

A man with a beard and glasses, wearing a green shirt, is seated at a conference table and gesturing with his hands while speaking. He is looking towards the right. In the foreground, the back of a person with long dark hair wearing a white shirt is visible, also seated at the table. The table has papers, a glass of water, and a small potted plant. Large windows are in the background, letting in bright light.

# 50+ Essential Ethics & Compliance Stats for 2025 Planning

This e-book will save your team hours of work

**ETHISPHERE**<sup>®</sup>  
GOOD. SMART. BUSINESS. PROFIT.™

# Executive Summary



## EXECUTIVE SUMMARY

Ethics and compliance teams are busier than ever, juggling a growing array of responsibilities that leave little time for deep research and data gathering.

Yet, having access to the right stats, trends, and benchmarks is crucial for building effective strategies and making a compelling case for compliance investment.

We've compiled the most impactful, insightful, and up-to-date stats from across the industry into one convenient resource. Pulling from 12 sources, we've compiled over 50 distinct data points to help you confidently craft your 2025 plans.

These insights will strengthen your end-of-year presentations, ensuring you can secure the buy-in you need for key initiatives and to support the case for ethics and compliance investment.

THIS E-BOOK WILL  
SAVE YOUR TEAM  
HOURS OF WORK.



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## 8 ESSENTIAL CATEGORIES

The Cost of Non-Compliance

Program Investment

Compliance Challenges

Board Engagement

Shifts in Organizational  
Composition

Artificial Intelligence

Whistleblowers and Speak-Up  
Culture

Third Parties

# The Cost of Non- Compliance

“If you think compliance is  
expensive, try non-compliance.”

—Former U.S. Deputy Attorney General Paul  
McNulty

# Non-Compliance is Costly

Integrity incidents and penalties are critical metrics, highlighting the growing risks and financial consequences of non-compliance. The volume of organizations with integrity incidents showcases the vulnerability in organizational culture and controls, necessitating proactive measures to uncover and mitigate risks.

Increasing penalties and the money charged, underscore the increasing regulatory scrutiny and the financial impact of non-compliance, emphasizing the importance of well-resourced compliance programs.

These trends serve as a call to action for leaders to strengthen their compliance frameworks to protect their organizations from both reputational damage and financial loss.

Sources:

<https://fcpa.stanford.edu/statistics-analytics.html>

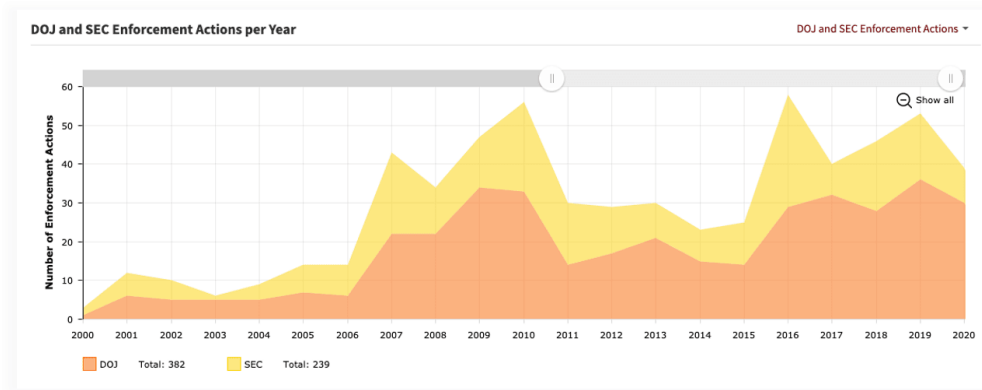
<https://violationtracker.goodjobsfirst.org>

**INTEGRITY INCIDENTS ARE GROWING**  
**21%** of organizations have experienced a significant integrity incident

**PENALTIES ARE GROWING**  
**40%** growth in number of violations and the number of companies with violations

**THE TRILLION-DOLLAR MARK**  
U.S. companies have paid  
**>US\$1 Trillion**  
in fines, penalties, and settlements since 2000

## NON-COMPLIANCE IS COSTLY



**\$119.7 Million**

Average monetary settlement amount since 2015

**\$1.8 Million**

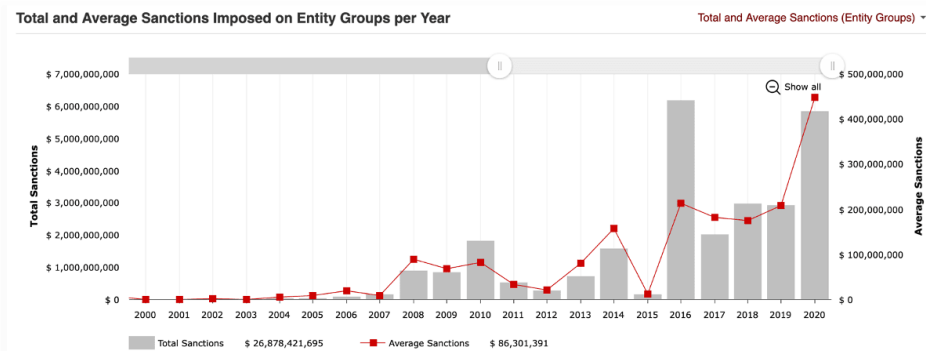
Average monthly cost for FCPA-related investigation

**38 Months**

Average length of an FCPA investigation

**\$13.1 Billion**

Monetary sanctions paid to foreign governments in FCPA-related enforcement actions



Source: <https://fcpa.stanford.edu/statistics-analytics.html>

# Compliance Challenges

“Ensure compliance and be responsive to the feedback.”

