphere Institute

2017 Ethics Quotient[®] Questionnaire

Part 1: Introduction

Thank you for electing to participate in the Ethisphere[®] Institute's 2017 Ethics Quotient[®] (EQ¹) Survey and *World's Most Ethical Companies*[®] (WME) evaluation process.

How to Complete Your 2017 World's Most Ethical Companies Application

Participation in the WME evaluation process consists of three steps. First, candidates must complete this Survey. Second, candidates are strongly encouraged to submit documentation to corroborate the survey answers and support their applications. As discussed in more detail in information linked to below, a crucial component of the evaluation process is Ethisphere's verification of a candidate's program through review of supplemental documentation. Third, candidates are required to 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: <http://worldsmoethicalcompanies.ethisphere.com/wp-content/uploads/application-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: <http://worldsmoethicalcompanies.ethisphere.com/scoring-methodology/>

Survey Completion Instructions

This Survey should be completed by authorized individual(s) with a working knowledge of their 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, please choose the answer 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, please note that some questions may not apply to your particular company. If there are certain questions for which you feel the answer options provided are inadequate to reflect your company's program, please

¹ "Ethisphere", "World's Most Ethical Companies" and "Ethics Quotient" are registered trademarks of Ethisphere, LLC.

include follow up information in the open-ended comments/feedback section at the end of each section in the survey or with the submission of 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

How to Use This PDF

This PDF is designed to allow you to efficiently prepare responses and collect any needed information from other stakeholders within the company before completing the online survey. It is strongly recommended that you prepare answers to each question using this PDF copy of the Survey in advance of completing the online survey. Doing so will expedite the online process.

Furthermore, this PDF document provides additional context that will not appear when interacting with the online survey. Please note the following text highlights and what they represent:

Text provided in a blue highlight signifies skip logic that may, depending upon how a particular question is answered, affect the appearance of that question or subsequent questions in the manner described. This means that not all questions contained in the PDF will be included in the online survey presented to your company.

Text provided in an orange highlight identifies questions that are new or have been revised for the 2017 EQ Survey

Text provided in a gray highlight describes the unique answer type required for a given question, such as open-ended text or numeric entry

A Microsoft Word version of the 2017 EQ Survey is available upon request.

Terms and Conditions

Types of Eligible Companies

Except as explained herein, any company, public or private, for-profit or not-for-profit, U.S. or based outside of the U.S., 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 has evolved, Ethisphere has come to the conclusion that it cannot sufficiently evaluate non-profit colleges and universities, governments, governmental agencies, and NGOs. Therefore, beginning with the 2017 process, organizations in these categories will not be considered for the World's Most Ethical Company honor.**

We encourage wide participation regardless of whether a company thinks that it will be honored. All companies that respond to the survey will receive an analysis that provides their overall Ethics Quotient and how their responses in each of the five categories and to key questions compare to those that are eventually named as honorees. The value in participating is in learning not only how your company compares to the honorees, but in better understanding what's trending in leading companies and more about their best practices.

Privacy and Confidentiality

In the process of completing the EQ Survey and providing supporting documentation and explanation, a World's Most Ethical Company 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: (i) to process the nominee's submission, including generating scores; (ii) to provide a scorecard and other analysis to the nominee; (iii) to determine whether the nominee will be designated a WME company; (iv) for any additional analysis or discussion the company may wish to have with Ethisphere; and (v) 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, e.g., portable hard drives, will not be returned to the nominee but will be destroyed. Names of companies are not released and remain confidential except for the names of those actually selected as World's Most Ethical Companies.

To the extent the nominee submits any personal information of its employees or others in completing the EQ questionnaire or otherwise participating in the WME selection process, Ethisphere will only use such personal information to process or follow up on the nominee's submission including to contact the

nominee regarding the WME process, any related topics or to discuss or provide Ethisphere services, events, or products.

2017 WME Logo

By participating in the WME selection process, nominee understands and agrees that if it should be selected to Ethisphere’s 2017 World’s Most Ethical Companies list, while nominee may use text to announce and publicize the honor, it must follow Ethisphere’s published Branding and Logo Usage Guidelines, and that any use of Ethisphere’s 2017 WME logo or the term “World’s Most Ethical Company” will be governed by Ethisphere Logo Use and Branding Guidelines and related terms and license fees. Honorees may not design their own logo nor depart from the Branding and Logo Use Guidelines.



Part 2: Corporate Demographics

2.1 Please provide your contact information and the complete and formal name of the company for which you are completing this survey:

- Company name:
- Your first name:
- Your last name:
- Your title or role:
- Your email address:
- Mailing address 1:
- Mailing address 2:
- City:
- State:
- Zip/Postal code:
- Country:
- Phone (Please include country code preceded by a + sign if located outside of the United States):

2.2 Please provide contact information for a person 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:
- Role or title:
- Email address:
- Mailing address 1:
- Mailing address 2:
- City:
- State:
- Zip/Postal code:
- Country:
- Phone (Please include country code preceded by a + sign if located outside of the United States):

2.3 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 Logic: If "No" Is Selected for question 2.3, the respondent will exit the questionnaire

2.4 Please select which type of organization you represent:

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

2.5 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 (e.g., 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"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information Technology	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>

Question 2.5 has been updated for 2017 to include new industry selections

2.6 Please select the regions in which your company has operations or transacts business:

	Location of Headquarters	Region with Operations	Region where Business is Transacted (e.g., sales, suppliers, partnerships)
Africa	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Australia/New Zealand/Pacific Islands	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Canada	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Central America and Caribbean	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Central/Eastern Europe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India/Pakistan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Japan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Middle East	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Russia/CIS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South America	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Southeast Asia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
United States of America	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Western Europe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 2.6 has been updated for 2017 to include "Location of Headquarters" option

2.7 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

2.8 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

Question 2.8 has been updated for 2017 to include new revenue ranges

2.9 Approximately what percentage of its annual revenue does your company derive from business with the United States federal government?

- 0 percent
- 1-25 percent
- 26-50 percent
- 51-75 percent
- 75-100 percent

Question 2.9 is new for 2017

Part 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.

For purposes of this survey, the term “director(s)” shall refer to member(s) of your company’s governing authority, if different than a Board.

3.1 What type of governing authority does your company have in place? Please note: any reference to “other governing authority” throughout this questionnaire applies ONLY to companies that do not have a Board.

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

Question 3.1 has been updated for 2017 to include new answer options

Skip Logic: If “My company does not have a governing authority” is selected for question 3.1, the respondent will be directed to question 3.30

Skip Logic: If “Partnership/Owners/Members (and no other formal governing authority)” is selected for question 3.1, the respondent will be directed to question 3.15

3.2 How many directors on your company’s Board are independent (i.e., the director has no material relationship with the company other than as a director)?

Question 3.2 has been updated for 2017

This question requires a numeric response

3.3 Does your company’s Board hold annual elections for all directors?

- Yes
- No

3.4 Which of the following describes your company’s Board attendance during the prior two-year period?

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

3.5 How often do one or more of your company’s independent directors meet with your company’s various stakeholders?

	Quarterly	Three times per year	Two times per year	Annually	Ad hoc	Never	Not applicable
Institutional investors	<input type="checkbox"/>						
Retail shareholders (or other active shareholders)	<input type="checkbox"/>						
Market analysts	<input type="checkbox"/>						
Priority organizational clients or third parties (such as key suppliers, joint venture partners)	<input type="checkbox"/>						
Regulators	<input type="checkbox"/>						

Question 3.5 has been updated for 2017 to clarify the question

3.6 Does your company require conflict of interest certifications and/or disclosures (separate from a Code of Business Conduct acknowledgement) from independent directors?

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

Question 3.6 is new for 2017

Skip Logic: Question 3.6 will only be presented if the answer to question 3.2 is a number greater than zero.

3.7 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"/>					
Committees of the Board	<input type="checkbox"/>					
Individual Directors	<input type="checkbox"/>					

3.8 Please select the following that best describes the process for conducting performance evaluations for the entire Board.

- The performance review is conducted internally with no external assistance
- The performance review is conducted internally using an outside resource or tool (e.g., an online survey tool)
- The performance review is conducted by a consulting firm (or other third-party external to the company)
- A performance review is not currently conducted

Question 3.8 has been updated for 2017

Skip Logic: If “We do not conduct evaluations” is selected for “Full Board” in question 3.7, the respondent will not be presented question 3.8

3.9 Please select the following that best describes the process for conducting performance evaluations for committees of the Board.

- The performance review is conducted internally with no external assistance
- The performance review is conducted internally using an outside resource or tool (e.g., an online survey tool)
- The performance review is conducted by a consulting firm (or other third-party external to the company)
- A performance review is not currently conducted

Question 3.9 has been updated for 2017

Skip Logic: If “We do not conduct evaluations” is selected for “Committees of the Board” in question 3.7, the respondent will not be presented question 3.9

3.10 Please select the following that best describes the process for conducting performance evaluations for individual directors.

- The performance review is conducted internally with no external assistance
- The performance review is conducted internally using an outside resource or tool (e.g., an online survey tool)
- The performance review is conducted by a consulting firm (or other third-party external to the company)
- A performance review is not currently conducted

Question 3.10 has been updated for 2017

Skip Logic: *If “We do not conduct evaluations” is selected for “Individual Directors” in question 3.7, the respondent will not be presented question 3.10*

3.11 Please describe the outside resource or tool used for conducting performance reviews noted in the prior question(s). Please limit your response to 500 characters.

This question requests an open-ended text response

Skip Logic: *Question 3.11 will only be presented if the answer choice “The performance review is conducted internally using an outside resource or tool (e.g., an online survey tool)” is selected in either question 3.8, 3.9, or 3.10*

3.12 Which internal company resources are involved in conducting your company’s performance evaluations of its Board, its committees and/or individual directors? Please select all that apply.

