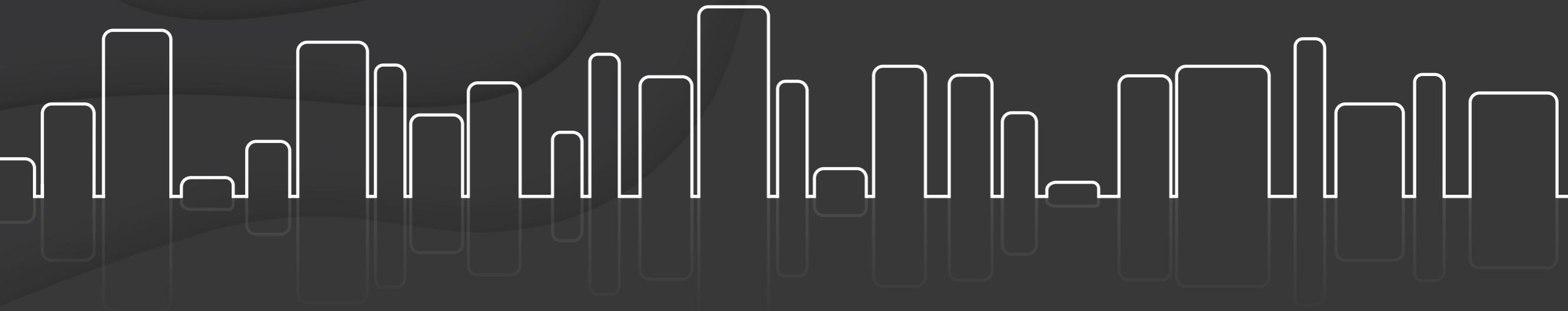


NORDIC BUSINESS ETHICS SURVEY 2022



A study of Nordic employees' perception
of ethics at work

Introduction	3
Respondent profile	4
How to read this report?	8
Foundations for an ethical working environment	9
Does ethics matter?	10
What we value the most	11
Ethics at work in practice	13
Observations of unethical behaviour at work	17
Observations of unethical behaviour	18
Types of unethical behaviour	21
Response to observations	24
Reasons for not speaking up	26
Retaliation	29
The ethical standards of an organization	33
Formal standards	34
Compromising ethical standards	38
Behind the survey	42

In this report we look at three aspects of ethics in our workplaces:

FOUNDATIONS FOR AN ETHICAL WORKING ENVIRONMENT

Our study results show, unsurprisingly, that most of us believe business ethics are important. We know from previous research that applying similar standards for everyone is crucial for an ethical working environment. We also know that a sense of fairness, transparent decision-making and psychological safety are important. In this section, we look at how these aspects are demonstrated in practice at all levels of an organisation.

OBSERVATIONS OF UNETHICAL BEHAVIOUR AT WORK

Even if we strive to be 100% ethical all the time, the real world and our organisations are complex. Most employees witness unethical behaviour at their workplaces and nearly half even witness behaviour that they consider to be against the law. Observations of misconduct are increasing, but so also is our willingness to intervene and speak up. In this section we look at actual observations, ethical compromises and speaking up. We also look at reasons for not intervening and retaliation.

THE ETHICAL STANDARDS OF AN ORGANIZATION

Code of conducts and whistleblowing channels are becoming the norm in many Nordic organisations. This development is driven by external reporting requirements, stakeholder expectations and new regulation. But formal documents and tools are not of value if these are not applied and used in practice. In this section we look at how organisations are implementing their ethical standards in practice. We see that many employees do not receive practical training and that surprisingly many are not aware that their organisation even has a Code of Conduct.

The Nordic Business Ethics Initiative is excited to launch our third survey on Nordic employee perceptions of ethics in the workplace. The first survey was published in spring 2019 and the second in autumn 2020. Much has happened in the world since the collection of data for our second survey in February 2020.