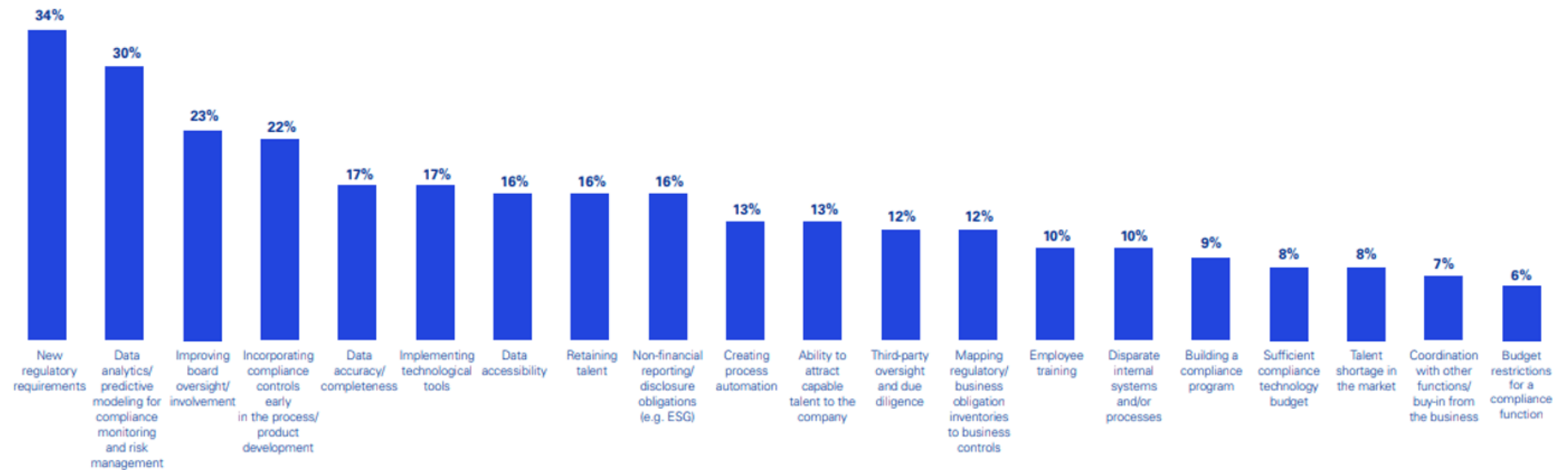
—Anne McLellan, 9th Deputy Prime Minister of Canada

## A CHANGE IN LANDSCAPE

# Top Challenges for Compliance Programs

What are the top challenges your organization will face with regard to its compliance efforts in the next two years?

(Chart shows percentage of respondents who selected each challenge in their top three choices.)



Source: [KPMG Chief Ethics and Compliance Officer Survey](#)

## STAKEHOLDERS

# Pressure to Enhance Compliance

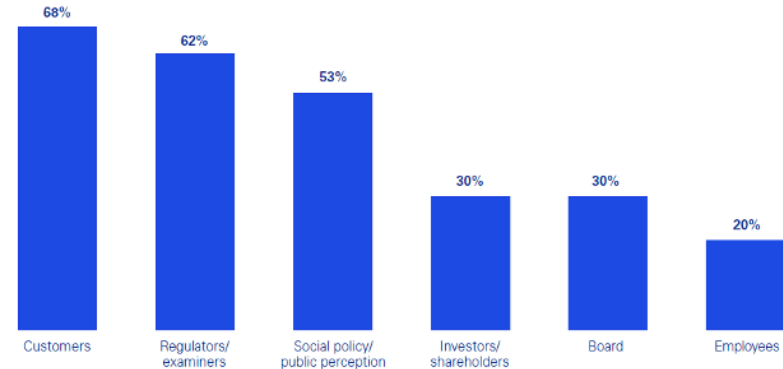
The significance of a compliance team's top challenges is amplified by external pressures from customers, regulators, and social perceptions, which are increasingly demanding higher standards of ethics and compliance.

New regulatory requirements and evolving expectations necessitate that compliance teams remain agile, while data analytics and predictive modeling are essential for proactively managing risks. Improving board oversight and incorporating compliance controls early in product development are critical for embedding a culture of compliance that meets both internal and external expectations.

Additionally, as the focus on compliance intensifies, ensuring data accuracy and completeness becomes even more crucial, as reliable data supports effective decision-making and builds trust with stakeholders.

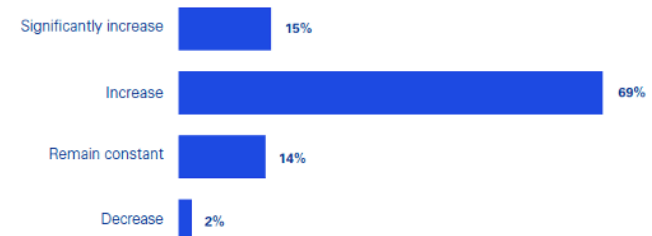
### From which areas are you feeling the most pressure to enhance compliance in the coming years?

(Chart shows percentage of respondents that selected all that apply.)



### Do you expect the level of compliance focus to increase, decrease or remain constant in the next two years as compared to prior years based on regulatory expectations and scrutiny?

(Chart shows percentage of respondents who selected one option as their top choice.)



Source: [KPMG Chief Ethics and Compliance Officer Survey](#)

# Global Business Trends

## WORLDWIDE ISSUES

**Major election year**, 64 countries representing half the global population

*Notable: U.S., Taiwan, U.K., European Union, Mexico, Iran, France, India*

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**Geopolitical tensions:** Russia/Ukraine, Israel/Palestine conflicts

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**Climate change:** Increase in natural disasters, trade routes

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**Artificial Intelligence:** Increased use, lack of legislation/regulation

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**Financial concerns:** Inflation, global interest rates, elevated debt levels, trade restrictions

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**Raw materials shortages**

---

## DESPITE PUSHBACK, ESG CONTINUES TO GROW

**Blackrock CEO Larry Fink** “conscientious capitalism” and instead of talking about “vague terms around ESG,” he focuses on “decarbonization, governance ... or social issues”

---

**Supported by regulations internationally** (CSRD, CSDDD, SEC Climate Disclosure)

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## SHIFTS IN ORGANIZATIONAL COMPOSITION

**Human capital:** organization's value is increasingly related to intangible assets

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**Gen Z** comprises more of the U.S. workforce than Baby Boomers

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# Shifts in Organizational Composition

“Human capital is the most important investment we can make.”