- The Chair of the Nominating or Governance Committee
- The General Counsel
- The Corporate Secretary
- The Chair of the Board or Lead Director
- Other (Please specify) _____

Skip Logic: *Question 3.12 will only be presented if “The performance review is conducted internally with no external assistance” OR “The performance review is conducted internally using an outside resource or tool (e.g., an online survey tool)” is selected in either question 3.8, 3.9 or 3.10*

3.13 Select the following that describes the consulting firm (or other third-party) used to conduct your company's performance evaluations of its Board, its committee and/or individual directors:

- The performance evaluations are conducted by an external consulting firm (or other third-party) with no other ties to the Board or senior leadership
- The performance evaluations are conducted by an external consulting firm (or other third-party) with which the Board or senior leadership works on other initiatives
- Other (Please specify) _____

Skip Logic: Question 3.13 will only be presented if the answer choice "The performance review is conducted by a consulting firm (or other third-party external to the company)" is selected in either question 3.8, 3.9, or 3.10

3.14 Which of the following best reflects your current Board leadership?

- The CEO and Chair roles are held by different individuals and the Chair is an independent director
- The CEO and Chair roles are held by different individuals but the Chair is not an independent director
- The CEO and Chair roles are held by the same person, but we have a lead independent director
- The CEO and Chair roles are held by the same person, and we do not have a lead independent director

Question 3.14 is new for 2017

Skip Logic: Question 3.14 will only be presented if the answer to question 3.2 is a number greater than zero.

3.15 How many directors sit on your Board or governing authority? For purposes of this question, the term "director(s)" shall refer to member(s) of your company's governing authority if different than a Board.

This question requires a numeric response

Question 3.15 is new for 2017

3.16 How many directors on your company's Board or governing authority are women? For purposes of this question, the term "director(s)" shall refer to member(s) of your company's governing authority if different than a Board.

This question requires a numeric response

Question 3.16 has been updated for 2017

3.17 Ethisphere believes that diversity at the Board or other governing authority level is an important aspect of effective governance. Diversity is a concept that is difficult to simply define or measure, especially in a questionnaire completed by companies located around the world. For this reason, explain any diversity, as your company defines it, among the directors on your Board or other governing authority.

Please exclude a discussion of gender within the Board or other governing authority, as that information is captured in a separate question. For purposes of this question, the term “director(s)” shall refer to member(s) of your company’s governing authority if different than a Board. Please limit your explanation to no more than 500 characters.

This question requires a text response

Question 3.17 is new for 2017

3.18 How many C-suite level employees (e.g., 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?

This question requires a numeric response

Question 3.18 is new for 2017

3.19 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?

This question requires a numeric response

Question 3.19 is new for 2017

3.20 Ethisphere believes that diversity at the executive level is an important aspect of effective leadership. Diversity is a concept that is difficult to simply define or measure, especially in a questionnaire completed by companies located around the world. For this reason, explain any diversity, as your company defines it, among the C-suite or executive leadership level (i.e., CEO or President and his or her direct reports, excluding administrative staff).

Please exclude a discussion of gender roles at the executive level, as that information is captured in a separate question. Please limit your explanation to no more than 500 characters.

This question requires a text response

Question 3.20 is new for 2017

3.21 What tenure limiting mechanisms does your company use to control which independent 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

Skip Logic: Question 3.21 will only be presented if “Board of Directors”, “Board of Trustees or Governors”, “Board of Advisors” or “Supervisory Board” is selected for question 3.1 AND the answer to question 3.2 is a number greater than zero.

3.22 Select the critical role succession plan(s) your company’s Board or governing authority has in place. Please select all that apply.

	Identified high potential internal candidates for potential succession and formal plan in place	Identified high potential internal candidates for potential succession but no formal plan	No board involvement in identification of high potential internal candidates
CEO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General Counsel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chief Financial Officer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chief Internal Auditor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 3.22 is new for 2017

3.23 Does your company provide a version of its Code of Conduct to the Board or other governing authority?

- Yes, the Board or other governing authority receives our company's Code of Conduct
- Yes, 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)
- No, our company does not provide the Code to the Board

3.24 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 Board-specific version of the Code

of Conduct? For purposes of this question, the term “director(s)” shall refer to member(s) of your company’s governing authority if different than a Board.

- Yes, Directors receive the same Code of Conduct training as employees
- Yes, but Directors receive a Board-specific version of Code of Conduct training
- No, Directors do not receive Code of Conduct training

3.25 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. Note that this training need not be delivered by the ethics and compliance function.

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. For purposes of this question, the term “director(s)” shall refer to member(s) of your company’s governing authority if different than a Board. Please select all that apply.

	As part of on-boarding or orientation	Education or training on topic included as part of compliance program updates	As part of documented, periodic training initiatives
Anti-trust 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"/>
Regulations or trends regarding preventing human trafficking, slavery, indentured servitude or forced labor	<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"/>
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 (Please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 3.25 has been updated for 2017

3.26 Which of the following practices does your company use to expose independent 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 to include locations where our company has business functions, units, subsidiaries and/or field operations
- As part of our onboarding process we require independent 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 during onboarding, we require independent 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 independent 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 independent 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 independent 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 do not have business function, units, subsidiaries or field operations in any locations other than our primary headquarters
- None of the above

Question 3.26 is new for 2017

Skip Logic: Question 3.26 will only be presented if the answer to question 3.2 is a number greater than zero.

3.27 Select the following regarding your company's annual shareholder meeting. Please select all that apply.

- All directors of our company's Board are required to attend the company's annual shareholder meeting
- Independent directors are encouraged to attend the company's annual shareholder meeting, but it is not a requirement
- One or more of the independent directors of our company's Board makes themselves available for questions from shareholders at the company's annual shareholder meeting
- Not applicable, as our Company does not have shareholder meetings
- None of the above

Question 3.27 has been updated for 2017

Skip Logic: Question 3.27 will only be presented if "Board of Directors", "Board of Trustees or Governors", "Board of Advisors" or "Supervisory Board" is selected for question 3.1

3.28 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 3% 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 5% 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 twenty shareholders
- No, shareholders wishing to nominate their own directors may not access the company's ballot

Question 3.28 is new for 2017

Skip Logic: Question 3.28 will only be presented if the answer to question 2.4 is "Public company"

3.29 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 over the management of your company:

This question requests an open-ended text response

Skip Logic: Question 3.29 will only be presented if the answer to question 3.1 is “Partnership/Owners/Members (and no other formal governing authority)”

3.30 Because 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 compliance and ethics function:

This question requests an open-ended text response

Skip Logic: Question 3.30 will only be presented if the answer to question 3.1 is “My company does not have a governing authority”

3.31 Please provide any additional commentary as it pertains to your company's Governance program you believe supports your questionnaire answers. Please limit your response to 500 characters.

This question requests an open-ended text response

Part 4: Compliance & Ethics Program

The Compliance & Ethics Program section measures your company's program across the "hallmarks" of an effective compliance and ethics program as outlined by the Federal Sentencing Guidelines, and best practices including:

- Program structure, responsibility and resources
- Program oversight and the tone at the top
- Written standards, including policies and procedures
- Risk assessment and management
- Training, awareness and communication
- Due care
- Detection, monitoring and auditing, including measurement of culture
- Enforcement and discipline

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

4A.1 Specify all job titles held by the person assigned overall ownership of the compliance and ethics 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
- Executive, Senior, or Vice President (or similar level)
- Director (or similar level)
- Manager (or similar level)
- Other (Please specify) _____
- There is no person assigned overall responsibility for the compliance and ethics program

Question 4A.1 has been updated for 2017

4A.2 Briefly describe how the compliance and ethics 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.

This question requests an open-ended text response

4A.3 What percentage of his or her time does the person assigned overall responsibility for the compliance and ethics program dedicate to that role?

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

4A.4 Given the person assigned overall responsibility for the compliance and ethics program is also the General Counsel and/or dedicates less than 90 percent of their time to the compliance and ethics role, is there a person in addition to the person with overall authority who is assigned day-to-day operational responsibility for the compliance and ethics program?

- Yes
- No

Question 4A.4 is new for 2017

Skip Logic: Question 4A.4 will only be presented if the answer to question 4A.1 is "General Counsel or Chief Legal Officer" OR if the answer to question 4A.3 is "0 - 50 percent", "51 - 75 percent", or "76 - 90 percent"

4A.5 When the person with overall responsibility for the compliance and ethics program communicates with the Board, a Board committee, or other governing authority regarding the compliance and ethics program, is the person who is assigned day-to-day operational responsibility for the compliance and ethics program generally present?

- Yes
- No

Skip Logic: Question 4A.5 will only be presented if the answer to question 4A.4 is "Yes"

4A.6 To whom does the person with overall responsibility for the compliance and ethics program administratively or managerially report?

- Board of Directors, a committee of the Board, or other governing authority
- Chairperson of the Board Committee directly overseeing the Ethics and Compliance function
- Chief Executive Officer
- General Counsel or Chief Legal Officer
- Chief Financial Officer
- Chief Administrative Officer
- Chief Risk Officer
- Chairperson of the Board (if not also the Chief Executive Officer)
- Other (Please specify) _____

4A.7 Is there a formal 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 compliance and ethics program is terminated?

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

4A.8 Who conducts the annual performance review of the person assigned overall responsibility for the compliance and ethics program?

- The Board (or other governing authority) and/or the Board committee that has oversight of compliance and ethics
- The direct manager (if other than the Board or other governing authority)
- The direct manager (if other than the Board or other governing authority) with input from the entire Board or other governing authority
- The direct manager (if other than the Board or other governing authority) with input from the Board committee that has oversight of compliance and ethics

4A.9 Who makes compensation decisions for the person assigned overall responsibility for the compliance and ethics program?

- The Board (or other governing authority) and/or the Board committee that has oversight of compliance and ethics
- The direct manager (if other than the Board or other governing authority)
- The direct manager (if other than the Board or other governing authority) with input from the entire Board or other governing authority
- The direct manager (if other than the Board or other governing authority) with input from the Board committee that has oversight of compliance and ethics

4A.10 Identify which of the following authorities, if any, are granted to the compliance and ethics 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 Ethics and Business Conduct (with Board approval if required)
- Primary budget responsibility for all compliance and ethics programs
- Primary hiring authority for all positions in the compliance and ethics function
- Input on other hiring/firing decisions regarding positions of authority which may affect compliance and ethics functions (e.g., Audit, Finance, HR)
- Final approval authority for field compliance operations/initiatives
- 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 in product/supplier sourcing strategy, including supply-chain due diligence and oversight

Question 4A.10 has been updated for 2017

4A.11 Select the types of interactions the compliance and ethics 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 compliance and/or ethics questions to employee surveys
- 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 (please specify the type and nature of this committee) _____

Question 4A.11 has been updated for 2017

4A.12 Does your company have employees located within various business regions or business units who formally serve as compliance and ethics 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 a compliance and ethics point of contact or regional liaison.