Nordic Business Ethics – an evolving initiative

Our plans were to release the 2020 survey with in-person events in Copenhagen, Helsinki, Oslo and Stockholm during spring 2020. We had to cancel these plans for obvious reasons. During the summer we were following the situation and decided to go virtual (as did many others). For us at the Nordic Business Ethics Initiative this became a game changer. Our virtual survey launch was attended by close to 700 individuals from over 20 countries. Since then, we have hosted more than 10 virtual events, which have been followed by over 3000 individuals and we have over 1,000 members in our network who share our passion for more ethical organisations all over the globe. The Nordic approach to business ethics seems to be of interest among the Nordics and beyond. This year we have included Estonia in the survey and also made a limited request-based survey in Greenland.

Why Nordic Business Ethics matters

The purpose of this survey has always been to raise awareness and spur fact-based discussions about ethics in the workplace. In a Nordic setting we may be inclined to think we “have great values,” “have an ethical backbone” and that it is “common sense” for us to act in an ethical manner. And this is both correct and needs to be corrected. We should be proud of our transparent societies, good governance and trust-based culture – which are something unique. At the same time, we must stay alert to how global business works, the pitfalls, risks and importance of understanding that no individual can be 100% ethical all of the time. We need to train our ethical muscles and challenge ourselves to raise concerns and take responsibility for the wider consequences of our decisions.

Are our workplaces more ethical today than two years ago?

In this report we look at the foundations for an ethical working environment, observations of unethical conduct as well as standards for an ethical organisation. With everything that is going on around us we seem to value ethical working

environments even more – female workers seem to appreciate them even more than their male counterparts (87% vs. 79%).