—Economist Hans-Helmut Kotz

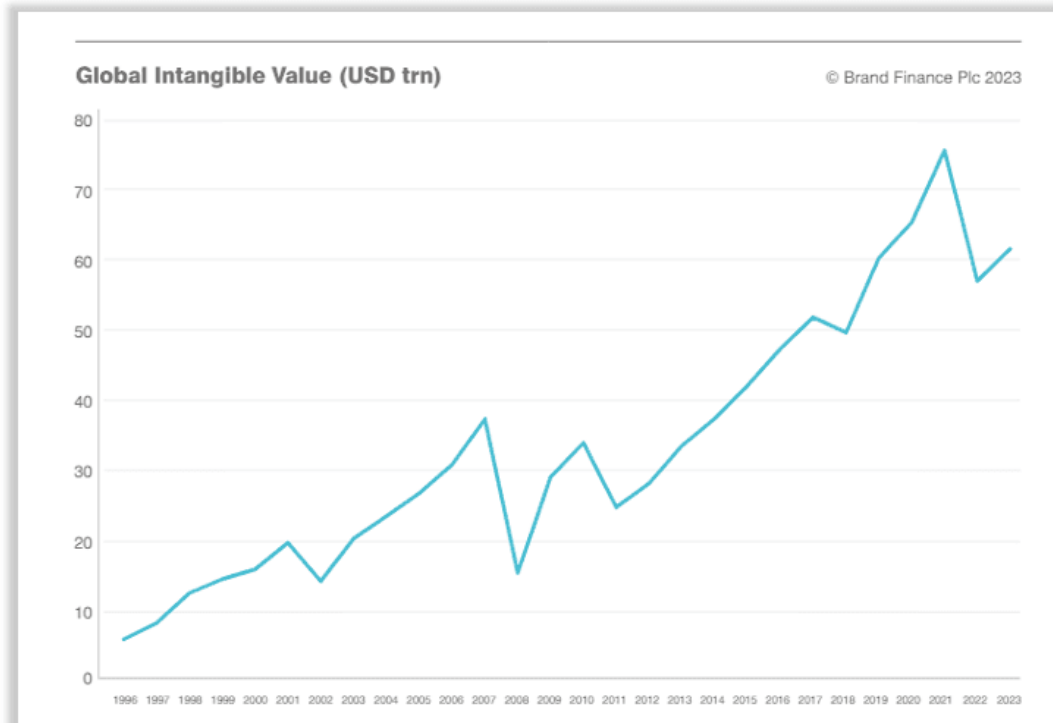
# Intangible assets are comprising more of company value.

This reflects the growing importance of intellectual property, brand reputation, and human capital in driving business success.

This shift underscores the need for robust ethics and compliance programs to protect and manage these valuable but vulnerable assets.

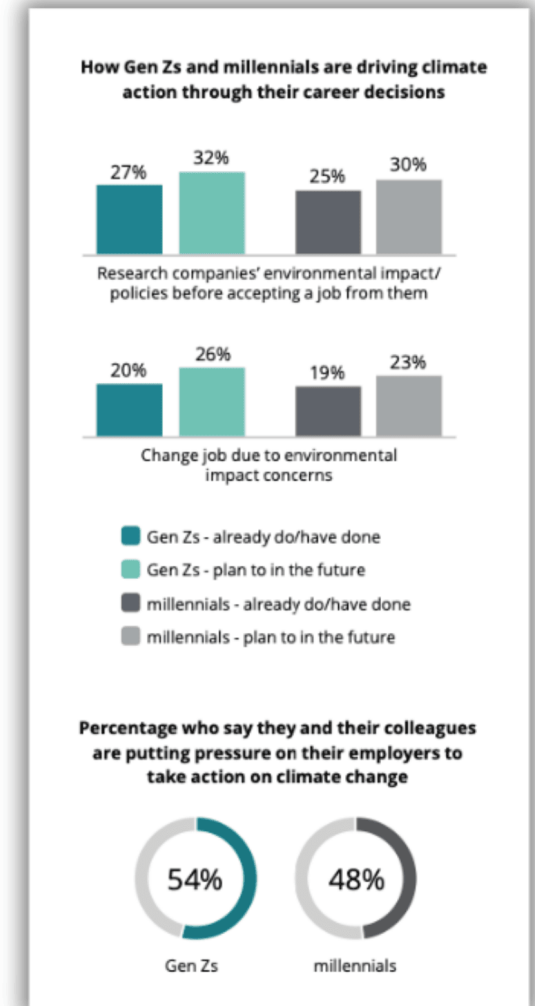
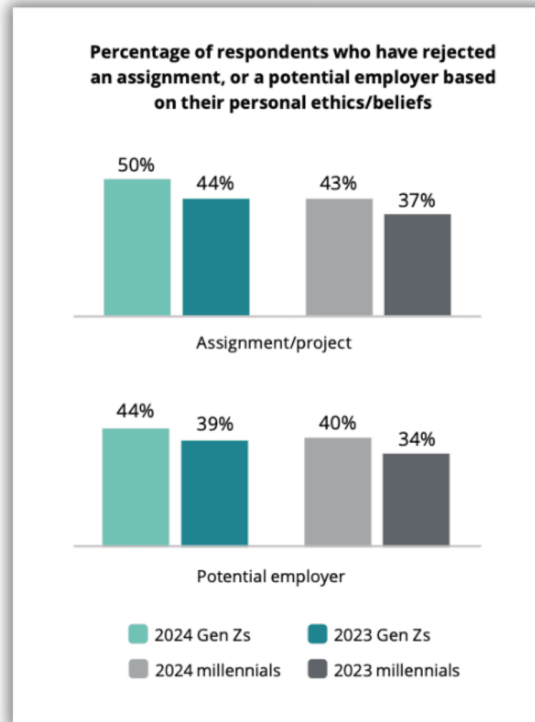
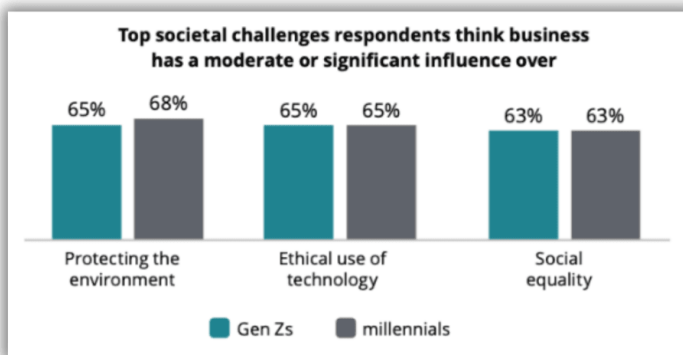
**Intangible assets are more susceptible to risks, making their management a critical aspect of governance.**