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

4A.13 How often does the person with overall responsibility for the compliance and ethics program normally communicate with the Board, a Board committee, or other governing authority? If this person communicates with both the full Board as well as with a Board committee with various frequencies, 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

4A.14 Indicate which information, if any, your company reports to the Board and/or Board committee, or other governing authority. Please select all that apply.

- Overall compliance and ethics program performance
 - Overview of key initiatives
 - Hotline and misconduct reporting statistics
 - Details on misconduct investigations and resolutions
 - Compliance and ethics training initiatives and results
 - Compliance and ethics communication initiatives
 - Compliance and ethics program audit, assessment and/or benchmarking findings
 - Compliance and ethics risk assessment findings
 - Compliance and ethics 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
 - Significant regulatory and legal updates
 - Compliance and ethics 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)
-

4A.15 Does your company have an internal committee dedicated to compliance and ethics?

- Yes
- No

Skip Logic: If "No" is selected for question 4A.15, the respondent will be directed to question 4A.19

4A.16 Which of the following applies to your internal compliance and ethics committee? Please select all that apply.

- Executive-level committee (C-Suite)
- Manager-level committee
- Cross-functional committee
- Committee has a charter or written guidelines
- None of the above

4A.17 How often does the internal compliance and ethics committee meet?

- Regularly scheduled, more often than quarterly
- Regularly scheduled, quarterly
- Regularly scheduled, three times per year
- Regularly scheduled, two times per year
- Regularly scheduled, annually
- Ad hoc only, as needed

4A.18 Indicate which topics are regularly discussed during the internal compliance and ethics committee meetings. Please select all that apply.

- Overall program performance and key program initiatives
- Hotline and reporting statistics
- Misconduct investigations and resolutions
- Compliance and ethics training and communication initiatives
- Compliance and ethics program assessment
- Compliance and ethics program benchmarking against practices of other companies
- Compliance and ethics risk management
- Culture of ethics
- Significant regulatory and legal updates
- Information security
- Privacy risk management
- Industry trends and best practices updates
- Other topics (Please specify) _____

Question 4A.18 has been updated for 2017

4A.19 What is the approximate number of full-time employee ("FTE") equivalents dedicated to compliance and ethics function/activities throughout your company?

This question requires a numeric response

4A.20 What are the approximate annual costs (in U.S. dollars) incurred by compliance and ethics 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

4A.21 Please select the top three compliance and ethics program-related expense items for your company in order of largest source of spend to smallest source of spend. Please select one answer per column.

	Largest Source of Spend	Second Largest Source of Spend	Third Largest Source of Spend
Compliance and ethics personnel (salaries, benefits, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Business controls	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information systems	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Incident reporting hotlines and resources	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Communications-related expenses (e.g., Tool kits, newsletters, publications)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Consultants, other than outside counsel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Outside counsel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance-related fines, penalties, and damages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information, data, and subscription services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Association or membership fees	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (Please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Part 4B: Due Care

4B.1 Select the following that describes your company's efforts to ensure that individuals in leadership positions (or "positions of trust") have not engaged in illegal activities or other misconduct. (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). Please select all that apply.

- Our company conducts background checks on all employees (where permitted by law)
- Our company does not conduct background checks on any employees
- Our company conducts background checks on some employees (where permitted by law)
- Our company conducts background checks on all independent directors (where permitted by law)
- Our company conducts checks on all employees against debarment or exclusion lists
- None of the above

Question 4B.1 has been updated for 2017

4B.2 Indicate which business functions require a background check. Please select all that apply.

- Personnel with compliance or ethics responsibilities and/or functions
- Personnel within the Human Resources function
- Personnel within the Finance and/or Accounting function
- Key personnel within the Procurement function
- Personnel within the Internal Audit function
- Personnel within the Information Technology function
- Personnel within the Corporate Security function
- None of the above

Skip Logic: Question 4B.2 will only be presented if the answer to question 4B.1 is "Our company conducts background checks on some employees (where permitted by law)"

4B.3 Indicate when background checks are generally performed. Please select all that apply.

- Hiring
- Upon promotion into certain business roles or positions
- Annually
- Every two to four years
- Every five or more years
- None of the above

Question 4B.3 has been updated for 2017

4B.4 Does your company require conflict of interest certifications and/or disclosures (separate from a Code of Business Conduct acknowledgement) from employees?

- Yes, for all employees
- Yes, but only for employees at certain seniority levels or within certain business functions
- No
- No, but we do require all employees to certify that they will follow our Code and the certification specifically includes language (in addition to any included in the Code) regarding disclosing or avoiding conflicts of interest
- No, but we do require some employees to certify that they will follow our Code and the certification specifically includes language (in addition to any included in the Code) regarding disclosing or avoiding conflicts of interest

Question 4B.4 has been updated for 2017

4B.5 How frequently does your company require the conflicts of interest acknowledgment and/or disclosure discussed in the previous question (4B.4)? Please select all that apply.

- Upon joining the company
- Annually
- Every two years
- Every three years
- Ad hoc basis
- Prior to closing any significant transaction, deal, or agreement

Question 4B.5 has been updated for 2017

Skip Logic: Question 4B.5 will only be presented if the answer to question 4B.4 is either “Yes, for all employees”, “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 and the certification specifically includes language (in addition to any included in the Code) regarding disclosing or avoiding conflicts of interest” OR “No, but we do require some employees to certify

that they will follow our Code and the certification specifically includes language (in addition to any included in the Code) regarding disclosing or avoiding conflicts of interest”

Part 4C: Written Standards, Including Policies and Procedures

4C.1 Does your company maintain a stand-alone, company-wide written Code of Ethics and Business Conduct (“Code”)?

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

Skip Logic: If “No” is selected for question 4C.1, the respondent will be directed to question 4C.5

4C.2 Is there a written requirement documenting the frequency with which the Code is reviewed to determine whether an update is needed?

- Yes
- No, this is not formally documented

Question 4C.2 has been updated for 2017

4C.3 Does your company translate the Code into multiple languages?

- Yes, we translate the Code into all languages necessary to train 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

4C.4 How is the Code document communicated to employees? Please select all that apply.

- By email as a link or attachment
- Hard copy as part of onboarding or orientation process
- Hard copy mailed to employees
- Made available on-demand on the company intranet (e.g., SharePoint)
- Made available during Code training (i.e., a link to or a copy of the Code provided)
- Pushed out to employees via a mobile app. or other dynamic link

Question 4C.4 has been updated for 2017

4C.5 Select which written policies your company has in place (separate from the Code) that address the following risk areas. Please select all that apply.

- Anticorruption/bribery
- Antitrust/competition
- Confidential information (e.g., employees, company, customers, clients and/or consumers)
- Conflict minerals
- Conflicts of interest
- Data privacy (e.g., employees, customers and/or consumers)
- Environmental protection
- Equal employment opportunity/diversity/discrimination
- Fair dealing (fair business practices)
- Fair employment/labor standards
- Financial integrity and fraud
- Gifts and entertainment
- Human trafficking
- Information security
- Insider trading
- Intellectual property
- Misconduct investigations
- Money laundering
- Non-retaliation
- Policy management
- Political contributions, activities and lobbying
- Procurement integrity/dealing with suppliers/supply chain oversight
- Protecting company assets
- Records management and retention
- Social media
- Workplace harassment
- Workplace health and safety

Question 4C.5 has been updated for 2017

4C.6 How are ethics and compliance policies generally distributed throughout your company?

Please select all that apply.

- Based on risk, some policies (other than the Code) are sent at least annually via email, either as attachments or as a link to downloadable file(s)
- All policies are provided on an intranet site or portal that is accessible across the entire enterprise
- Based on risk, some policies are provided in hard copy at least annually to those employees without computer or internet access
- 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) are included within some of our training
- Policies (separate from the Code) are provided as part of training
- Our policies are distributed in a unique fashion (Please specify) _____

Question 4C.6 has been updated for 2017

4C.7 How does your company update and assign ownership of its ethics and compliance policies? Please select all that apply.

- Policies are updated as needed (e.g., in response to changes in regulation or business climate)
- Policies are reviewed and updated as needed on a formal schedule (e.g., annually)
- Policies are assigned owners who are primarily responsible for content updates
- There is a committee that reviews new policies or proposed updates to existing policies and approves them as appropriate
- Our company updates policies/assigns policy ownership in another way (please specify)

Question 4C.7 has been updated for 2017

4C.8 How are your ethics and compliance policies stored across the company?

- Policies are stored across various sites, locations, and/or platforms, without a centralized catalog or database
- Policies are stored in a centralized enterprise-wide database
- Policies are stored in a centralized enterprise-wide database that interfaces with other information sources (e.g., regulatory database, risk assessment platform, and/or case management or reporting systems)
- Our company uses another storage/management system (please specify)

4C.9 Which of the following uses of intellectual property are explicitly covered in your employee policies (including in the Code)? Please select all that apply.

- Use of counterfeit goods or components in any aspect of your company's business operations
- Use of unlicensed or unauthorized trademarks in your company's products or services
- Use of others' registered or protected designs without authorization
- Patents, including the use of others' patented inventions without authorization
- Unauthorized use of copyrighted material, including use of other companies' content on the company's computers
- Unauthorized use of software, including downloading of software for personal use on company computers
- Unauthorized use of your company's own proprietary information and trade secrets
- Use of third parties' (including former employers') proprietary information and trade secrets
- Disclosure and use of confidential and proprietary information only on a "need to know" basis and other restrictive terms

4C.10 Does your company maintain a third party (e.g., supplier, agent, intermediary, reseller)

Code of Conduct?

