

The background of the slide features a large, faint watermark of the Rutgers University seal. The seal is circular and contains the text "RUTGERS UNIVERSITY" around the perimeter and "1773" at the bottom. The seal is centered behind the text.

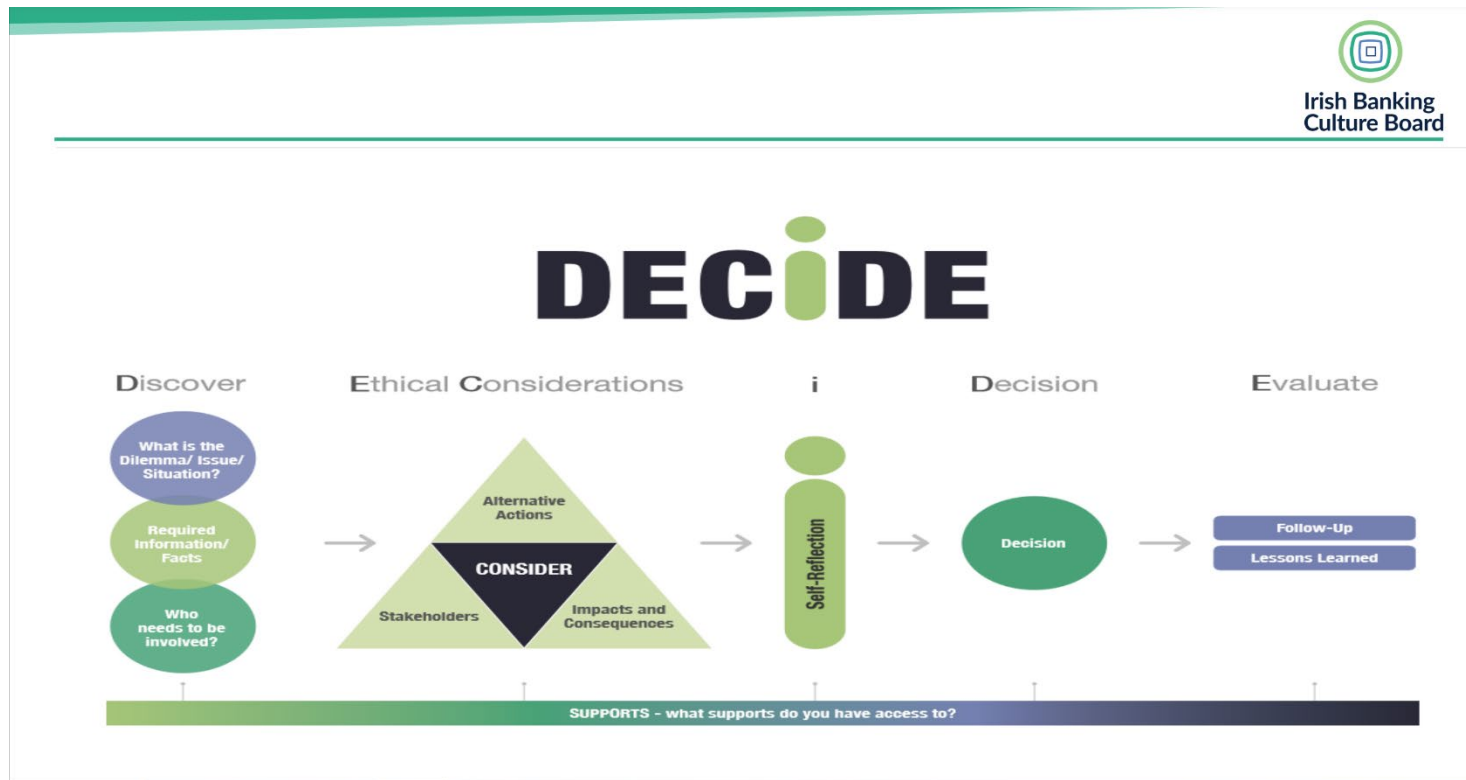
RUTGERS

Rutgers Business School
Newark and New Brunswick

Corporate Ethical Decision-Making Frameworks

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Earlier this year we learned about the *Irish Banking Culture Board's* Ethical Decision-Making Framework



Businesses vary in their guidance on how to approach ethical dilemmas (*Warren et al., 2015*)