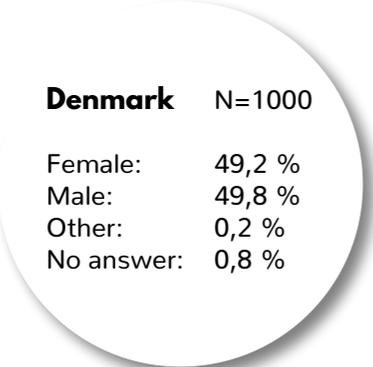
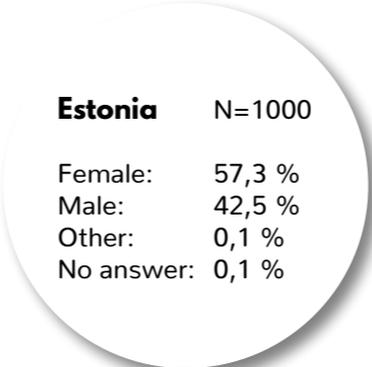
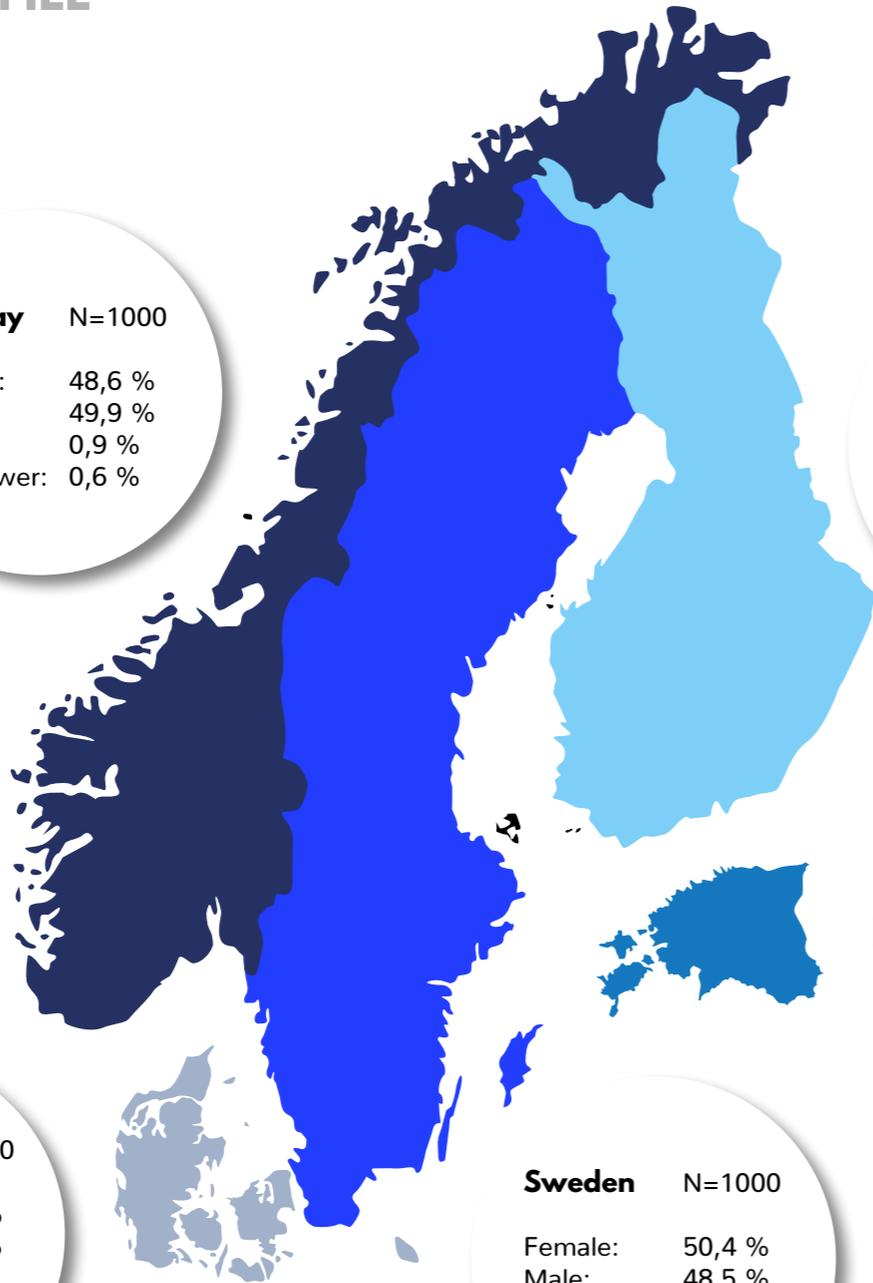
Whether it is the impact of the EU Whistleblowing directive or something else we see a dramatic increase in interventions into misconduct, which we seem to tolerate less. And that is a good thing. The question, however, is whether organisations are capable of dealing with these concerns in a professional way. This year we included a question on retaliation and see that senior management most frequently report being retaliated against when raising a concern. Every second senior manager reports being retaliated against (54.5%). Even if we are much more inclined to intervene, we have also witnessed more frequent misconduct than reported in 2020. One interesting observation is that men report observing more sexual harassment than their female counterparts (32% vs. 45%), we also see more observations of bribery and corruption than reported in 2020. This does not necessarily mean that our workplaces have become less ethical, it may also mean that we are more sensitised to identifying unethical behaviour.

Finally, the survey showed that we are concerned about the level of training and awareness in our organisations, with less than half of respondents saying they have been trained and they are aware of their organisations Code of Conduct. This lack of training and awareness also applies to stock listed companies, where we would argue that most do have a Code of Conduct, at least on their public web page. To ensure this is not a wasted investment more work is needed to ensure that the Code of Conduct becomes a reality right across organisations.