- Yes
- No

Part 4D: Compliance and Ethics Risk Assessment and Management

4D.1 Does your company assess compliance and ethics risk?

- Yes
- No

Skip Logic: If "No" is selected for question 4D.1, the respondent will be directed to question 4D.8

4D.2 Briefly describe your company's compliance and ethics risk assessment methodology. Please limit your response to 500 characters.

This question requests an open-ended text response

Question 4D.2 is new for 2017

4D.3 Please select the following that best describes your company's compliance and risk assessment process:

- Our compliance and ethics risk assessment is part of a broader, company-wide risk assessment
- Our compliance and ethics risk assessment is its own distinct process

4D.4 Which best describes how often your company conducts formal risk assessments to determine compliance, regulatory and ethics-related risks?

- Annually
- Every two years
- Every three years
- Every four years
- Every five years
- Less often than every five years
- On an ad hoc basis

4D.5 Which of the following types of risks are reviewed by your company? Please select all that apply.

	As part of a standalone E&C Risk Assessment	As part of an ERM process with significant involvement of the E&C function	As part of an ERM risk assessment without significant involvement of the E&C Function
Anticorruption/bribery	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Antitrust/competition	<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"/>
Equal employment opportunity/diversity/discrimination	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fair dealing (fair business practices)	<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"/>
Human trafficking	<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"/>
Intellectual property	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Misuse of company assets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Money laundering	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>
Records management and retention	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social media	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Workplace harassment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Workplace health and safety	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 4D.5 has been updated for 2017

4D.6 What does your company consider when assessing compliance and ethics risks? Please select all that apply.

- Recently passed regulations
- Trends, or developments in the compliance and ethics field (e.g., legal decisions, regulatory actions, settlements, and/or fines)
- Perceived risks by peer organizations
- Significant changes to the business (e.g., geographic footprint, acquisitions)
- Adequacy of current policies, procedures, and controls
- Employee focus groups
- Employee interviews
- Employee surveys and assessments (e.g., engagement survey or culture survey)
- Investigation results and root cause analysis
- Hotline reporting statistics/trends
- Usage statistics for compliance resources (e.g., click metrics on intranet postings, open rates for links in communication materials, downloads of manager toolkits)
- Audit reports for compliance-related audits
- Focus groups of management
- Interviews of management
- Other (Please specify) _____

Question 4D.6 has been updated for 2017

4D.7 Select the following that describes how your company uses the findings from the assessment of compliance and ethics risks. Please select all that apply.

- To revise our company's policies (other than the Code)
- To revise our company's Code
- To revise our company's procedures
- To update our company's training or the training plan
- To update our company's communications or the communication plan
- To revise our company's annual audit plan (Internal Audit or other)
- Other uses (Please specify) _____

4D.8 Select the following that are included in your company's Information Security Program. Note that the Information Security Program may consist of more than one document or policy. Please select all that apply

- An up to date (current to within the previous year) documented inventory of the company's actual information collection, use, storage, sharing, protection and disposal practices
- Documentation of how the company assesses privacy or data security risk (i.e., the process for conducting a risk assessment)
- Documentation of laws and regulations applying to the company's information collection, use, storage, sharing, protection, retention and disposal practices
- Documentation of the company's potential privacy or data security risks (i.e., the results of the risk assessment)
- Documentation of processes or procedures to mitigate the company's potential data security risks
- Documented management oversight and approval of the Information Security Program
- Documented regular monitoring and testing of the company's systems
- Documented business continuity management plan
- Documented incident response plan
- Documented procedures or requirements for selecting third parties that store, process, transmit or access sensitive information on behalf of the company
- Documented procedures or requirements for due diligence into and contractual language requirements that will be required for engagements with third parties that store, process, transmit or access sensitive information on behalf of the company
- Documented policy as to how and when data storage devices such as flash drives may be used
- Documented policy as to how and when data will be destroyed
- Encryption of sensitive data stored on all laptops
- Encryption of sensitive data stored on flash drives
- Use of data loss prevention tools (i.e., an automated mechanism to prevent sensitive information from being moved from your system)
- Use of intrusion prevention systems
- Board approval for the Information Security Program
- An individual designated as the company's security officer
- An individual designated as the company's privacy officer
- An employee certification process related to the amount of training each employee has completed as part of the information security training program

4D.9 Which of the following apply to how your company manages its exposure to human trafficking risk? Please select all that apply.

- Our company maintains a communications program promoting a zero-tolerance policy prohibiting human trafficking 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 procedure preventing all agents and subcontractors from engaging in trafficking in persons and requires that our company terminates any agents, subcontractors, or subcontractor employees that have engaged in human trafficking-related activities
- Our company uses other, unique efforts to prevent human trafficking (Please specify)

- Our company or our supply chain have a limited, non-material exposure to human trafficking risk

Part 4E: Compliance and Ethics Training, Awareness and Communication

Q4E.1 Does your company provide compliance and ethics training to its workforce?

- Yes
- No

Skip Logic: If "No" is selected for question 4E.1, the respondent will be directed to question 4E.15

Q4E.2 Does your company have a formally documented compliance and ethics training curriculum or plan?

- Yes
- No

Skip Logic: If "No" is selected for question 4E.2, the respondent will be directed to question 4E.5

Q4E.3 Select the following that apply to your company's compliance and ethics training curriculum or plan. Please select all that apply.

- Our company's plan applies to training delivered during on-boarding or orientation
- Our company's 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 a product of cross-functional collaboration
- Our company's training plan includes target completion rates
- Our company's training plan addresses training frequency by topic
- Our company's training plan addresses modality of training delivery for each topic and/or audience
- Our company's training plan includes a training roll out schedule
- Our company's training plan includes metrics to measure effectiveness (other than training completion rates)
- Other (Please specify) _____

Question 4E.3 has been updated for 2017

Q4E.4 How does your compliance and ethics 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 employee location or geography
- Our plan defines target training audiences by misconduct trends
- Our plan defines target training audiences by another unique characteristic (please specify)

Question 4E.4 has been updated for 2017

Q4E.5 What percentage of your company's workforce has completed training on the Code 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
- Not sure
- Our company does not provide training on our Code

Q4E.6 Indicate how your company administers the following targeted, risk-specific training programs to employees in addition to or instead of dedicated Code of Conduct training. Please

select all that apply, and leave blank any risk area or topic for which your company does not provide training.

	Training delivered asynchronously (i.e., on-demand) using online or digital modalities	Training delivered synchronously (i.e., live) using online or digital modalities	Training delivered synchronously (i.e., live) using in-person training sessions
Anticorruption/bribery	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Antitrust/competition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Company assets	<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"/>
Equal employment opportunity/diversity/discrimination	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fair dealing (fair business practices)	<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"/>
Human trafficking	<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"/>
Intellectual property	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Money laundering	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>
Records management and retention	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social media	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Workplace harassment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Workplace health and safety	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 4E.6 has been updated for 2017

4E.7 Does your company provide targeted training to employees in higher risk areas on how to recognize corruption red flags and what to do about them? Higher risk areas may include finance, accounting, sales and procurement, and any other employees who interact with government officials, agents, or with third parties that interact with government officials or agents.

- Yes
- No

4E.8 Which of the following compliance- and ethics-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
- Progressive course difficulty based on employee job responsibilities
- Progressive course difficulty based on employee tenure
- Allowing employees to select or self-direct the topics covered in a certain amount of their required training
- None of the above

Question 4E.8 has been updated for 2017

4E.9 How does your company encourage or enforce completion of compliance- and ethics-related training? Please select all that apply.

- Completion of training is factored into 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 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
- Other encouragement or enforcement techniques (Please specify) _____

4E.10 Does your company provide targeted training to managers (i.e., employees with supervisory responsibility) on their special responsibilities with regards to compliance and ethics? Note that this training cannot be limited solely to manager training regarding sexual harassment as required in specific jurisdictions.

- Yes, to all managers
- Yes, more than half of managers receive manager-specific compliance and ethics training
- Yes, fewer than half of managers receive manager-specific compliance and ethics training
- No

Skip Logic: If "No" is selected for question 4E.10, the respondent will be directed to question 4E.14

Question 4E.10 has been updated for 2017 to provide clarification

4E.11 Select the following that applies to the manager training on compliance and ethics. 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
- Includes testing that measures manager training knowledge comprehension
- Testing results are tracked and maintained
- Completion of training is a part of a manager's performance evaluation
- Completion is mandatory for all managers with direct reports
- None of the above

4E.12 Select the following topics that are addressed by the manager training on compliance and ethics. Please select all that apply.

- Effectively communicating ethics to subordinates
- Promoting a culture of compliance and ethics
- Incorporating ethics in business decision making
- Encouraging employees to speak up, express concerns, and report misconduct
- Handling employee reports or concerns
- Identifying and preventing retaliation
- Creating and maintaining an open door environment
- Conducting employment interviews
- Other topics (Please specify) _____

4E.13 How is manager-specific training on compliance and ethics delivered within your organization? Please select all that apply.

- Manager training is delivered asynchronously (i.e., on-demand) using online or digital modalities
- Manager training is delivered synchronously (i.e., live) using online or digital modalities
- Manager training is delivered synchronously (i.e., live) using in-person training sessions

Question 4E.13 is new for 2017

4E.14 Identify which of the following methods you utilize to measure the effectiveness of your compliance training. Please select all that apply.

- Comprehension tests delivered immediately following training
- Culture of ethics employee assessments (at least every two years)
- Documented employee or manager feedback, collected through interviews, surveys, or focus groups after rollout
- Employee knowledge assessments or surveys, 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 rollout timing
- Tracking frequency of policy/code/resource downloads from the ethics intranet site or portal in the context of when training is administered
- Other methods (please specify) _____
- None of the above

Question 4E.14 has been updated for 2017

4E.15 Does your compliance and ethics function maintain a documented compliance and ethics communication plan?