For compliance teams, this highlights the need for forward-thinking strategies that prioritize innovation, ethical practices, and long-term value creation.



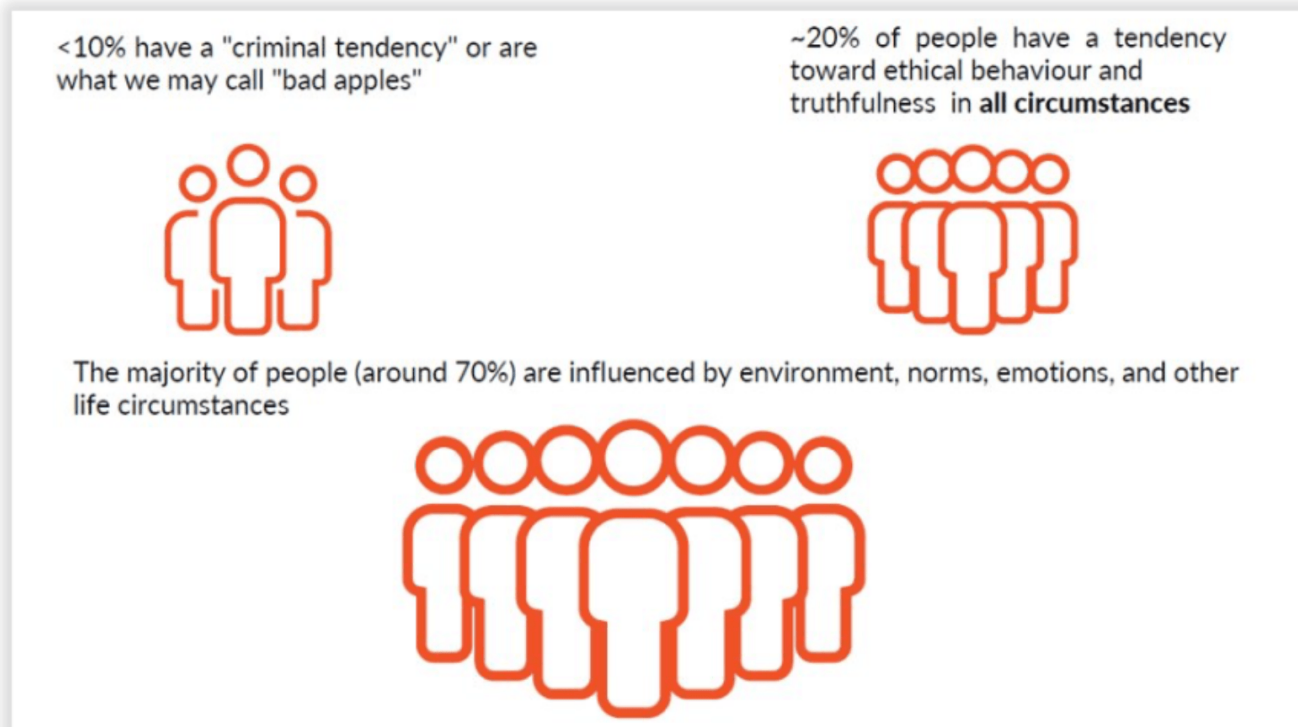
[Global Intangible Finance Tracker \(GIFT™\) – an annual review of the World's Intangible Value November 2023](#)

# Gen Z and Millennial Expectations



Source: [Deloitte: 2024 Gen Z and Millennial Survey](#)

# Ethical Propensities - The Human Factor



Source: [A Human-Centric Approach to Compliance Program Maturity](#)

Most people see themselves as ethical and believe they will act in line with their values and company policies when faced with an ethical dilemma.

**Ethical violations aren't always the result of a single "bad actor"**

Even well-intentioned individuals make choices that go against policies or training. While a small minority may be inherently dishonest, and a few consistently ethical, most people are influenced by their environment, social norms, and personal circumstances.

This means ethical behavior can vary depending on the situation. Understanding these factors is crucial in promoting ethical decision-making within organizations.