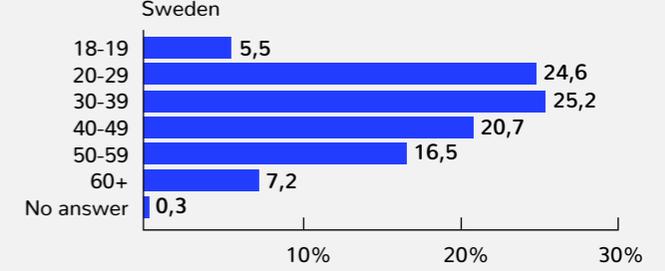
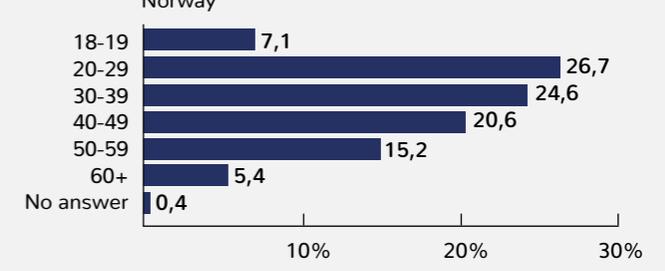
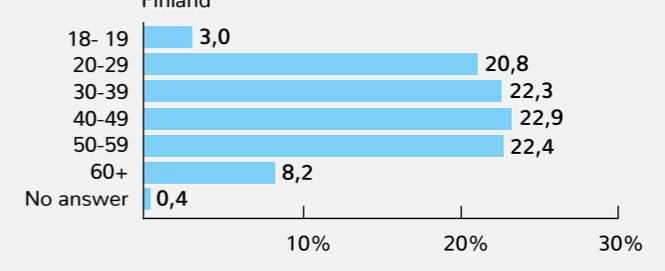
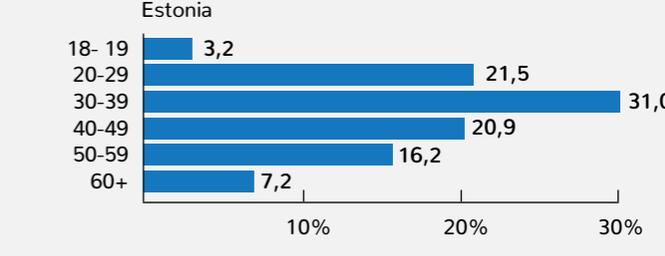
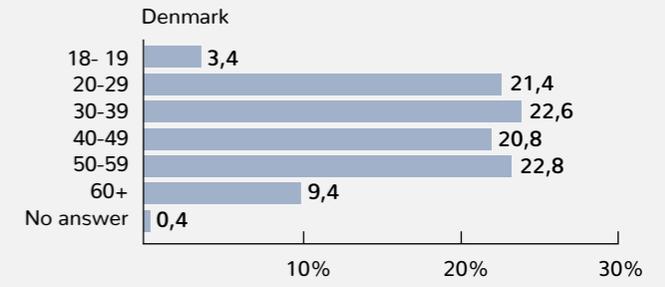
We hope that you find this report insightful and that it will lead to productive discussions on how to advance ethics in our workplaces even further!

Anna & Niina

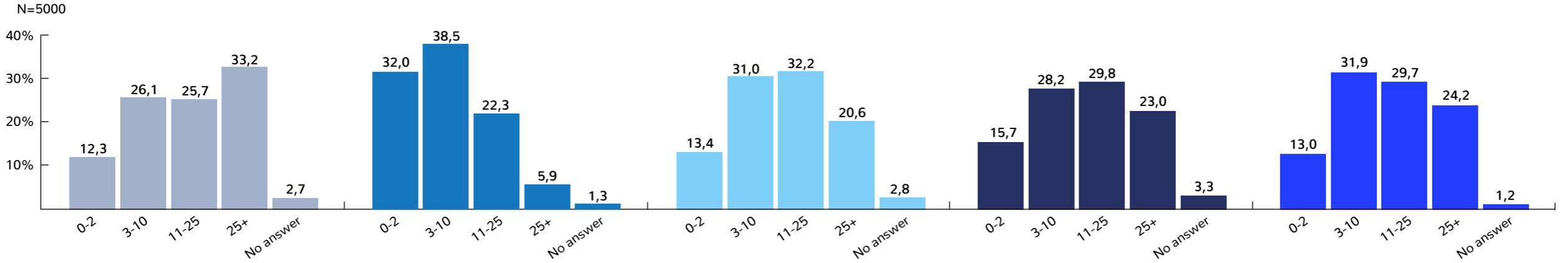
Founders of the Nordic Business Ethics Initiative