- Yes
- No

Skip Logic: If "No" is selected for question 4E.15, the respondent will be directed to question 4E.18

4E.16 Select the following that apply to your company's compliance and ethics 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 frequency
- Addresses communication delivery mechanism for each topic or audience
- Calls for implementation by different functions or business units (e.g., Compliance, HR, Finance, Sales)
- Uses message delivery by different leaders (e.g., CEO, Chief Compliance Officer, Heads of other functions and/or business units, other managers, etc.)
- Includes metrics to measure effectiveness
- None of the above

4E.17 How does your compliance and ethics 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 tenure
- 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 according to another unique characteristic (please specify)

4E.18 Which communication modalities (aside from formal training programs) does your company use to communicate compliance and/or ethics messages within your company? Please select all that apply.

- Company e-Bulletin/newsletter
- Printed and/or electronic information materials (such as brochures, guidebooks, posters, wallet cards, table tents and/or checklists)
- Video/dedicated internal TV channel
- Emails
- Podcasts
- Town hall meetings
- Periodic, company-wide kick-off meetings
- Senior executives' meetings
- Intranet portal dedicated to compliance and ethics
- Ethics blog or intranet forum
- Interactive scenarios, games, quizzes and/or vignettes
- Periodic compliance "road show" or site visit by compliance
- Ethics-related promotional/merchandising items
- 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

Question 4E.18 has been updated for 2017

4E.19 Select the following compliance and ethics communication resources, if any, that your company provides to managers/supervisors in order to help them promote compliance and ethics within the company. Please select all that apply.

- Compliance and ethics communication toolkit(s) or meetings-in-a-box (e.g., suggestions of topics to discuss, speaking guides, presentation materials)
- Email templates from the compliance and ethics function specifically created for managers to disseminate among employees
- Flyers, posters, or other visual materials specifically created for managers to disseminate among employees
- Regularly scheduled discussion time with compliance and ethics personnel (e.g., brown bag lunches, seminars, or compliance and ethics team roadshow)
- Tools and resources for recognizing or incentivizing direct reports that exhibit ethical conduct or promote the compliance program
- Videos, online vignettes, or other educational multimedia resources
- Research, whitepapers, or curated news reports on compliance and ethics issues specifically directed at managers
- Regularly scheduled time at manager-level meetings to discuss compliance and ethics subjects
- Other resources (Please specify) _____

4E.20 Select which types of communication involving senior executives outside the compliance function, such as the CEO, are used to discuss compliance and ethics within your company. Please select all that apply.

- Personalized letter of introduction to the written Code of Conduct
- Personalized introduction to compliance and ethics training
- Emails to the workforce
- Onboarding video
- Intranet site video
- 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
- Compliance and ethics blog by member(s) of senior leadership
- Newsletter
- Intracompany social communication platforms (e.g., Chatter, Yammer, Slack)
- Other types of communication (Please specify) _____

Question 4E.20 has been updated for 2017

4E.21 Do senior executive leaders include examples of ethical decisions they have faced in their communication materials?

- Yes
- No

4E.22 Does the compliance and ethics function include examples of real world ethical or compliance dilemmas or issues in their communication materials? Please select all that apply.

- 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

Question 4E.22 has been updated for 2017

Part 4F: Detection, Monitoring and Auditing

4F.1 Does your company use a misconduct reporting system (e.g., internal reporting mechanisms, dedicated email address, or internal or third-party maintained hotlines)?

- 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

Skip Logic: If “Yes, but reporting individuals are not given the option to remain anonymous” OR “No, our company does not use a misconduct reporting system” is selected for question 4F.1, the respondent will be directed to question 4F.3

4F.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.

_____ Approximate percentage of hotline reports that were anonymous

This question requires a numeric response

Question 4F.2 has been updated for 2017

4F.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 with the ability to log and track reports and related investigations regardless of how the report was originally made (e.g., tracks reports made to a manager and not 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

4F.4 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 located on the company intranet site
- Web-based reporting tool accessible online and available to the general public
- Reporting via text message
- Live chat functionality
- Company-wide reporting email account
- Dedicated fax line
- App or mobile-specific reporting tool or platform
- Exit surveys or interviews
- Other resources or tools (Please specify) _____

Question 4F.4 has been updated for 2017

4F.5 Does the hotline used for reporting misconduct and raising concerns provide the ability to report concerns or questions using multiple languages?

- Yes, we provide the ability to report concerns or questions in multiple languages
- No, we do not provide multilingual reporting capabilities because our workforce is monolingual
- No, we do not provide multilingual reporting capabilities

Skip Logic: Question 4F.5 will only appear if the answer to question 4F.4 is either "Third party-maintained hotline" or "In-house hotline"

4F.6 Indicate the individuals or functions advertised as available channels for reporting misconduct and raising concerns. Please select all that apply.

- Board of Directors, Board Committee, or other governing authority
- Ombudsperson
- Chief Executive Officer
- Legal Department
- Compliance, or ethics department/function
- Chief Information or Security Officer
- Human Resources
- Internal Audit
- Regional compliance and ethics ambassadors, liaisons, or representatives
- Employee's direct manager or supervisor
- Other (Please specify) _____

Question 4F.6 has been updated for 2017

4F.7 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.

- Yes, and we make this information available to the public as a stand-alone report
- Yes, and we make this information available to the public in our CSR report and/or in our annual report
- Yes, and we circulate this information to all employees
- Yes, and we circulate this information to senior leaders or management
- No, we do not communicate this information

Question 4F.7 has been updated for 2017

4F.8 Has your company benchmarked your compliance and ethics program against those of other companies within the last three calendar years?

- Yes
- No

Question 4F.8 is new for 2017

Skip Logic: If "No" is selected for question 4F.8, the respondent will be directed to question 4F.10

4F.9 What sources of data has your company used to benchmark its compliance and ethics program? Please select all that apply.

- Informal peer networks
- Industry organizations
- Compliance and ethics trade associations or membership groups
- Third party consultants or outside counsel
- Other (Please specify) _____

Question 4F.9 is new for 2017

4F.10 Does your company conduct a formal evaluation of the compliance and ethics program in order to assess its effectiveness or performance? Please select all that apply.

Note that for the purposes of this questionnaire a “formal” evaluation can be conducted either internally or by a third party, but must follow a documented structure and result in some form of documentation. 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.

- We conduct periodic evaluations of the effectiveness of the entire compliance and ethics program as part of our risk assessment process
- We conduct periodic evaluations of the effectiveness of the entire compliance and ethics program as a separate process from our risk assessment process
- We conduct periodic evaluations of the compliance and ethics 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

Question 4F.10 has been updated for 2017

Skip Logic: *If “No, we do not conduct a formal evaluation of our program” is selected for question 4F.10, the respondent will be directed to question 4F.14*

4F.11 How often does your company conduct an evaluation of the entire compliance and ethics program?

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

Question 4F.11 has been updated for 2017

Skip Logic: Question 4F.11 will be presented only if the answer to question 4F.10 is either “We conduct periodic evaluations of the effectiveness of the entire compliance and ethics program as part of our risk assessment process” OR “We conduct periodic evaluations of the effectiveness of the entire compliance and ethics program as a separate process from our risk assessment process”

4F.12 Select the following function(s) responsible for your company’s evaluation of the effectiveness or performance of its compliance and ethics program.

	Function is Primarily Responsible	Function Provides Support or Significant Input
Internal audit	<input type="checkbox"/>	<input type="checkbox"/>
Compliance and ethics	<input type="checkbox"/>	<input type="checkbox"/>
Legal	<input type="checkbox"/>	<input type="checkbox"/>
Finance	<input type="checkbox"/>	<input type="checkbox"/>
Human resources	<input type="checkbox"/>	<input type="checkbox"/>
Operations/manufacturing	<input type="checkbox"/>	<input type="checkbox"/>
Communications/PR	<input type="checkbox"/>	<input type="checkbox"/>
External, third party consultant(s) (please specify which firm[s])	<input type="checkbox"/>	<input type="checkbox"/>
Other departments (please specify)	<input type="checkbox"/>	<input type="checkbox"/>

Question 4F.12 has been updated for 2017

4F.13 Which components of the compliance and ethics program are evaluated during the effectiveness or performance evaluation process? Please select all that apply.

- Organizational culture of ethics
- Risk assessment processes/protocols
- Employee knowledge of compliance issues
- Code of Conduct
- Compliance and ethics policies
- Compliance and ethics training curriculum or program
- Compliance and ethics communication program
- Procedures and controls surrounding conflicts of interest
- 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
- Privacy Program
- Information Security Program
- The system used to receive and/or track reports of alleged misconduct
- Investigation process
- Board oversight
- Third-party due diligence
- Procedures and controls to prevent retaliation against employees reporting possible misconduct

Question 4F.13 has been updated for 2017

4F.14 How does your company measure the effectiveness of its compliance and ethics efforts? Please specify in the text box provided and limit your response to 500 characters.

This question requests an open-ended text response

4F.15 When do you conduct compliance and ethics due diligence of third parties that pose a material compliance, ethics, and/or reputation risk? Please select all that apply.

- When selecting third parties
- During the contract renewal process with third parties
- On a periodic basis, at least every three years
- Our company does not conduct compliance- and ethics-related due diligence of third parties

Skip Logic: *If "Our company does not conduct compliance- and ethics-related due diligence of third parties" is selected for question 4F.15, the respondent will be directed to question 4F.17*

4F.16 What information, if any, do you consider in your compliance and ethics due diligence of third parties? Please select all that apply.

- Ownership information
- Information pertaining to use of sub-contractors
- Policy documentation
- Employee training program
- 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) _____

4F.17 How does your company establish its compliance and ethics 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 is a required condition of doing business with our company
- Our third parties are expected to follow our company 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 a required condition of doing business with our company
- A Supplier/Distributor/Third Party Code of Conduct is provided and, while adherence to the Code is not an explicit contractual requirement, third parties are expected to follow the Code
- Third party contracts include explicit provisions regarding supplier adherence to certain of our company's compliance and ethics expectations
- Our third parties are encouraged or required to obtain a third-party certification for compliance and ethics
- Some of our compliance and ethics communication initiatives specifically target our third parties
- Our company provides our third parties with compliance and ethics training assistance or resources
- Our company requires third parties to follow an industry code of conduct (e.g., the Electronics Industry Citizenship Coalition ("EICC") Code of Conduct)

Question 4F.17 has been updated for 2017

4F.18 Does your company maintain a procurement policy that addresses key aspects of third party selection, management, and compliance oversight?

