



IN PARTNERSHIP WITH



BELA ASIA PACIFIC RESEARCH REPORT: TRENDS IN CULTURE, BULLYING, AND HARASSMENT

Driven by leaders from Johnson Controls, Nokia, and EY, this report captures emerging practices across Asia Pacific in the following areas: measuring culture, misconduct, bullying and harassment, investigations, cybersecurity, and much more. This report also shares exclusive leadership insights from the BELA Asia Pacific community.

THANK YOU TO OUR BELA ASIA PACIFIC COMMUNITY

3M

amazon



BOEING

Coca-Cola



DIAGEO



glenmark
A new way for a new world



Honeywell



Johnson
Controls 

 **Kimberly-Clark**

KKR

Marriott
INTERNATIONAL

 Microsoft

NOKIA

VISA

 **MEGA**
COMPLIANCE


PRUDENTIAL

 salesforce


SNC • LAVALIN

Uber

CONNOR
SOURCING THE FUTURE



Western Digital.

ABOUT BELA ASIA PACIFIC CHAPTER



In partnership with Ethisphere's Business Ethics Leadership Alliance (BELA), a globally recognized community of 340+ leading multinational companies, the BELA Asia Pacific Chapter, co-chaired with William E. Connor & Associates and Omega Compliance, provides leading companies with on-demand data, in-depth research, expert guidance, and networking opportunities that will ensure they have the tools they need to implement a best-in-class ethics and compliance program and support a strong culture of integrity.

BELA Asia Pacific members have access to a dedicated member hub, a series of closed-door, in-depth roundtable discussions, snap polls, data, and workshops with senior executives on topical issues across the region.

To learn more, contact
Stefan Linssen, EVP, Ethisphere
Stefan.Linssen@Ethisphere.com

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W E L C O M E

Dear BELA Member,

We are delighted to release our first Business Ethics Leadership Alliance (BELA) Asia Pacific Survey and Report: Trends in Culture, Bullying, and Harassment. This survey, you may recall, was launched under the direction of the BELA Asia Pacific community and a dedicated working group comprised of leaders from Johnson Controls, Nokia, and EY.

This report covers five critical areas:

1. Measuring culture
2. Tracking ethical misconduct
3. Bullying and harassment claims
4. Investigations
5. Creating a culture of cybersecurity

In addition to the data provided, we have featured a variety of “spotlight” conversations highlighting the shared expertise of leaders across APAC.

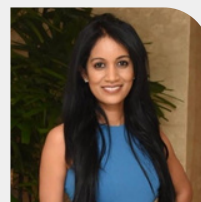
One key finding is the struggle among companies to measure culture in a virtual or hybrid setting. Another high-level finding is that leaders prioritize collecting data that illustrates employee sentiment, or how they feel about their organization and that unreliable data is an inhibitor for telling the full story.

In the pages of this report, you will find practical resources, peer insights, and examples, combined with our 2021 World’s Most Ethical Companies® data set for Asia Pacific. This report also includes research that will promote the advancement of your compliance program. With the support of our tight-knit and committed Asia Pacific community, Ethisphere continues to be a proud partner in each of these efforts and the influence that this community has in making a difference each day. As always, please contact us with any questions or feedback.



Erica Salmon Byrne, J.D.

**Executive Vice President and
Chair of the Business Ethics
Leadership Alliance (BELA)**



Aarti Maharaj, M.A.

**Managing Director, Asia
Pacific**

THANK YOU TO THE BELA ASIA PACIFIC WORKING COMMITTEE

A common challenge identified by the community over the course of the previous year was a lack of meaningful benchmarks and data associated with Asia Pacific—specifically around measuring culture and integrity program practices. In an effort to address this growing need for data, we assembled an expert working committee of leaders to guide and direct the contents of this survey and report.

We would like to take this opportunity to thank and recognize the following leaders for their unwavering support and commitment to raising the standard of ethical business practices across Asia.