# Whistleblowers and Speak-Up Culture

# Increased Focus on Whistleblower incentives

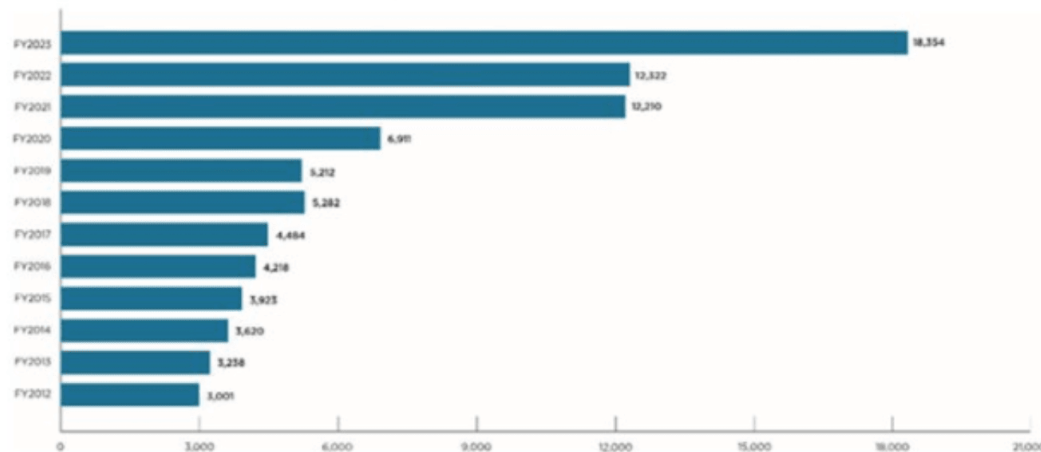
## A 49% INCREASE IN WHISTLEBLOWER TIPS FROM 2022-2023

This signals a growing willingness among employees and stakeholders to report potential misconduct. This rise suggests that the DOJ's incentives for whistleblowers to report are working. For compliance teams, this means that underscores the importance of having robust whistleblower protection programs in place.

Compliance teams need to ensure that a speak-up culture is championed internally and the reports are welcomed, operationalized, and communicated to employees and stakeholders, so that the compliance team can investigate and address reports and make an informed decision about the need to self-disclose, rather than being on defense when the regulators bring the tips to the organization.

### Increase in Whistleblower Tips

In FY 2023, the Commission received 18,354 whistleblower tips. The table below shows the number of whistleblower tips received by the Commission on a yearly basis since the inception of the Whistleblower Program.<sup>11</sup>



Source: [Securities and Exchange Commission Office of the Whistleblower](#)

## CULTURE & EMPLOYEE ENGAGEMENT

# Reality of Speaking Up

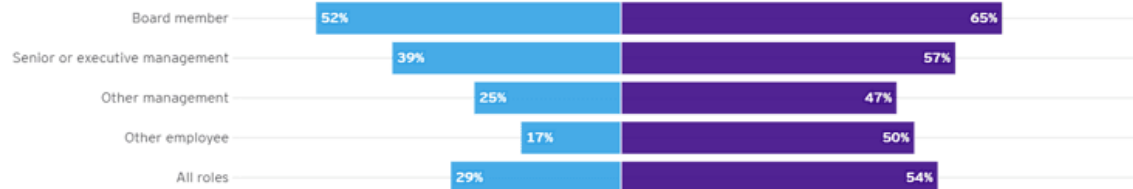


ETHICAL CULTURE  
**ACCELERATOR**  
ASSESS.EXPLORE.TRANSFORM.

Board members and senior executives are more likely to report misconduct, but face more pressure not to report

Global North America South America Europe Africa and the Middle East Asia

Reported misconduct in the last two years Felt pressured not to report



Source: [KPMG Stepping up to a New Level of Compliance](#)

### MISCONDUCT IS UNDERREPORTED

93% of employees say they would report misconduct if witnessed; only 50% of employees actually report it.

50%



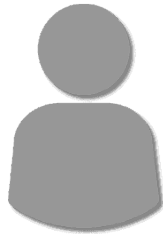
93%

Source: [Ethisphere 2024 Ethical Culture Report](#)

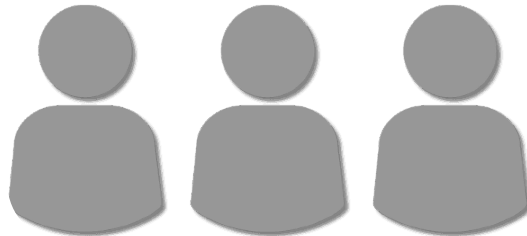
ETHICAL CULTURE

# Reporting Misconduct: Employees Choose People

Hotline  
**11%**



HR  
**36%**



Manager  
**60%**



Source: [Ethisphere 2024 Ethical Culture Report](#)

## REPORTING

# Hotline Roles in Investigations

How does your organization manage reports of perceived misconduct and subsequent investigations?