TONE AT THE BOTTOM	TONE AT ONE TOP	MULTI-TONE
<p style="text-align: center;">Identify dilemma</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Discuss issue with peers or immediate supervisor</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">If not resolved, pursue issue with next level of management</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Continue raising issue through the levels of the organization</p>	<p style="text-align: center;">Identify dilemma</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Consult with top management or consider the co.'s core values and standards</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Consider what your supervisor thinks is the right thing to do</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Consider what your coworkers think is the right thing to do</p>	<p style="text-align: center;">Identify dilemma</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Identify the organizations involved in the dilemma and the tone set by the leaders of the organizations</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Determine which organization is most extensive and has the most well-defined norms</p> <p style="text-align: center;">↓</p> <p style="text-align: center;">Priority should be given to the most extensive organization with the most well-defined norms and to decisions that avoid significant adverse effects to humans and communities</p>

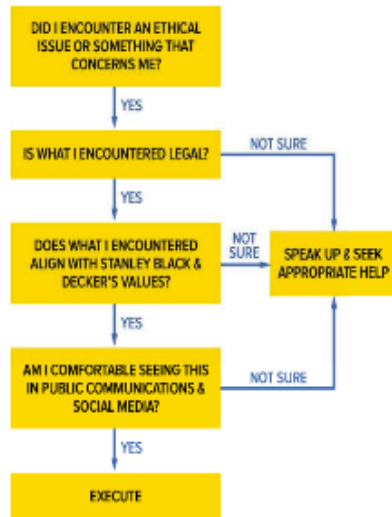
Figure 1: Reconciliation Processes for Organizational Ethical Dilemmas.

Examples of Current Ethics Frameworks....

Ethical Decision-Making Frameworks

Stanley Black & Decker

This Ethical Decision Making model can help you think through a dilemma.



Some decisions are tough, but we are here to help. If you are still not sure, use the following resources to resolve your concern:

- Our written policies and procedures
- Your manager or a leader in your Business Unit
- Your local Human Resources representative
- Your local Legal Department
- Integrity@SBD (see end of this Code)

All employees should feel empowered to raise concerns, suspected violations or unethical behavior. If it doesn't feel right, talk to someone. **We will protect you from retaliation** for expressing good-faith concerns professionally, honestly and fairly.

Bank of America

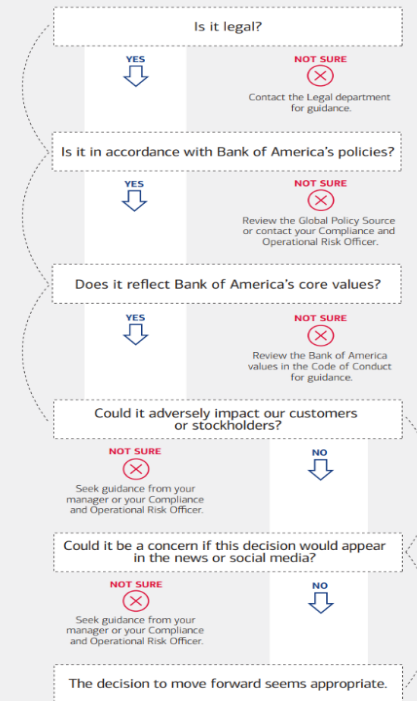
We honor our Code

Making good, responsible decisions

Every decision we make as an institution and as employees has the potential to impact not only the company and our teammates, but our customers, clients, shareholders and communities as well. We all strive to make good, responsible decisions and to do the right thing. However, making decisions is not always easy. Keep the following in mind to help you make informed, thoughtful decisions:

- Make sure you have the relevant facts.
- Take into account relevant laws, rules, regulations and policies.
- Consider competing interests.
- Identify potential options and their consequences.
- Uphold Bank of America values.

Ethical decision-making tree



Ethical Decision-Making Frameworks

Accenture

MAKING GOOD DECISIONS

Not every issue that comes up has a clear path to resolution. In difficult situations use judgment and involve others to help make good decisions.

HOW-TO

Making Good Decisions

Unsure about any conduct or decision? Ask the following questions:

- **Obligations under the law** - Could it be against the law?
- **Obligations to Accenture** - Could it violate our core values, Code of Business Ethics or policies?
- **Obligations to others** - Could it breach an obligation to a client or other business partner (for example, contracts or client codes of conduct or policies)?
- **Do no harm** - Could it cause harm to any person, our individual reputations or Accenture's brand, reputation, financial performance or business relationships?