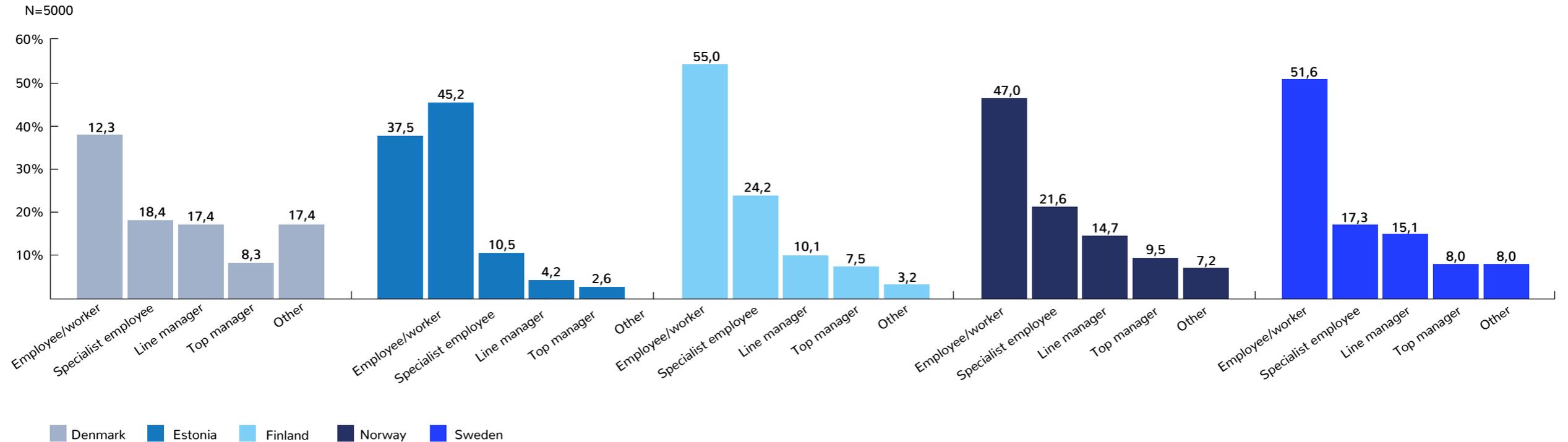
How old are you?



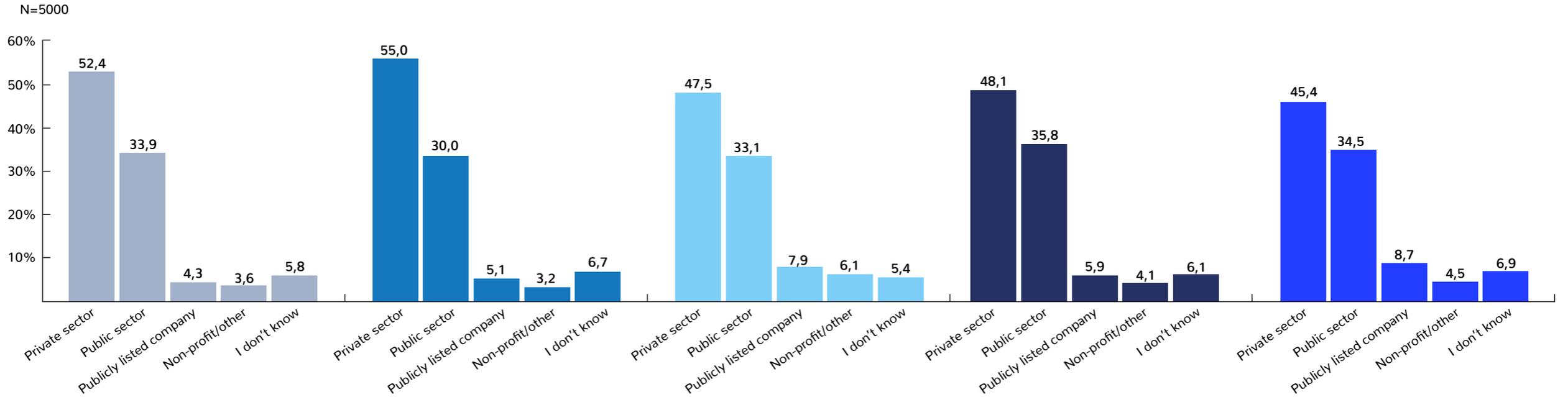
For how many years have you been in the working life (part-time or full-time)?