Mona Dange

Global Head, Regional & Business Group Compliance, Nokia



Sonali Narasimhan

Regional Head of Compliance, Asia Pacific, Johnson Controls



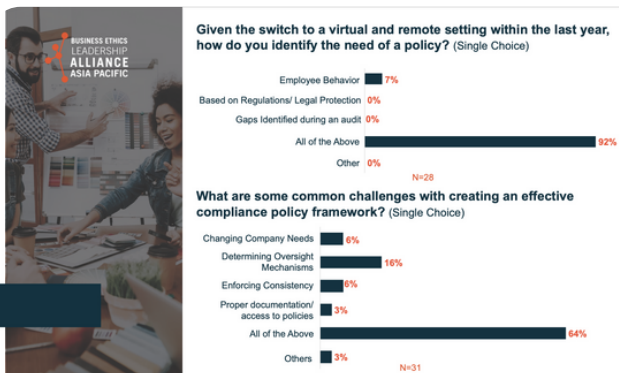
Ramesh Moosa

Forensic & Integrity Services Leader, ASEAN & Singapore, EY

UNLOCK THE COMPLETE DATA SET ON THE BELA APAC MEMBER HUB

We have compiled the data highlighted throughout this report into a downloadable PDF for your use. All data and insights are hosted on the BELA Asia Pacific Member Hub. These downloadable files can be used in presentations, as part of training materials, or to as a way to inform your conversations. BELA member companies have mentioned using our data in external activities such as speaking engagements. Each button will take you to a specific data set, highlighted below:

- 2021 BELA Asia Pacific Survey Data and Questions
- 2021 World's Most Ethical Companies (WMEC) data set on culture for Asia Pacific
- Quarterly BELA APAC roundtable snap polls over the past year (2020-2021)



[BELA Asia Pacific Survey Findings](#)

[2021 WMEC Data Set on Culture \(APAC\)](#)

[BELA APAC Roundtable Snap Polls](#)



SECTION 1

MEASURING CULTURE ACROSS ASIA PACIFIC

PRUDENTIAL ASSURANCE COMPANY

We rely on surveys because they allow us to collect measurable data. Every year, we run a dedicated **Ethical Culture survey**. We also have a Group Engagement survey that evaluates our **organisation's culture** and a Risk Culture survey that evaluates our risk attitudes and governance.



El Lynn Yeoh

Head of Ethics and ESG,
Prudential Assurance Company,
Singapore

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BAIN CAPITAL: WORKSHOPS TO UPSKILL COMPLIANCE IN ASIA



Melissa Obegi

**Asia General Counsel,
Bain Capital**

Bain Capital's attitude towards its investment portfolio is distinctive for its hands-on approach, taking the principles of management consulting and actively partnering with companies who seek and would benefit from strategic input. For Obegi, that translates into a relationship with Bain's portfolio companies that centers on aligning objectives, as opposed to "a more forensic or audit-driven, more oppositional approach" to risk and compliance. The workshops with Ethisphere allow Bain to provide ongoing, tailored support to company compliance teams.

One of the advantages of this consulting mindset is that Bain is able to consider investments that others looking for more passive engagements might consider too risky. "I do think we are able to work with companies that are less mature but are willing to undertake a journey of progress," says Obegi. The main requirement becomes a basic commitment to shared values.

So what exactly are these workshops trying to accomplish, and how have they developed and evolved over the years?

The association between Bain and the Ethisphere team began in 2012, as Obegi was seeking a way to help assess and upskill Bain's portfolio companies, most of which the firm has a controlling stake in. Since Bain's investments in the Asia Pacific region typically operate on medium-term, three- to seven-year timelines, the firm had every incentive to improve its portfolio companies' risk controls and programs.

[Read More](#)

SEEKING BUSINESS SUCCESS? FOCUS ON FOSTERING AN ETHICAL CULTURE

One of the keys to avoiding ethical missteps is to understand your culture –its strengths and its weaknesses. This requires measurable data about culture, which can only be fully obtained through a standalone, dedicated ethical culture survey.

One of the questions I often hear from companies I work with is, “Why can’t I just put a few ethics questions on my employee engagement survey?” Here’s what I tell them.

- You won’t get enough data about ethical culture. A few questions tacked on to an engagement survey—realistically, I’ve never seen more than five or six questions—aren’t going to give you close to enough information to understand what’s happening across the business. To fully understand how your employees feel about your organization, you need questions about a variety of culture-related topics.
- The data could be unreliable. Based on where questions about ethical culture are placed in an engagement survey, results can be colored by how employees feel about other topics. If culture questions are near questions about compensation, for example, employees’ responses to the culture questions might be influenced by they feel about that unrelated topic.
- A dedicated survey shows that ethics matter to the company. By taking the time and resources to implement a dedicated ethical culture survey, organizations send the message that ethics and compliance matter and warrant attention from employees.