- Yes
- No

4F.19 Does your company conduct periodic audits of third parties to ensure compliance with ethical and legal standards?

- Yes
- No

4F.20 Does your company track any entertainment 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 Logic: If "No, our company does not track gifts or entertainment" is selected for question 4F.20, the respondent will be directed to question 4F.26

4F.21 Select the following that describes the process or tool used to track entertainment and/or gifts given or received by your company's employees. Please select all that apply.

- Our company uses an automated tracking tool that allows for advance approvals
- Our company uses an automated tracking tool that allows for retroactive notifications and/or disclosures
- Our company uses an automated tracking tool that allows for the cumulative tracking of gifts or entertainment per recipient as well as by his/her company or entity (including government entities)
- Our company uses an enterprise-wide tracking process
- Our company tracks gifts and entertainment using accounting codes

4F.22 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) _____

4F.23 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) _____

4F.24 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) _____

4F.25 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) _____

4F.26 Which mechanisms, if any, does your company use to ensure compliance with ethical and legal standards related to bribery and corruption? Please select all that apply.

- Our company maintains clear anti-bribery standards that are consistently communicated to relevant employees
- Our company conducts periodic risk assessments for bribery and corruption risks
- Our company conducts periodic evaluations and benchmarking of our anticorruption program/initiatives
- Our company does not allow “facilitation payments” as a matter of policy
- Agency or distribution agreements, or intermediary contracts, include explicit provisions regarding compliance, including specific provisions regarding compliance with applicable bribery and corruption laws
- Our company’s hotline and some other reporting mechanisms are available to use for agents/intermediaries and their personnel
- Our company encourages or requires intermediary organizations to maintain a reporting hotline or other reporting mechanism
- Our company conducts due diligence when selecting an intermediary, including corruption-related due diligence
- Our company conducts ongoing monitoring/oversight of intermediary compliance programs or any compliance failures, including compliance with bribery and corruption laws and policies
- Our company conducts periodic intermediary audits to ensure compliance, including compliance with bribery and corruption laws and policies
- Our intermediaries are segmented into a number of tiers for the purpose of monitoring and auditing
- Intermediaries are encouraged or required to obtain a third-party certification or assurance for compliance and ethics, such as anticorruption certification (Please specify what certifications or assurances are requested) _____
- None of the above

4F.27 Our employees and contractors deal with our own and other companies' trade secrets in the following ways. Please select all that apply.

- Employees and contractors are required to keep our company's own trade secrets confidential and not to use or disclose them except as approved
- Employees and contractors are required to keep other companies' trade secrets confidential and not to use or disclose them except as approved by our company
- Our company has specific procedures that employees and contractors are required to follow, either under their employment agreement or other agreed terms, to make any disclosure of any trade secrets
- Under their initial contract and/or other agreement, our employees' and consultants' obligations to protect trade secrets continue in force even when their contracts, agreements or employment terminate
- Our company has an exit interview or other procedure whereby, when employees' and consultants' contracts terminate or their employment terminates, they are required to return any company or third-party confidential material to the company
- If an employee or consultant breaches our company's contract and discloses or uses trade secrets without permission, our company has specific remedies in the contract for redressing this

4F.28 Indicate how your company manages privacy and data security risks relating to third parties that store, process, transmit or access sensitive information on behalf of the company. 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 sensitive 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 sensitive information
- Our company requires contractual language regarding who will have access to our company's sensitive 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 process and procedure the third party will use to prevent, detect, and mitigate a breach of our company's sensitive data
- Our company requires contractual language requiring timely notification in the event of a data breach concerning our company's sensitive 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 sensitive information

Question 4F.28 has been updated for 2017

Part 4G: Measurement of Culture

4G.1 Indicate which of the following, if any, that accurately describes your company's approach to measuring corporate ethical culture. Please select all that apply.

- Our company uses employee focus groups or individual interviews
- Our company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program
- Our company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader HR or engagement survey
- Our company conducts physical site visits and assessments
- Our company interviews management to assess ethical culture and employee perceptions
- Our company conducts a debrief and/or formal review following investigations that include culture of ethics as part of the analysis
- Our company reviews social media (e.g., Twitter, Facebook) or other websites that include feedback or comments about the company (e.g., Glassdoor.com) (please specify which sources) _____
- Our company's culture measurement uses a unique approach (please specify) _____
- Our company does not measure corporate ethical culture

Skip Logic: If "Our company does not measure corporate ethical culture" is selected for question 4G.1, the respondent will be directed to question 4H.1

4G.2 You have indicated that your company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program. For the remainder of this section, this survey will be referred to as the “Dedicated Culture Survey.”

What percentage of your total global workforce was offered the opportunity to participate in your company’s most recent Dedicated Culture Survey?

- 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

Question 4G.2 has been updated for 2017

Skip Logic: Question 4G.2 will be presented only if the answer to question 4G.1 is “Our company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program”

4G.3 You have indicated that your company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader HR or engagement survey. For the remainder of this section, this survey will be referred to as the “Engagement Survey.”

What percentage of your total global workforce was offered the opportunity to participate in your company’s most recent Engagement Survey?

- 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

Question 4G.3 has been updated for 2017

Skip Logic: Question 4G.3 will be presented only if the answer to question 4G.1 is “Our company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader HR or engagement survey”

4G.4 Of the employees who were provided the opportunity to respond to your most recent Dedicated Culture Survey, 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

Question 4G.4 is new for 2017

Skip Logic: Question 4G.4 will be presented only if the answer to question 4G.1 is “Our company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program”

4G.5 Of the employees who were provided the opportunity to respond to your most recent Engagement Survey, 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

Question 4G.5 is new for 2017

Skip Logic: Question 4G.5 will be presented only if the answer to question 4G.1 is “Our company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader HR or engagement survey”

4G.6 How frequently does your company administer the Dedicated Culture Survey?

- More frequently than annually
- Annually
- Every 18 months
- Every two years
- Every three years
- Less frequently than every three years
- Ad hoc or as desired

Question 4G.6 has been updated for 2017

Skip Logic: Question 4G.6 will be presented only if the answer to question 4G.1 is “Our company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program”

4G.7 How frequently does your company administer the Engagement Survey?

- More frequently than annually
- Annually
- Every 18 months
- Every two years
- Every three years
- Less frequently than every three years
- Ad hoc or as desired

Question 4G.7 has been updated for 2017

Skip Logic: Question 4G.7 will be presented only if the answer to question 4G.1 is “Our company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader HR or engagement survey”

4G.8 Indicate whether your company conducts the Dedicated Culture Survey using internal resources or a third party.

- Our company conducts the Dedicated Culture Survey internally without the assistance of a third party vendor or consultant
- Our company conducts the Dedicated Culture Survey with assistance from a third party vendor or consultant (e.g., for benchmarking) (please specify which third party)

- Our company primarily uses a third party to conduct the Dedicated Culture Survey (please specify which third party) _____

Question 4G.8 has been updated for 2017

Skip Logic: Question 4G.8 will be presented only if the answer to question 4G.1 is “Our company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program”

4G.9 Indicate whether your company conducts the Engagement Survey using internal resources or a third party.

- Our company conducts the Engagement Survey internally without the assistance of a third party vendor or consultant
- Our company conducts the Engagement Survey internally with assistance from a third party vendor or consultant (e.g., for benchmarking) (please specify which third party) _____
- Our company primarily uses a third party to conduct the Engagement Survey (please specify which third party) _____

Question 4G.9 has been updated for 2017

Skip Logic: Question 4G.9 will be presented only if the answer to question 4G.1 “Our company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader HR or engagement survey”

4G.10 Which topics are included in the Dedicated Culture 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 perception of the compliance and ethics function
- Employee’s perception of organizational justice (i.e., whether the company acts fairly)
- Employee’s perception of his or her peer environment and culture
- Employee’s perception of the effectiveness of the Code
- Employee’s perception of the effectiveness of policies
- Employee’s perception of the effectiveness of compliance training
- Whether the employee feels pressure to commit misconduct
- Whether the employee would recommend to a friend or family member that they take a job at the company
- Other topics (please specify) _____

Question 4G.10 has been updated for 2017

Skip Logic: Question 4G.10 will be presented only if the answer to question 4G.1 is “Our company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program”

4G.11 Which topics are included in your 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 perception of the compliance and ethics function
- Employee’s perception of organizational justice (i.e., whether the company acts fairly)
- Employee’s perception of his or her peer environment and culture
- Employee’s perception of the effectiveness of the Code
- Employee’s perception of the effectiveness of policies
- Employee’s perception of the effectiveness of compliance training
- Whether the employee feels pressure to commit misconduct
- Whether the employee would recommend to a friend or family member that they take a job at the company
- Other topics (please specify) _____

Question 4G.11 has been updated for 2017

Skip Logic: Question 4G.11 will be presented only if the answer to question 4G.1 is “Our company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader HR or engagement survey”

4G.12 Indicate which of the following results/feedback points, if any, are supported from your most recent Dedicated Culture Survey. Please select all that apply.

- All employees (regardless of seniority or other factors) are held accountable for unethical behavior or conduct
- Broad company perception that compliance and ethics is an important strategic function
- Employees report that they would be likely to report concerns and suspected misconduct
- Ethics and integrity decisions play a key role in business decisions
- Strong company support exists for the compliance and ethics initiatives
- Strong senior executive support exists for the compliance and ethics function
- Strong tone at the middle exists
- Strong tone from the top exists
- There is no pressure to meet business objectives at all costs

Question 4G.12 has been updated for 2017

Skip Logic: Question 4G.12 will be presented only if the answer to question 4G.1 is "Our company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program"

4G.13 Indicate which of the following results/feedback points, if any, are supported in your most recent Engagement Survey. Please select all that apply.