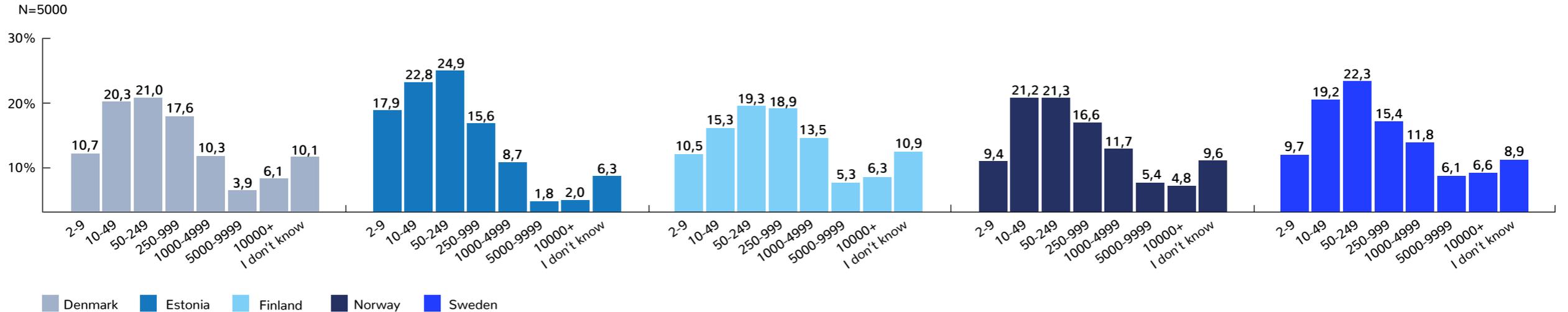
What is your role in the organization that you work for?



Which alternative is most suitable to describe the organization that you work for?