Erica Salmon Byrne, J.D.

**Executive Vice President and
Chair of the Business Ethics
Leadership Alliance (BELA)**

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GLOBAL ETHICS SUMMIT REPLAY: MEASURING CULTURE



GLOBAL ETHICS SUMMIT

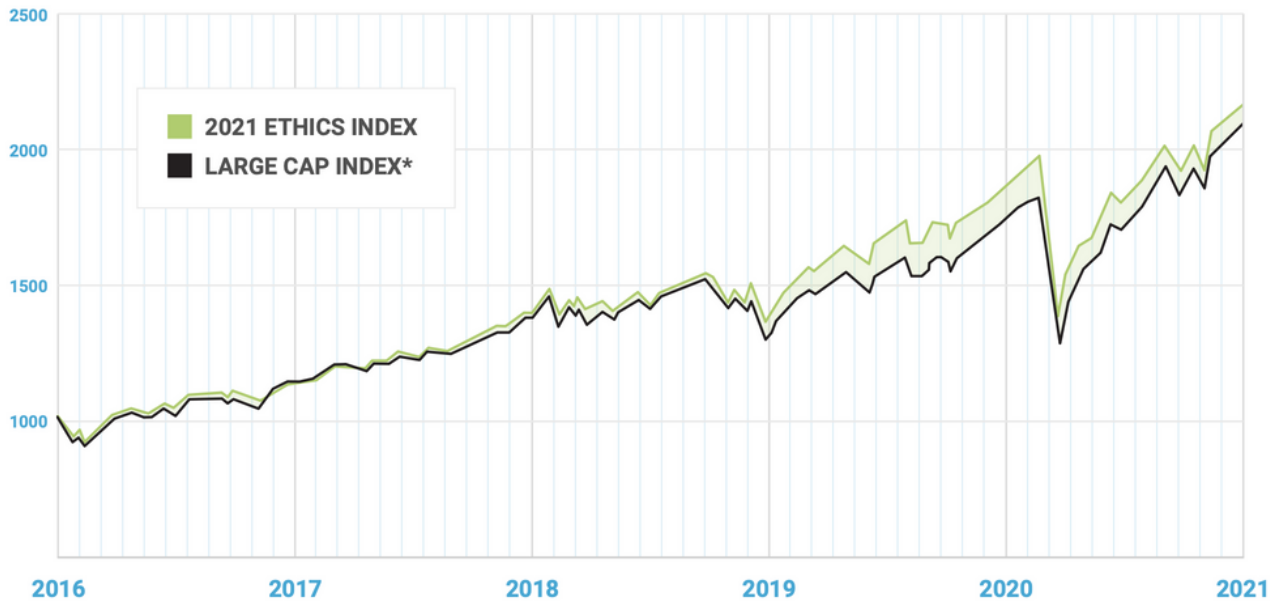
Culture is often defined as "the way we do things around here," but to us, ethical culture is about whether employees know the way to do things—and whether they will ask questions when they need help. For the last several years we've been measuring ethical culture, and in this session, Erica Salmon Byrne, EVP, Ethisphere, discusses what we see in our global data set and how you can use this data to effectuate real change. This video is a short clip from the full session at Ethisphere's 2021 Global Ethics Summit event.

Watch the session *Measuring Ethical Culture at the 2021 Global Ethics Summit: Part One*.

[Watch Now](#)

[Download the Culture Recap](#)

STRONG ETHICS IS GOOD BUSINESS



ETHISPHERE
GOOD. SMART. BUSINESS. PROFIT.

FIVE-YEAR ETHICS PREMIUM: 7.1%

*Solactive US Large Cap Index (GTR)

According to data from Ethisphere's 2021 Ethics Index, the collection of publicly traded companies recognized as recipients of this year's World's Most Ethical Companies designation outperformed a comparable index of large-cap companies by 7.1 percentage points over the past five calendar years.

The outperformance, which we refer to as the "Ethics Premium," has remained consistent since we began tracking the equity performance of honoree companies.