- All employees (regardless of seniority or other factors) are held accountable for unethical behavior or conduct
- Broad company perception that compliance and ethics is an important strategic function
- Employees report that they would be likely to report concerns and suspected misconduct
- Ethics and integrity decisions play a key role in business decisions
- Strong company support exists for the compliance and ethics initiatives
- Strong senior executive support exists for the compliance and ethics function
- Strong tone at the middle exists
- Strong tone from the top exists
- There is no pressure to meet business objectives at all costs

Question 4G.13 has been updated for 2017

Skip Logic: Question 4G.13 will be presented only if the answer to question 4G.1 is "Our company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader HR or engagement survey"

4G.14 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 assessment and/or

the compliance program. This includes how the culture survey or other results are used. Please limit your response to 500 characters.

This question requests an open-ended text response

Part 4H: Enforcement, Discipline and Incentives

4H.1 Does your company have a written misconduct investigation process?

- Yes
- No

4H.2 Indicate how your company tracks reported incidences of ethical misconduct (where allowed by law).

- The compliance and ethics function routinely tracks reports and related cases, regardless of how they were received
- Different functions or business units track different reports and related cases
- The compliance and ethics function routinely tracks reports received through the hotline or similar channels, but open door reports (such as those reported directly to a supervisor) are not normally tracked
- None of the above

4H.3 Indicate which of the following aspects, if any, apply to your company's non-retaliation policy. Please select all that apply.

- Specifies that report must be made in good faith
- Communicated in our company's Code of Conduct
- Communicated as a stand-alone policy
- Included in misconduct reporting messaging (e.g., in hotline info)
- Management is required to receive non-retaliation training
- Specifies that retaliation is against the law
- Non-retaliation statement is present in executive communications
- Include messaging at the end of an interview conducted as part of an investigation that the company does not tolerate retaliation
- Our company does not have a non-retaliation policy

4H.4 Indicate which established procedures your company has to protect employees who report suspected misconduct (this question applies to those employees who identify themselves when making the report). Please select all that apply.

- 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 report of 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)
- Other unique procedures to protect employees (please specify) _____
- None of the above

4H.5 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.

- Formal evaluation of ethical conduct as part of employee evaluations or annual performance reviews
- Formal evaluation of ethical business conduct as part of promotion decisions
- Formal component of manager bonus or other compensation determinations
- Culture Survey results are considered in manager promotion decisions
- Awards and recognitions showcasing ethical business conduct

Question 4H.5 has been updated for 2017

4H.6 The regulators, particularly the United States Department of Justice, have indicated they are interested in the mechanisms companies have to impose consequences on managers who were not actively engaged or aware of misconduct, but under whom misconduct occurred.

Please explain if your company has any such mechanisms. Please limit your response to 500 characters.

Question 4H.6 is new for 2017

This question requests an open-ended text response

4H.7 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 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 or concerned about potentially unethical events that were taking place at our company

4H.8 Please provide any additional commentary as it pertains to your company's compliance and ethics program you believe supports your questionnaire answers. Please limit your response to 500 characters.

This question requests an open-ended text response

Part 5: 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 measureable goals, accountability, and transparency.

5.1 Does your company conduct sustainability- and/or social responsibility-related initiatives?

- Yes
 No

Skip Logic: If “No” is selected for question 5.1, the respondent will be directed to question 5.19

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

	Chief Executive Officer (or similar role)	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"/>	<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"/>	<input type="checkbox"/>

Question 5.2 has been updated for 2017

5.3 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?

	At least monthly	Quarterly	Semi-annually	Annually	Every one to two years	Rarely or never
Sustainability-Related Communications or Briefings	<input type="checkbox"/>					
Social Responsibility-Related Communications or Briefings	<input type="checkbox"/>					

5.4 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"/>					
Social Responsibility-Related Communications or Briefings	<input type="checkbox"/>					

Question 5.4 has been updated for 2017

5.5 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
Personalized introduction to training regarding the importance of the company's sustainability & social responsibility initiatives	<input type="checkbox"/>	<input type="checkbox"/>
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 lead by senior leadership	<input type="checkbox"/>	<input type="checkbox"/>
Internal meetings involving senior leadership	<input type="checkbox"/>	<input type="checkbox"/>
Interactive Q&A forum, chat functionality	<input type="checkbox"/>	<input type="checkbox"/>
Sustainability & 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"/>

Question 5.5 has been updated for 2017

5.6 Has your company aligned sustainability and/or social responsibility with its core business and operations? If so, please explain how. Please limit your response to 1,000 characters.

This question requests an open-ended text response

5.7 How often does your company communicate with the following external stakeholders regarding sustainability performance and initiatives?

	At least quarterly	Twice per year	Annually	Every two years	Every three years	Every four or more years	We do not communicate such initiatives with this stakeholder group	Not applicable
Suppliers or vendors	<input type="checkbox"/>	<input type="checkbox"/>						
Clients or customers	<input type="checkbox"/>	<input type="checkbox"/>						
Non-governmental organizations or other activist groups	<input type="checkbox"/>	<input type="checkbox"/>						
General public or neighboring communities	<input type="checkbox"/>	<input type="checkbox"/>						
Media organizations	<input type="checkbox"/>	<input type="checkbox"/>						
Investors	<input type="checkbox"/>	<input type="checkbox"/>						
Elected Officials	<input type="checkbox"/>	<input type="checkbox"/>						
Regulators	<input type="checkbox"/>	<input type="checkbox"/>						
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>						

Question 5.7 has been updated for 2017

5.8 Please describe the process used to engage external stakeholders regarding sustainability performance and initiatives. Please limit your response to 1,000 characters.

This question requests an open-ended text response

5.9 How often does your company communicate with the following external stakeholders regarding social responsibility performance and initiatives?

	At least quarterly	Twice per year	Annually	Every two years	Every three years	Every four or more years	We do not communicate such initiatives with this stakeholder group	Not applicable
Suppliers or vendors	<input type="checkbox"/>	<input type="checkbox"/>						
Clients or customers	<input type="checkbox"/>	<input type="checkbox"/>						
Non-governmental organizations or other activist groups	<input type="checkbox"/>	<input type="checkbox"/>						
General public or neighboring communities	<input type="checkbox"/>	<input type="checkbox"/>						
Media organizations	<input type="checkbox"/>	<input type="checkbox"/>						
Investors	<input type="checkbox"/>	<input type="checkbox"/>						
Elected Officials	<input type="checkbox"/>	<input type="checkbox"/>						
Regulators	<input type="checkbox"/>	<input type="checkbox"/>						
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>						

Question 5.9 has been updated for 2017

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

- Yes
- No

Skip Logic: If "No" is selected for question 5.10, the respondent will be directed to question 5.13

5.11 Please explain how your company assesses or measures the effectiveness or impact of its sustainability and/or social responsibility initiatives. Please limit your response to 1,000 characters.

This question requests an open-ended text response

5.12 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

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

- No
- Yes, we produce a stand-alone Corporate Citizenship, Responsibility and Sustainability Report (“CSR Report”)
- Yes, we produce a stand-alone CSR Report and our CSR Report is publicly available
- Yes, we include such reporting as part of our annual report
- Yes, we maintain an interactive website that summarizes our CSR initiatives
- Yes, while we don’t maintain an interactive website that summarizes our CSR initiatives, we do include information regarding such initiatives on our website.
- Yes, and our reporting adheres to GRI Sustainability Reporting Guidelines
- Yes, but we do not report on CSR initiatives in a CSR Report, rather our reporting is contained in a unique report (Please provide the title of the report) _____

Question 5.13 has been updated for 2017

Skip Logic: *If “No” is selected for question 5.13, the respondent will be directed to question 5.17*

5.14 How often is your CSR Report or other report regarding your company's CSR initiatives (as discussed in question 5.13) produced?

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

Question 5.14 has been updated for 2017

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

This question requires a numeric response

5.16 Was your company's most recent CSR Report or other report regarding your company's CSR initiatives assured or audited?

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

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

- Greenhouse Gas (GHG) emission data
- Triple Bottom Line (TBL) accounting
- Life-cycle assessments
- ISO 14000 standards
- 5 Level Framework (5LF)
- Sustainability Management System (SMS)
- Other type of environmental performance measurement (Please specify)

- Our company doesn't quantitatively assess environmental performance

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

- Sustainability Policy/Code of Conduct for Suppliers
- Sustainable Purchasing Policy
- Lifecycle Based Purchasing Program
- Supplier Sustainability Questionnaire
- Supplier Sustainability Audits
- Third Party Audits for Supply Chain Sustainability
- Other (Please specify) _____

5.19 Does your company require its third parties to have a formal sustainability or social responsibility policy?

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

5.20 Select the following sustainability programs/initiatives your company has in place. For each program/initiative selected, briefly describe your company's current goal(s):

- GHG Reduction _____
- Energy Reduction _____
- Water Reduction _____
- Waste Reduction _____
- Lifecycle Impact Reduction _____
- Employee Engagement _____
- Sustainable Purchasing _____
- Sustainable Risk Management _____
- Climate Change _____

5.21 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

5.22 What are your key sustainability accomplishments over the previous 12 months? Please describe below and provide any supporting documentation. Please limit your response to 1,000 characters.