If the answer is "yes" to any of the questions above—don't do it.

If unsure, ask a supervisor, career counselor, any Accenture Leader, Human Resources or Legal. If uncomfortable asking a question or raising a concern via these channels, use the Accenture Business Ethics Helpline.

Ventas

Resolving Business Ethics Concerns

In addition to complying with all legal requirements, you must adhere to the overriding ethical and professional standards that govern the conduct of our business. Ventas's interests are not served by any unethical practice or activity, even though such practice or activity may not be in technical violation of the law. In addition, we may have policies and practices that require more of you than is required by this Code. In those instances, you must follow the more restrictive policy or practice. You should consider the standards set forth herein as a baseline, or a minimum requirement, that must always be followed.

Please understand that every situation you may face cannot be contemplated or specifically addressed in this Code. At times you may find yourself in a situation at work where the right decision may not be clear. If that happens, ask yourself the following questions:

- Is my contemplated action legal?
- Is my contemplated action honest and fair?
- Is my contemplated action consistent with Company policies and values, including the principles of this Code?
- Does this decision or action make me uncomfortable?
- Will my action or decision embarrass me or harm the Company's reputation?

If, after answering these questions, you feel uncomfortable about a situation or are concerned that it may be illegal, unethical or inappropriate, or if you are uncertain as to whether your action or decision is prohibited by this Code, do one or more of the following options:

- Consider the steps you can take to try to remedy the situation. If possible, discuss your concern with the person(s) involved.
- Try to resolve your concern with your manager or executive team leader.
- For employment-related issues, such as questions or concerns about potential discrimination or harassment, contact the Human Resources Department.
- For questions about laws and regulations that may apply to our business, contact the Legal Department.
- For questions about finance or accounting issues, contact the Accounting Department.
- In addition to the above options, you may utilize one or more of the following compliance resources:

Ethical Decision-Making Frameworks

Citi

1. Is it in the client's best interests?

We put our clients' interests first in everything we do.

2. Does it create economic value?

We create economic value by providing financial products, services, and advice that help individuals, organizations, and communities grow and prosper.

3. Is it systemically responsible?

We hold ourselves accountable and take actions that reduce undue risk to our organization, our clients, our communities, and to the broader financial services industry.

4. Does it comply with the law, regulation, Citi policies, and our Code of Conduct?

We consider both the letter and spirit of each and put our values into action.

5. Would it cause harm to Citi's or your reputation?

We take actions based on a thorough understanding of the risks involved and act with due care, diligence, and skill.

6. Would it result in even the appearance of a conflict of interest or impropriety?

We avoid situations where personal interests appear to be in opposition to Citi's interests or the interests of our clients.

7. Would you feel comfortable if it was made public?

We are fair, honest, transparent, and accountable for our actions.



Ball Corporation

NOT SURE WHAT TO DO? TAKE THIS QUIZ

All employees should use their best judgment and must conduct the business affairs of Ball in a lawful and ethical manner. Ask yourself the following questions when you are unsure of how you should act or behave in a particular situation:

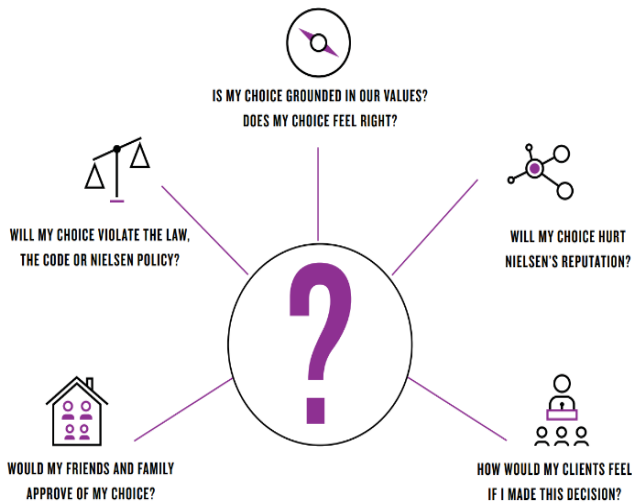


You should be able to answer all of these questions with a clear "yes." If you cannot, you should speak with your manager, your human resources representative or the Compliance Alliance before moving forward with the action. If you are unsure, seek guidance.

Ethical Decision-Making Frameworks

The Nielsen Co.