We believe this outperformance is the result of the kinds of practices that lead a company to be on our list—practices that demonstrate investment in their people, their culture, and their communities. We see in this data that those practices, over time, lead to stronger financial performance.

As evidenced by this continued outperformance, ethics is good for business.

[Download the Ethics Premium](#)

SECTION 2

REPORTING MISCONDUCT

GLENMARK PHARMACEUTICALS

I strongly believe that people make the company's culture. The kind of people you recruit will shape that culture of your company. And apart from the good people or the experienced people, I would say that our culture is supported by our strong ethics and compliance program.



Tejash Shah

Vice President, Compliance,
Glenmark Pharmaceuticals

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BAKER MCKENZIE

A strong **ethical culture and compliance program** are at the heart of good corporate governance. Unfortunately, governance failures often stem from poor “tone at the top” or lack of attention and resources from management. Beyond exercising oversight and asking the right questions, **the Board of Directors** also has a role when serious alleged misconduct is raised to direct and oversee a well-resourced and **independent investigation** and to ensure that the appropriate remediation action is implemented.



Mini vandePol

Head of Baker McKenzie's
Asia Pacific Compliance &
Investigations Group

[Read More](#)

SECTION 3

BULLYING AND HARASSMENT TRENDS

JOHNSON CONTROLS

It is not a surprise that **bullying and harassment** claims have increased since the start of the pandemic. While a large portion of those claims seem to be also **unsubstantiated**, it indicates a shift in the mental wellbeing of the workforce, and it should not be ignored. Across Asia Pacific, we have launched a respectful workplace **training campaign**, which is proactive because Johnson Controls has not experienced or seen an increase in **HR diversity**, and workplace respect concerns.



Sonali Narasimhan

Regional Head of Compliance,
Asia Pacific, Johnson Controls

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SECTION 4

INVESTIGATIONS AND DOCUMENT RETENTION

NOKIA

At Nokia, we have made a **short video** that explains step-by-step what happens when an **employee raises a concern**. In short, it clearly articulates our triage process. Remember, there's a **human side** to this where we need to understand the **employee's perspective**. With that in mind, the video clearly outlines the specific timeframe of when they will be contacted and how the process will be concluded.



Mona Dange

Global Head, Regional & Business
Group Compliance, Nokia

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MORRISON & FOERSTER ON DOCUMENT RETENTION

“Document retention” is much more than just **preserving work papers** in a file. There are many different types of data generated in the course of an investigation– including the **documentary evidence** collected from investigation subjects (which may be e-mails, calendar items, word processing files, spreadsheets, slide decks, document images, and increasingly, text and other instant messages), the correspondence generated by **investigators**, and the reports documenting the investigative efforts and its conclusion.



Dan Levison

Partner, Morrison & Foerster
(Singapore)

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LEADER COMMENTARY ON RECOMMENDING DISCIPLINARY ACTIONS



“

Standard disciplinary actions following disciplinary guidelines should be taken

”

“

Our processes still need improvement, and there's more work ahead for us and the company

”

“

The Disciplinary Boards look at prior violations and similar cases and recommend consistent disciplinary action, irrespective as to the seniority of the employee

”

“

A Disciplinary Committee looks at consequence management for all substantiated claims

”

“

Investigation outcomes are discussed by a committee at the Asia level; their recommendations are communicated to the local management

”

SECTION 5

DRIVING A CULTURE OF CYBERSECURITY

EY ON A CULTURE OF CYBERSECURITY

Organizations are constantly being **inundated by attacks** on their IT systems and data. In fact, those that don't have a strong **culture of cyber resiliency** could easily fall prey to these unsuspecting attacks. With increasing digitalization and reliance on technology, there is now a greater risk and likelihood that compromise could exist in corporate networks and are going undetected. For this reason, and much more, organizations must adopt a mindset of **a constant state of compromise**—which means data could land into the wrong hands at any time.”