This question requests an open-ended text response

5.23 Does your company adhere to the United Nations' Guiding Principles on Business and Human Rights?

- Yes
- No
- Not sure

5.24 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 401k)
- 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 or 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)
- Wellness programs, including physical and mental health programs
- Workforce training, skills, and leadership development programs
- Other unique initiatives (Please specify) _____

5.25 Indicate which category your company's most recent Carbon Disclosure Performance Score falls within. More information on Carbon Disclosure Performance Scores can be found at www.cdp.net

- My company is not currently rated by the Carbon Disclosure Project
- A
- B
- C
- D
- E
- Not sure

5.26 Indicate which category your company's most recent Carbon Disclosure Leadership Index falls within. More information on the Carbon Disclosure Leadership Index can be found at www.cdp.net

- My company is not currently rated by the Carbon Disclosure Project
- 90 or above
- 80-89
- 70-79
- 60-69
- 50-59
- 30-49
- Less than 30
- Not sure

5.27 Does your company have a formal community involvement strategy?

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

5.28 Select which initiatives your company is currently participating in or a member of. Please select all that apply.

- UN Global Compact
- World Economic Forum's Partnering Against Corruption Initiative (PACI)
- World Economic Forum's Climate Change Initiative
- World Economic Forum's Corporate Global Citizenship Initiative
- World Business Council for Sustainable Development
- The Copenhagen Communiqué
- Transparency International
- UN Global Initiative to Prevent Human Trafficking
- GRI Organizational Stakeholder Program
- Global Roundtable on Climate Change
- Carbon Disclosure Project
- White House Climate Change Pledge
- U.S. Environmental Protection Agency programs (e.g., Climate Leaders, Green Power partnership, National Partnership for Environmental Priorities)
- Other industry-specific, local, national or international initiatives (Please specify)

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

- Set specific goals for community involvement
- Use key performance indicators (KPIs) to measure progress towards community involvement goals
- Evaluate business decisions in the context of societal impact

Question 5.29 has been updated for 2017

5.30 In what ways do you 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 serve on the boards of charitable organizations
- Facilitating donation drives, (e.g., clothing, food, etc.)
- Other unique or innovative ways (please specify and support with documentation)

Question 5.30 has been updated for 2017

5.31 Please provide any additional commentary as it pertains to your company's CSR or Sustainability programs you believe supports your questionnaire answers. Please limit your response to 500 characters.

This question requests an open-ended text response

Part 6: Leadership, Innovation & Reputation

Leadership, Innovation & Reputation measures a company's legal compliance, litigation and ethical track record, along with the strength of the company's ethical reputation in the market place. While we take into account 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.

6.1 Has your company earned any of the following media recognitions in 2014, 2015 or 2016? Please select all that apply.

- Fortune: 100 Best Companies to Work For
- Fortune: World's Most Admired Companies
- Fortune: Change the World
- Newsweek: Green Rankings (note: top 50 overall or within the top 10 for your industry)
- Barron's: World's Most Respected Companies
- Working Mother: 100 Best Companies
- Forbes: 100 Most Trustworthy Companies
- Reputation Institute: Global RepTrak[®] 100
- Diversity MBA: Top 50 Companies for Diverse Managers to Work
- Diversity Inc.: Top 50 Companies for Diversity
- Directorship Magazine: Boardroom Leaders
- Corporate Responsibility Magazine: CR's 100 Best Corporate Citizens List
- Other Media Recognitions (Please specify) _____

Question 6.1 has been updated for 2017

6.2 Has your company earned any of the following awards or recognitions in the past two years?

Please select all that apply.

- Better Business Bureau: Torch Award and/or Integrity Award
- Malcolm Baldrige National Quality Award
- Corporate Register: Corporate Responsibility Reporting Award
- Corporate Knights: Global 100
- J.D. Power and Associates award(s) and/or certification; please specify which J.D. Power and Associates Award(s) _____
- U.S. EPA Energy Star: Partner of the Year
- U.S. EPA Climate Leadership Awards
- Human Rights Campaign: Best Places to Work for LGBT Equality
- Interbrand: Best Global Green Brands
- The Civic 50
- B Corp: Best for the World
- Other Awards or Recognitions (please specify) _____

6.3 Is your company currently featured by 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 (please specify) _____

Skip Logic: Question 6.3 will only be presented if the answer to question 2.4 is "Public company"

6.4 Is your company (or any employees or directors) a founding member and/or an actively participating member (e.g., attending events, involvement in initiatives) of the following groups? Please select all that apply.

	Participating Member	Founding Member
Ethics and Compliance Initiative	<input type="checkbox"/>	<input type="checkbox"/>
Practicing Law Institute	<input type="checkbox"/>	<input type="checkbox"/>
Society of Corporate Compliance and Ethics	<input type="checkbox"/>	<input type="checkbox"/>
Business Roundtable	<input type="checkbox"/>	<input type="checkbox"/>
World Business Council for Sustainable Development	<input type="checkbox"/>	<input type="checkbox"/>
The World Economic Forum (WEF)	<input type="checkbox"/>	<input type="checkbox"/>
International Corporate Governance Network	<input type="checkbox"/>	<input type="checkbox"/>
Better Business Bureau	<input type="checkbox"/>	<input type="checkbox"/>
United Nations Global Compact	<input type="checkbox"/>	<input type="checkbox"/>
The Sustainability Consortium	<input type="checkbox"/>	<input type="checkbox"/>
Business for Social Responsibility	<input type="checkbox"/>	<input type="checkbox"/>
National Association of Corporate Directors	<input type="checkbox"/>	<input type="checkbox"/>
Sustainable Purchasing Leadership Council	<input type="checkbox"/>	<input type="checkbox"/>
White House Climate Change Pledge	<input type="checkbox"/>	<input type="checkbox"/>
Society of Corporate Secretaries and Governance Professionals	<input type="checkbox"/>	<input type="checkbox"/>
Other (e.g., industry groups) (Please specify)	<input type="checkbox"/>	<input type="checkbox"/>

Question 6.4 has been updated for 2017

6.5 Has a member of the company's senior leadership team (C-suite) spoken at any of the following conferences or events in the past two years? It could be a keynote speech or appearance on a panel. Please select all that apply.

- Business for Social Responsibility Conference
- Coalition for Environmentally Responsible Economies (CERES) Conference
- Clinton Global Initiative
- Fortune Brainstorm E
- Fortune Global Forum
- Fortune Most Powerful Women Summit
- Milken Institute Global Conference
- Net Impact
- The Economist Innovation Forum
- GreenBiz
- Stanford Directors' College
- Sustainable Brands
- USGBC GreenBuild
- The New York Times Cities for Tomorrow Conference
- The Wall Street Journal CEO Council
- The Wall Street Journal WSJ ECO:NOMICS
- World Economic Forum (WEF) at Davos
- Other (e.g., academic forums such as at Boston College Center for Corporate Citizenship)
(Please specify) _____

Question 6.5 has been updated for 2017

6.6 How many conferences or events specific to your company's industry have the following senior leaders spoken at in the past two years? Note that this could include a keynote speech or appearance on a panel.

- Chief Executive Officer (or similar title) _____
- Chief Ethics & Compliance Officer (or senior-most leader of your compliance and ethics department) _____
- Chief Sustainability Officer (or senior-most leader of your corporate social responsibility program) _____
- General Counsel (or senior-most leader of your legal department) _____

Question 6.6 has been updated for 2017

6.7 Have individuals in the following leadership positions ever held the top position at an industry association? Please select all that apply, and please specify which association(s) in the space provided.

- Chief Executive Officer (or similar title) _____
- Chief Ethics & Compliance Officer (or senior-most leader of your compliance and ethics department) _____
- Chief Sustainability Officer (or senior-most leader of your corporate social responsibility program) _____
- General Counsel (or senior-most leader of your legal department) _____
- Chief Communications Officer (or similar title) _____

Question 6.7 has been updated for 2017

6.8 Please indicate the ways in which your company periodically (at least annually) measures its reputation. For those methods selected, please provide documentation that demonstrates how reputation is tracked and/or how the company is perceived. Please select all that apply.

- Media monitoring (including social media)
- Quantitative surveys (either internal or external)
- Qualitative focus groups (either internal or external)
- Competitor or peer review
- Number of awards received
- Ranking on “best of” lists
- Employee survey feedback
- Customer feedback
- Net Promoter Score (Please specify your average NPS score over the previous two years)

- Online commentary from external stakeholders, such as customers on product review websites
- Online commentary from internal stakeholders, such as employees (e.g., Glassdoor.com)
- Volume of leadership speaking engagements (including invitations that are declined)
- Volume of job applicants
- Gender or diversity assessment
- Summaries or analysis of exit interviews
- Other (Please specify) _____
- My company does not measure or track reputation metrics

Question 6.8 has been updated for 2017

6.9 Please rate how you believe the following stakeholder groups perceive your industry's overall reputation.

	Excellent	Very Good	Good	Fair	Poor	Not Sure/Does Not Apply
Customers (current or past)	<input type="checkbox"/>					
Employees	<input type="checkbox"/>					
National media	<input type="checkbox"/>					
General public/neighboring communities	<input type="checkbox"/>					
Suppliers and vendors	<input type="checkbox"/>					
Government and regulators	<input type="checkbox"/>					
Non-governmental organizations or activist groups	<input type="checkbox"/>					
The financial community or investors	<input type="checkbox"/>					
Local or regional media outlets	<input type="checkbox"/>					
Online influencers, such as bloggers or industry experts	<input type="checkbox"/>					

6.10 Please rate how your company perceives the company's overall reputation with each of the following stakeholder groups. Please support your answers with any available documentation.

	Excellent	Very Good	Good	Fair	Poor	Not Sure/Does Not Apply
Customers (current or past)	<input type="checkbox"/>					
Employees	<input type="checkbox"/>					
National media	<input type="checkbox"/>					
General public/neighboring communities	<input type="checkbox"/>					
Suppliers and vendors	<input type="checkbox"/>					
Government and regulators	<input type="checkbox"/>					
Non-governmental organizations or activist groups	<input type="checkbox"/>					
The financial community or investors	<input type="checkbox"/>					
Local or regional media outlets	<input type="checkbox"/>					
Online influencers, such as bloggers or industry experts	<input type="checkbox"/>					

6.11 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 law suit which was not finally adjudicated in company's favor. Such adjudication does NOT include voluntary dismissal pursuant to a settlement agreement.
- Defendant in an antitrust law suit which was not finally adjudicated in 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 law suit or antitrust law suit which was not finally adjudicated in company's favor. Such adjudication does NOT include voluntary dismissal pursuant to a settlement agreement.
- Defendant in a law suit alleging retaliation against a whistleblower which was not finally adjudicated in 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 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

Question 6.11 has been updated for 2017

Skip Logic: *If "None of the above" is selected OR if no answers are selected for question 6.11, the respondent will be directed to question 6.13*

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

This question requests an open-ended text response

6.13 Please provide any additional commentary as it pertains to your company's position as a leader in developing ethical business practices, new or innovative ethics-related initiatives, or that demonstrates your company's positive ethical reputation. Please limit your response to 500 characters.

This question requests an open-ended text response

Part 7: Conclusion

Thank you for participating in the Ethisphere Institute's 2017 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