IF YOU ARE FACED WITH A CHOICE AND DON'T KNOW THE RIGHT THING TO DO,
ASK YOURSELF SOME BASIC QUESTIONS:



IF YOU HAVE ANY DOUBTS ABOUT WHAT TO DO, SEEK ADVICE FROM
YOUR COMPLIANCE & INTEGRITY LEADER.

Kellogg

Making Decisions the Kellogg Way

How we make a decision says as much about who we are as a company as the decision itself. It is important to make decisions we can be proud of. Such decisions lead to behaviors that are legal, ethical and responsible.

Use this Decision Tool to navigate the gray areas of business and ensure we make the best choices.

CAN	We Do It? Is it permitted by Law?
 Not Sure? <ul style="list-style-type: none"> • Consult with others • Contact Legal forguidance 	 No <ul style="list-style-type: none"> • Don't Do It
Yes	
SHOULD	We Do It? Is it ethical and consistent with our K Values, our Code and company
 Not Sure? <ul style="list-style-type: none"> • Consult with others • Contact myHR, local HR or the Office of Ethics and Compliance for guidance 	 No <ul style="list-style-type: none"> • Don't Do It
Yes	
HOW	Do We Do It? Will it enhance our culture and reputation and benefit our stakeholders?
 Not Sure? <ul style="list-style-type: none"> • Consult with others • Discuss with your manager for guidance 	 No <ul style="list-style-type: none"> • Don't Do It
Yes	
<ul style="list-style-type: none"> • Proceed with Confidence 	

Ethical Decision-Making Frameworks

Xerox

ETHICAL DECISION-MAKING FRAMEWORK

You should assess the following criteria to determine whether a specific behavior or activity is appropriate:

1. **Company Policy.** Does the action comply with Xerox policies and applicable law?
2. **Core Values.** Does it align with our Core Values?
3. **Common sense.** Generally speaking, the appropriateness of a practice or activity should be guided by common sense and sound business judgment.
4. **Public scrutiny.** Take the public scrutiny test: If you wouldn't want to read about your action on the front page of your local newspaper, don't do it.
5. **When in doubt, ask!** Your manager, Human Resources and the Ethics Office and Helpline are available to help you do the right thing. See the *Additional Resources* section for more

Merck

When faced with a challenge, these questions can help you decide what you should do.



Ask yourself...

- » Could my conduct or decision harm anyone or anything?
- » Will my conduct violate the trust of customers, patients, shareholders or other stakeholders?
- » Am I willing to be held accountable for this action and for its consequences?
- » Do I know for certain that my proposed action is consistent with the letter and spirit of our company policies, as well as applicable laws and regulations?

Ethical Decision-Making Frameworks

RADAR: A framework for deciding the right thing to do

- Report your concerns to appropriate resources (e.g., ethics teams, OGC, R&Q, HC) as necessary.
- Communicate your concerns and rationale to the relevant stakeholders, as appropriate.
- Reflect on what you have learned and whether anything needs to change.

Reporting and communicating

- Test your decision—does it feel right? Can you sleep at night?
- Would you be embarrassed if others knew what you did, or did not do?
- Reflect on what a reasonable person would think.
- Consult again, if necessary.
- Act when you are confident with your decision, and always in good faith.

Agreeing the way forward

Recognising the event

- Is the situation consistent with the PwC Purpose and values?
- Are you being asked to do something which you think is wrong, against the PwC Purpose or our values?
- Are you aware of others' unethical or illegal behaviour (e.g., colleagues, clients, suppliers and other parties)?
- Are you trying to make a decision but are unsure of the ethical implications?
- What if it was reported in the media?



Assessing the situation

Who is affected?

- You?
- A colleague/your team?
- PwC—your firm or the network?
- Your client/a client?
- Other third parties?

What are the guiding parameters?

- Does it feel right?
- The law—is it legal?
- Regulation/professional standards.
- PwC standards and policies.
- Client reactions.
- Wider third party reactions.
- PwC Purpose.
- PwC values.

- What are the options?
- What are the likely results of each option?
- Is there an alternative solution that does not pose an ethical conflict?
- Consult as appropriate.
- Make a decision on what to do.

Discussion Questions

- Does your organization have an Ethical Decision-Making Framework?
 - If so, how does your bank encourage employees to use the framework?
- Would it help to have an EIF Ethical Decision-Making Framework?
- In general, what are the hurdles to implementing an Ethical Decision-Making Framework?

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