Ramesh Moosa

Asean and Singapore Forensic & Integrity Services Leader, EY

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DEUTSCHE TELEKOM: COMPLIANCE'S ROLE IN AI ETHICS AND DIGITAL INNOVATION



Manuela Mackert

**Chief Compliance Officer,
Deutsche Telekom**

Germany-based Deutsche Telekom (DT) consistently ranks among the top ten largest global telecommunications companies and is Europe's leader in the space. The company and its many subsidiaries provide the base upon which the digital economy runs for many consumers. As critical infrastructure, the company knows that it has an extra obligation to be responsible with its networks. Enter Manuela Mackert, who has been Chief Compliance Officer for the entire group since 2010 and for the past several years has been thinking seriously about digital responsibility and AI ethics, making DT a leader in that space.

Megatrends Shaping Compliance

Given her background—Mackert worked in human resources for many years before jumping to compliance—she is keenly interested in the changing nature of work in the digital age and how that shift impacts the needs of the compliance function. With that in mind, she has her eyes on two sets of “megatrends” shaping our economy: the shift to digital work and the pressures pushing towards “agile organizations.”

These twin megatrends drove Deutsche Telekom's compliance organization to focus on a few priorities, including fostering values-based compliance. Agile organizations require empowered employees, versed in their company's values and priorities, to make rapid decisions. Among other things, the need for agility has pushed compliance from a rules-based order to one more concerned with teaching values to help employees structure their decisions. Perhaps the most important innovation that the compliance team rolled out was “an AI-based check box” designed to dynamically walk employees through the ethical and legal requirements of various tasks.

[Download Now](#)

OMEGA COMPLIANCE ON MAXIMIZING SUPPLIER INTEGRITY

The most effective way to maximize **supplier integrity** is to take a hands-on approach. Suppliers can have all the **documentation** in the world, but the truth is, seeing is believing. In order to truly know if a factory in Bangladesh or a facility in China is meeting your **ethical and compliance standards**, you need to go and see it. For companies using hundreds, or even thousands, of suppliers—in the middle of a pandemic—this is labor intensive. But the risks outweigh the **time and expense**.

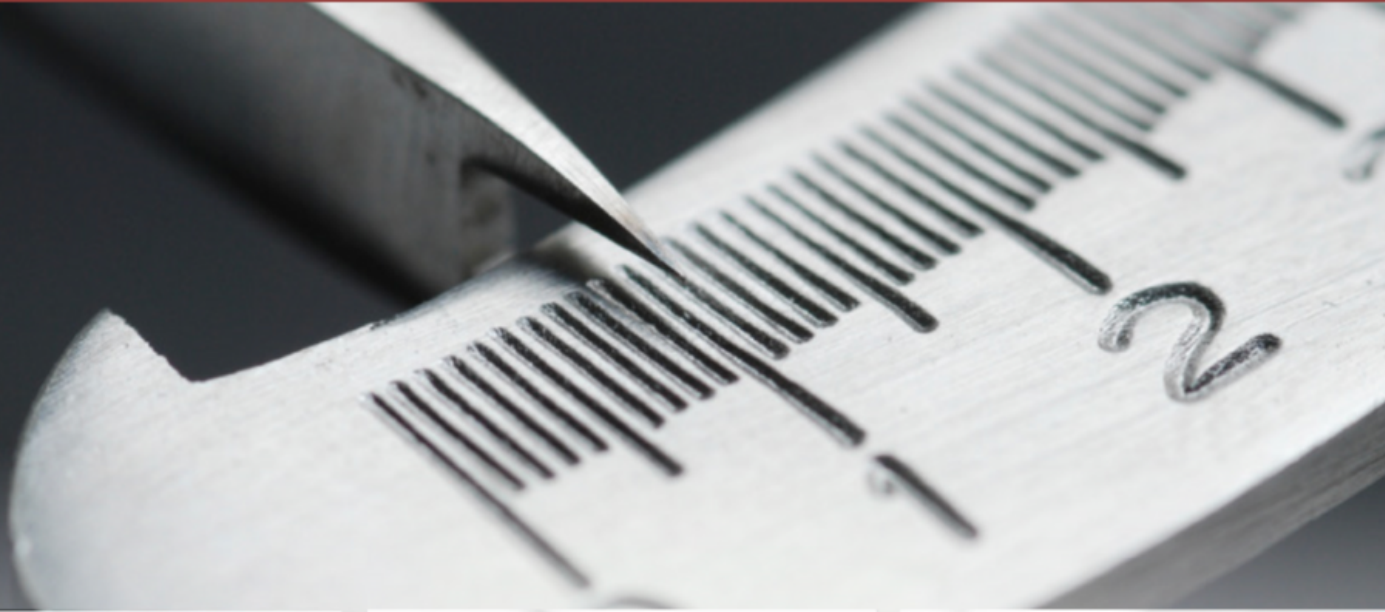


Jon White

Managing Director,
Omega Compliance

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Every day many of the world's most trusted brands put their faith in Omega as they endeavor to work with suppliers who operate ethically, securely and free from corrupt practices.