68%

Single tracking tool/ case management system used

32%

Different functions use separate tools/systems



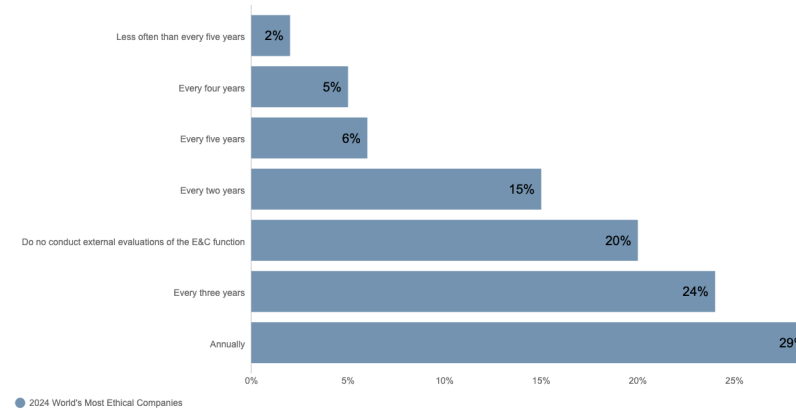
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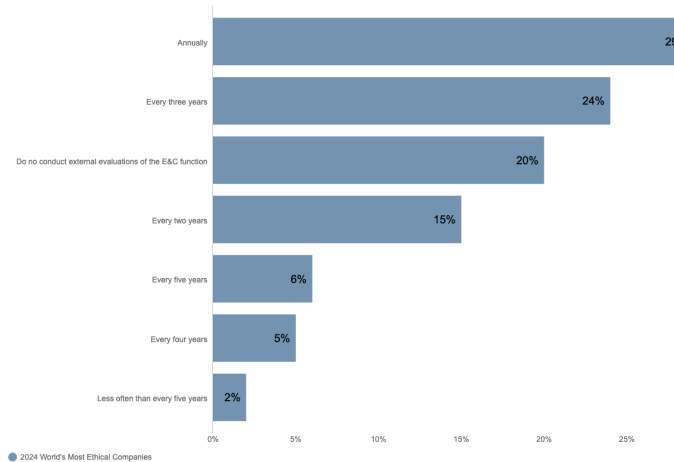
Source: [The Sphere, Ethisphere's Benchmarking and Ethics and Compliance Statistics tool: Get access today](#)

**96%**  
of the World's  
Most Ethical  
Companies®  
honorees  
measure their  
company's  
ethical culture at  
least every two  
years.

Which of the following types of surveys are used to measure ethical culture within your organization? - Select all that apply - 7/03



How frequently does your organization administer a survey or surveys that measure employee perceptions of ethical culture or the compliance program? - 7.04



2024 WORLD'S MOST  
**ETHICAL**  
COMPANIES®  
ETHISPHERE

**74%**  
conduct a stand-alone  
ethical culture survey

**96%**  
*do so at least  
every 2 years*

Source: [The Sphere, Ethisphere's Benchmarking and Ethics and Compliance Statistics tool: Get access](#)

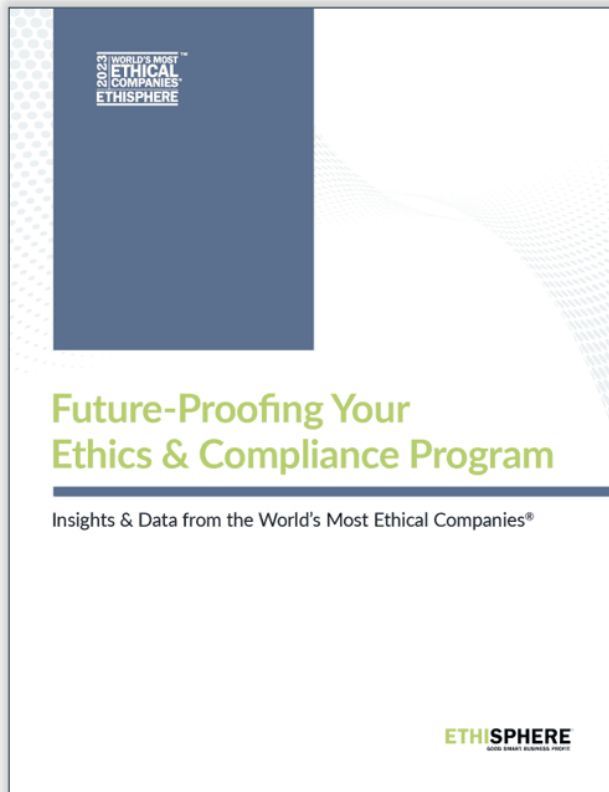
# Program Investments

“A budget is more than just a series of numbers on a page; it is an embodiment of our values.”

—Barack Obama

## 2025 PROGRAM PREPARATION

# Doing Business With Integrity Reduces Risks



Examples of business failures when controls are not in place...



No Chief Risk Officer for 8 months before the biggest bank failure since the 2008 financial crisis



Toxic workplace culture leading to boycotts, eventual sale of club



Backlash over third-party factory working conditions; \$1.9 billion loss in value



Complete lack of management, governance, accounting, and information security controls

## ETHICS & COMPLIANCE

# The Value of Robust Programs and Practices

*“Companies should feel empowered to do the right thing—to invest in compliance and culture, and to step up and own up when misconduct occurs. Companies that do so will welcome the announcements today. For those who don’t, however, our Department prosecutors will be empowered, too—to hold accountable those who don’t follow the law.”*



**Lisa O. Monaco**

Deputy Attorney General, Department of Justice [Remarks](#) made about the [September 15, 2022 memo](#) outlining revisions to Corporate Criminal Enforcement Policies

