

# How to conduct assessments on integrity

GROUP	LEVEL AND NAME	LEVEL CHARACTERISTICS	EXAMPLES OF CONDUCT	LEVEL AND NAME	LEVEL CHARACTERISTICS	EXAMPLES OF CONDUCT	GROUP	
ETHICAL LEADERS	<b>10</b> Ethical Hero(ine)	<ul style="list-style-type: none"> <li>Ethical leadership</li> <li>Instils ethical approach in others</li> <li>Very supportive of the compliance function</li> <li>Will have the compliance function sit on their leadership team and be a significant business partner</li> <li>Has strong morals and a high level of personal integrity</li> </ul>	<ul style="list-style-type: none"> <li>Leads discussions on integrity and ethics</li> <li>Has made calls to walk away from business due to integrity issues</li> </ul>	<b>5</b> The Fencesitter	<ul style="list-style-type: none"> <li>Their ethical behaviour could go either way, depending on what is best for them; tends to change based on the day or week</li> <li>Would be unethical if it was proposed to them</li> <li>Would not go and seek out unethical behaviour but would certainly take it when presented</li> </ul>	<ul style="list-style-type: none"> <li>Generally a long-term employee of the company</li> <li>When no one is watching does whatever they want to do</li> <li>Generally acts very polite and watches others to gauge where they stand</li> </ul>	GO-BETWEENERS (CONT.)	
	<b>9</b> The Statesman	<ul style="list-style-type: none"> <li>Strong ethics</li> <li>Will report issues</li> <li>Will walk the walk and talk the talk on ethics</li> <li>Has strong integrity and exercises personal integrity</li> <li>Will always engage the compliance function, but keeps them at a slight distance</li> </ul>	<ul style="list-style-type: none"> <li>Not only puts up with compliance rules but publicly supports them</li> <li>Relies on the compliance team to make changes as they see fit</li> <li>Uses personal examples to get the message across</li> </ul>		<b>4</b> The Silent Witness	<ul style="list-style-type: none"> <li>Benefits from being unethical</li> <li>Takes advantage of unethical business practices; doesn't develop them or lead them but certainly turns a blind eye to the behaviour</li> <li>Would never admit to being involved in any unethical conduct</li> <li>Will never be the ringleader but would certainly get the advantage and remain totally silent</li> <li>Generally a long-term employee</li> </ul>		<ul style="list-style-type: none"> <li>Ignores compliance</li> <li>Goes with the flow and doesn't change illegal practices if they benefit from them</li> <li>Takes advantage of loopholes and turns a blind eye to issues</li> <li>Acts completely innocent but knows exactly what is going on</li> <li>Answers questions precisely and never offers up more than absolutely necessary</li> <li>Never asks questions at training sessions, just smiles to themself and leaves</li> </ul>
	<b>8</b> The Walker	<ul style="list-style-type: none"> <li>Trustworthy</li> <li>Wants to do it the right way</li> <li>Will always talk about ethics and integrity but will occasionally question whether they really get people ahead</li> <li>A valuable team player when it comes to integrity and will raise ethical issues to the compliance function when they see them</li> <li>Will engage the compliance function when they need to but definitely on "I'll call you" terms</li> </ul>	<ul style="list-style-type: none"> <li>Spreads the word to support integrity and compliance</li> <li>Pushes to change policies and procedures that are not directly supporting the business to make them smarter, better and fairer</li> </ul>			<b>3</b> The Trouble Seeker		<ul style="list-style-type: none"> <li>Wants to get in the game</li> <li>A little naïve but wants to play with the gang members</li> <li>Not the ringleader but will happily go along with unethical behaviour when asked to do so</li> <li>Looks for ways to get deals done and find an advantage</li> <li>Generally only stays a short term in the company as nerves push them out</li> </ul>
GO-BETWEENERS	<b>7</b> The Actor	<ul style="list-style-type: none"> <li>Talks a good game</li> <li>Says they support compliance but doesn't invite the compliance function to their meetings</li> <li>Acts as though compliance is key but will work behind the compliance team's backs to make things harder</li> <li>Won't go out of their way to do things, but will always act as though compliance and integrity are key to their success</li> <li>Most people think this person is a great ethical person and full of integrity but the compliance function knows better</li> </ul>	<ul style="list-style-type: none"> <li>Says all the right things when management are around but goes back to a more relaxed state as soon as they leave</li> </ul>	<b>2</b> The Gang Member	<ul style="list-style-type: none"> <li>Recruits others to be unethical and is always looking to recruit new people to share the risk around</li> <li>Tends to stay in the company to watch other, less-experienced fraudsters be investigated</li> </ul>		<ul style="list-style-type: none"> <li>Takes advantage of other people and their shortfalls</li> <li>Works in pairs and teams to defraud and misrepresent</li> <li>Unlikely to appear in ethics/integrity training; in the rare event that they do they will spend the time trying to crack jokes and generally trying to derail the training</li> </ul>	LOW RANGERS
	<b>6</b> The Big Talker	<ul style="list-style-type: none"> <li>An excellent parrot of corporate "fluff" and ethical buzz words, but knows how to break the rules and would do so if the opportunity arose</li> <li>Always uses the corporate examples of integrity, but would never create anything themselves</li> <li>Could fall below the line and be fraudulent quite easily if the opportunity arose</li> </ul>	<ul style="list-style-type: none"> <li>Says all the right things, then says the opposite in their focal language</li> <li>Uses the "We don't want to go to jail" story too often</li> <li>Repeats predefined messages from compliance</li> </ul>		<b>1</b> The Jail Bird	<ul style="list-style-type: none"> <li>Totally unethical</li> <li>Always looking for a deal</li> <li>A total "bad egg" that will end up in jail</li> </ul>	<ul style="list-style-type: none"> <li>Cuts out another person to make more money</li> <li>Lies, cheats and misrepresents to make money</li> <li>Won't turn up to training because they are "too busy"</li> </ul>	