SUPPLY CHAIN MONITORING



Every day many of the world's most trusted consumer brands put their faith in Omega to ensure the integrity of their global supply chains.

[LEARN MORE >](#)

ETHICAL BEHAVIOR



A dedicated, internal ethical team requires our staff to uphold exceptional levels of integrity, honesty and transparency at all times.

[LEARN MORE >](#)

EXPERTISE



Omega provides insight and guidance over a broad range of industry challenges and trends. View our thought leadership section to learn more.

[LEARN MORE >](#)

Omega goes beyond supply chain monitoring. With a network of teams stationed across the globe, we provide deep expertise navigating local challenges, such as forced labor, human trafficking and wages/working hours non-compliance, as well as broader industry issues such as supply chain corruption and unauthorized subcontracting. With an industry leading anti-corruption program, and client services in Hong Kong and the United States, Omega places its partners at the center of its business. We pride ourselves on delivering excellence with flexibility, attention to detail and unparalleled integrity.

Learn more about Omega Compliance here: <https://www.omegacompliance.com>
Contact: Jon White, Managing Director: jwhite@omegacompliance.com



ETHISPHERE'S EIGHT PILLARS OF ETHICAL CULTURE

1

Awareness of the E&C Program and Resources

2

Perceptions of the Function

3

Observing & Reporting Misconduct

4

Pressure

5

Organizational Justice

6

Supervisor Perceptions

7

Perceptions of Leadership

8

Perceptions of Peers & Environment

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SETTING THE STAGE: ETHISPHERE'S ETHICAL CULTURE BENCHMARK DATA

1 million +

RESPONSES RECEIVED

90

COMPANIES AROUND THE WORLD

>5 million

REPRESENTED HEADCOUNT

*Figures as of 11/15/20

BELA ASIA PACIFIC COMMUNITY RESOURCES

BEST PRACTICES FROM THE FRONT LINES: BELA AsiaPac Chapter Newsletter



Member-driven monthly APAC newsletters are designed to keep the community engaged and informed

150+
APAC leaders

325+
BELA members have access to APAC resources

SHARING INSIGHT ACROSS THE COMMUNITY: Company Best Practices within AsiaPac Hub



30+

New Contributions

Quarterly detailed roundtable recaps with data and presentations

20+

APAC Magazine contributions

Member-driven topics include:
Promoting a speak up culture
Cybersecurity and data privacy
Policy framework

AsiaPac Community Discussions and Connections

VIRTUAL ROUNDTABLE – JUNE 4TH, 2020



Sharing Insight Across the Community: Company Best Practices within AsiaPac Hub



The past year was a challenge globally, and yet we experienced the global ethics and compliance community coming together to ensure continuity in their work. We saw a unique level of commitment from our Asia Pacific leaders who were tasked with re-imagining their ethics and integrity programs. While we weren't able to get together in person, we were pleased to be able to host four virtual roundtables over the last year and launch the first Asia Pacific Magazine. Despite being virtual, we were still able to collaborate to create data from snap polls and share program resources with one another through the virtual BELA Asia Pacific Member Hub. Here's a recap of our activities over year two of the BELA Asia Pacific Chapter.

[Read More](#)

Elevate Your Culture and Overcome People- Created Risks

Data, expertise, and toolkits to help ethics and compliance teams focus on sustainable culture change

Measure Your
Culture

Turn Insights into
Action

Become an Agent
of Change

[LEARN HOW WE CAN HELP](#)



IN PARTNERSHIP WITH



BELA ASIA PACIFIC CONTACTS

Aarti Maharaj
Managing Director,
BELA Asia Pacific
Aarti.Maharaj@Ethisphere.com

Kevin McCormack
Executive Director,
BELA
Kevin.McCormack@Ethisphere.com