RESOURCE PLANNING

# Annual Compliance Budgets



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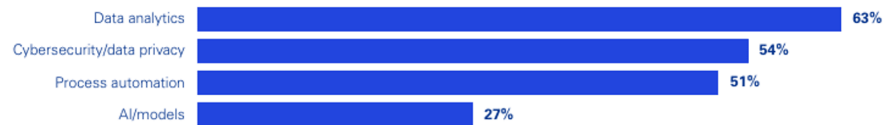
| Annual Compliance Budget | NUMBER OF EMPLOYEES |                     |                     |                   |                   |                   |                    |                 |
|--------------------------|---------------------|---------------------|---------------------|-------------------|-------------------|-------------------|--------------------|-----------------|
|                          | <1000 Employees     | 1000-4999 Employees | 5000-9999 Employees | 10k-15k employees | 15k-25k Employees | 25K-50K Employees | 50K-100K Employees | >100K Employees |
| <\$50K                   | 0                   | 8%                  | 0%                  | 0%                | 0%                | 0%                | 0%                 | 0%              |
| \$50K-\$150K             | 20%                 | 14%                 | 3%                  | 0%                | 0%                | 0%                | 0%                 | 0%              |
| \$150K-\$250K            | 10%                 | 5%                  | 0%                  | 0%                | 0%                | 3%                | 0%                 | 0%              |
| \$250K-\$500K            | 10%                 | 14%                 | 10%                 | 0%                | 9%                | 0%                | 6%                 | 3%              |
| \$500K-\$1M              | 20%                 | 14%                 | 13%                 | 5%                | 3%                | 15%               | 3%                 | 0%              |
| \$1M-\$5M                | 40%                 | 30%                 | 50%                 | 50%               | 47%               | 58%               | 34%                | 24%             |
| \$5M-\$10M               | 0%                  | 14%                 | 10%                 | 36%               | 22%               | 13%               | 16%                | 29%             |
| >\$10M                   | 0%                  | 3%                  | 13%                 | 9%                | 19%               | 13%               | 41%                | 44%             |

Source: [The Sphere EQ 2024 Data Year](#)

# Staffing and Budgets

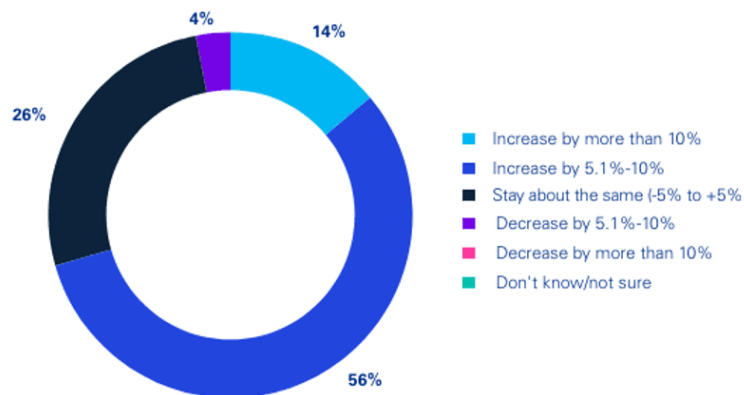
## If you anticipate a budget increase, which area(s) are driving the additional need for investment?

(Chart shows percentage of respondents that selected all that apply.)



## How will your technology budget for your ethics and compliance function change in the next year as compared to the following year?

(Chart shows percentage of respondents who selected each area in their top three choices.)



*"Data Resources and Access – Do compliance and control personnel have sufficient direct or indirect access to relevant sources of data to allow for timely and effective monitoring and/or testing of policies, controls, and transactions? Do any impediments exist that limit access to relevant sources of data and, if so, what is the company doing to address the impediments?"*

- U.S. DEPARTMENT OF JUSTICE CRIMINAL DIVISION  
EVALUATION OF CORPORATE COMPLIANCE PROGRAMS

Source: [U.S. Department of Justice, Criminal Division](#)

# Board Engagements

“The key to successful leadership today is influence, not authority.”

—Ken Blanchard

WORLD'S MOST ETHICAL COMPANIES DATA

# Talking with the Board



E&C talks to new board member at onboarding



Independent directors meet with major shareholders



Meet with priority clients/ third parties



Interactive sessions with board on E&C matters



Board has regular updates with metrics about workforce



Discussion on compensation structure and incentives

Source: [The Sphere](#)

# Sharing Investigation Statistics Beyond the Board – Necessary to Increase Faith in the Process

96%

Share data with  
Board or Board  
Committee

45%

Of industry peers  
share in ESG or  
annual reports

What can this look like?

Consider sharing:

- Average number of issues raised in a year or quarter
- Types of issues raised
- Modalities used to raise concerns
- Days to close investigations
- Substantiation rates
- Discipline by percentages (X coached, Y trained, etc..)
- Anonymized fact patterns (commonly used in communications or training)

Source: [The Sphere, Ethisphere's Benchmarking and Ethics and Compliance Statistics tool: Get access today](#)

# Artificial Intelligence

“By far, the greatest danger of AI is that people conclude too early that they understand it.”

—Eliezer Yudkowsky

## ARTIFICIAL INTELLIGENCE

# AI: Policies Lagging Behind Use

This highlights a significant gap in governance that could lead to substantial risks. There's widespread adoption of AI that, if unregulated, could result in unintended legal, ethical, or operational consequences.

The fact that only **18% of employees** are aware of an official AI policy suggests that many are operating without clear guidance, increasing the likelihood of non-compliance with internal or external regulations.

This underscores the urgent need for compliance leaders to develop, communicate, and enforce robust AI usage policies to protect the organization from potential liabilities and ensure ethical AI practices.

**35%**

of employees are intentionally using AI monthly or more often to assist with their work

**YET ONLY...**

**18%**

reported knowing that their employer has an official policy about acceptable uses of AI



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Source: [American Psychological Association 2024 Work in America Survey](#)

# Third Parties

# Third Parties Present Risks

Approximately 90% of Foreign Corrupt Practices Act (FCPA) enforcement matters between 1978 and 2023 identified a third-party intermediary, such as a sales agent, consultant or distributor, as part of the bribery scheme

Source: [Stanford Law School FCPA Clearinghouse](#)

49%

of organizations have experienced a data breach caused by a third-party vendor in the last 12 months.

61%

of organizations aren't confident that their third parties would notify them if they had a data breach involving your organization's sensitive and confidential information.

Source: [Ponemon Report](#)

# Third Parties Due Dilligence



SCOPE OF DUE  
DILIGENCE  
BEFORE  
BRINGING ON  
THIRD PARTIES

55%

Conduct due diligence  
before entering all  
third-party relationships

HOW IS THE THIRD-PARTY DUE  
DILIGENCE PROCESS MANAGED?

93%

Conduct due diligence before  
entering all third-party  
relationships

43%

At the regional or  
business function level

Source: [The Sphere, Ethisphere's Benchmarking and Ethics and Compliance Statistics tool: Get access today](#)

# Talking with Third Parties

"How has the company communicated its policies and procedures to all employees and relevant third parties?"



THE UNITED STATES  
DEPARTMENT OF JUSTICE

2024 | WORLD'S MOST  
**ETHICAL**  
COMPANIES<sup>®</sup>  
**ETHISPHERE**<sup>™</sup>

## FREQUENCY

**52%** Communicate regularly about E&C requirements (more than low risk)

**76%** Communicate at least annually with 3rd parties on Impacts

## METHOD

**88%** Internet portal

**89%** Email

**77%** Surveys / Questionnaires

Source: [The Sphere, Ethisphere's Benchmarking and Ethics and Compliance Statistics tool](#):

# Third-Party Due Diligence Evaluation Criteria



100%

Ownership  
information

99%

Past  
misconduct

96%

Sanctions and  
embargo lists

96%

General  
reputation

92%

Use of subs on  
work to be done

92%

E&C policy  
documentation

85%

Relationships w/  
public officials, etc.

85%

Employee  
training

79%

Information on  
related  
organizations

78%

Existence of an  
E&C function

72%

Third-party risk  
management  
practices

71%

Reporting  
requirement and  
mechanism

71%

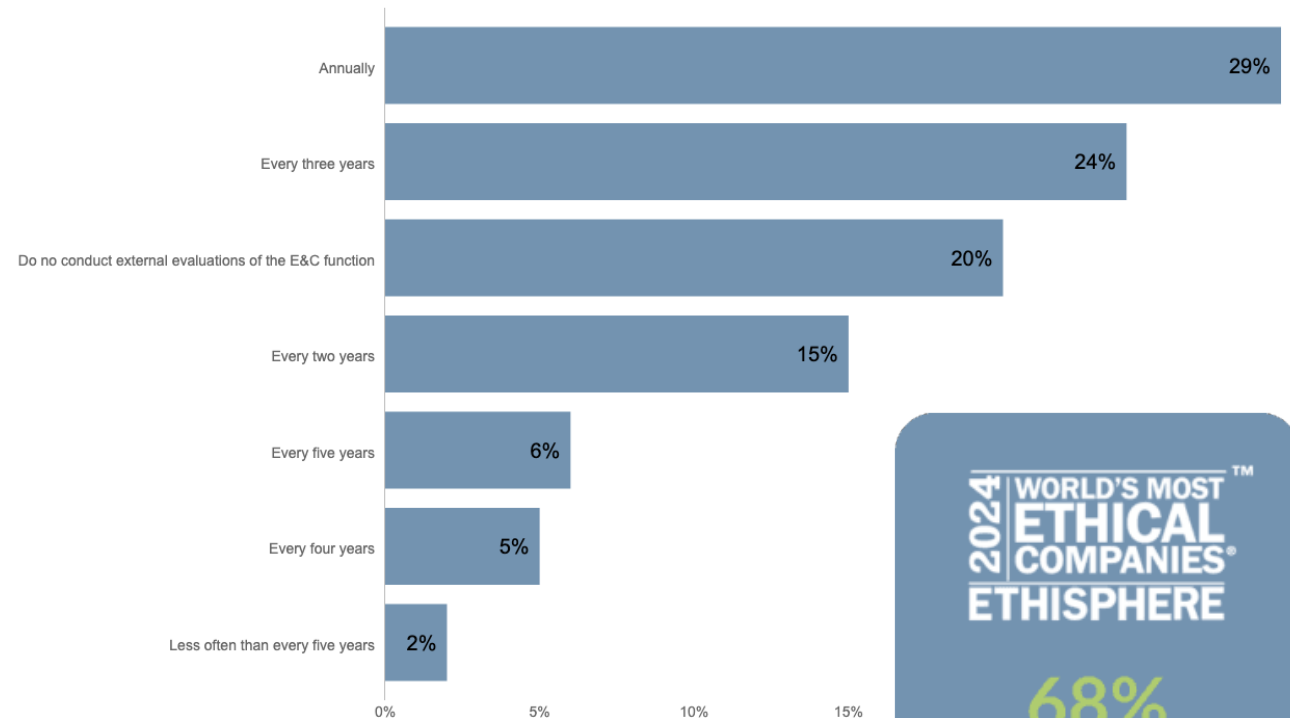
Risk assessment  
practices

Source: [The Sphere, Ethisphere's Benchmarking and Ethics and Compliance Statistics tool: Get access today](#)

## 2025 PLANNING STATS

In response to ongoing regulatory uncertainty, isn't it time to put fresh eyes on your program?

If your organization conducts periodic evaluations of the effectiveness of the entire E&C program using external resources (e.g., consultants), how often does your organization conduct evaluations of the effectiveness of the E&C program? -5.17



2024 WORLD'S MOST  
ETHICAL  
COMPANIES®  
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68%

conduct an external  
assessment of the  
E&C program at  
least every 3 years

Source: [The Sphere, Ethisphere's Benchmarking and Ethics and Compliance Statistics tool: Get access today](#)

2025 PLANNING STATS

# Make Informed, Evidenced-Based

As you finalize your 2025 plans, having the right data is just the beginning.

To help you take your insights further, we're offering a **free trial** of Ethisphere's benchmarking and data analysis tool, The Sphere.



**THE SPHERE**  
DATA. INSIGHTS. ACTION.

With The Sphere, you can dive deeper into industry benchmarks, compare your program to others, and uncover actionable insights that will empower your *decision-making*.

THE SPHERE

Request access to The Sphere to unlock over 250 data points, insights, and regulatory guidance