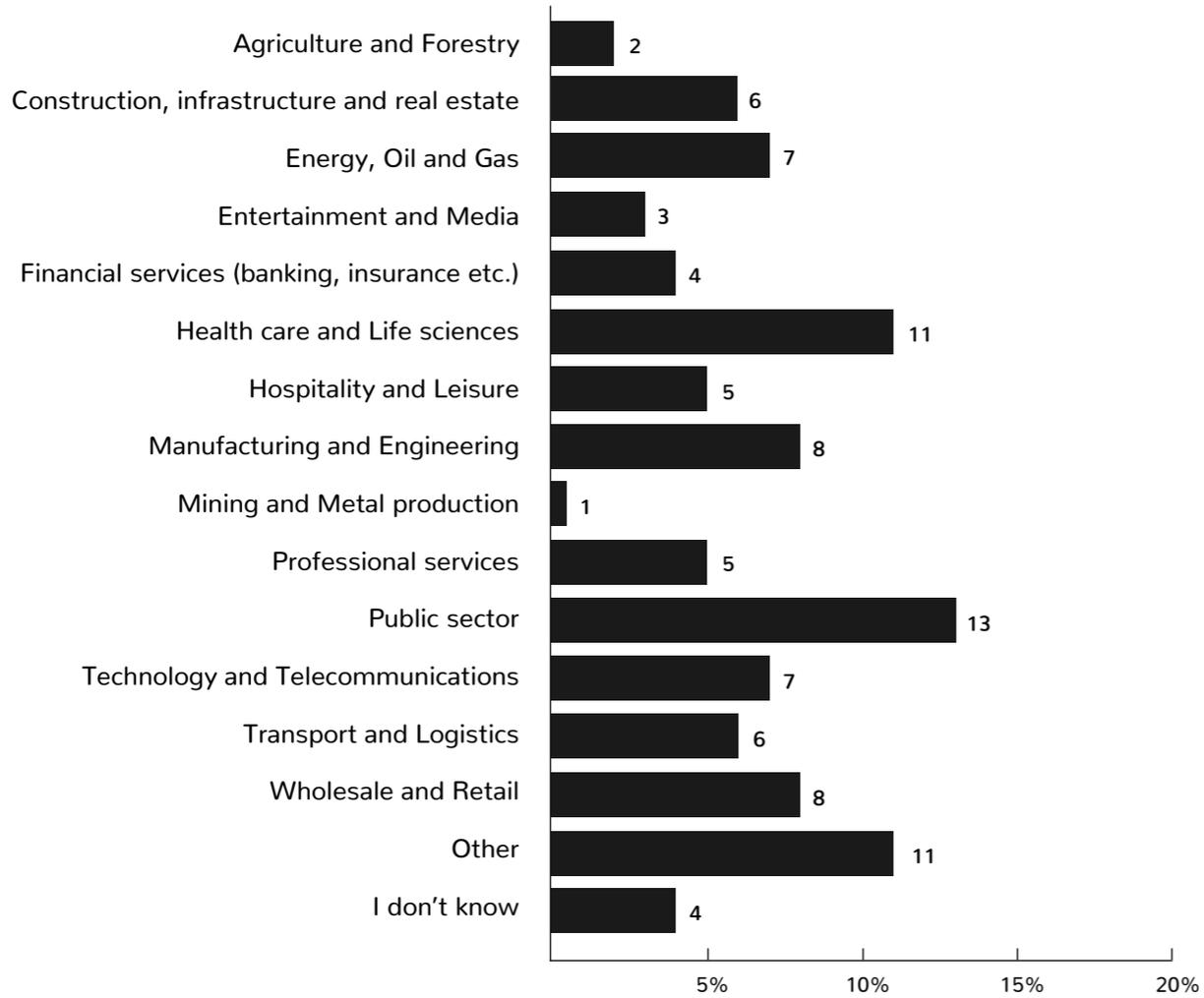


How many employees are there in the organization that you work for?



Which alternative is most suitable to describe the sector of your organization? – all countries

N=5000



You are looking at the third Nordic Business Ethics Survey report. In the report, you will find many familiar questions from the previous years and also a few new ones. This year we have added Estonia to the scope of traditional Nordic countries.

Here are a few tips to consider when reading the report.

Survey data was gathered via online panel methodology during June 2022. Feedback was used as an external data collection service provider to conduct the data gathering. Read more at www.feelback.com

New question 2022



We have added some new questions for 2022.

Changed question



We have made some adjustments to some of the “old” questions from the 2020 and 2019 surveys. This may impact the responses, which should be kept in mind when looking at the comparative figures (or when comparing the results for 2019 / 2020 reports).

Nordic average

Nordic average figures always refer to the total number of Nordic respondents (n=4000), including the responses from Denmark, Finland, Sweden and Norway.

Definition of roles

Top manager: senior-level executive of an organisation

Line manager: a person with direct managerial responsibility for a particular employee

Specialist employee: expert on a specific aspect of a job, without having managerial responsibilities

Employee/worker: a person who does a specified type of work or who works in a specified way

FOUNDATIONS FOR AN ETHICAL WORKING ENVIRONMENT

KEY TAKE AWAYS

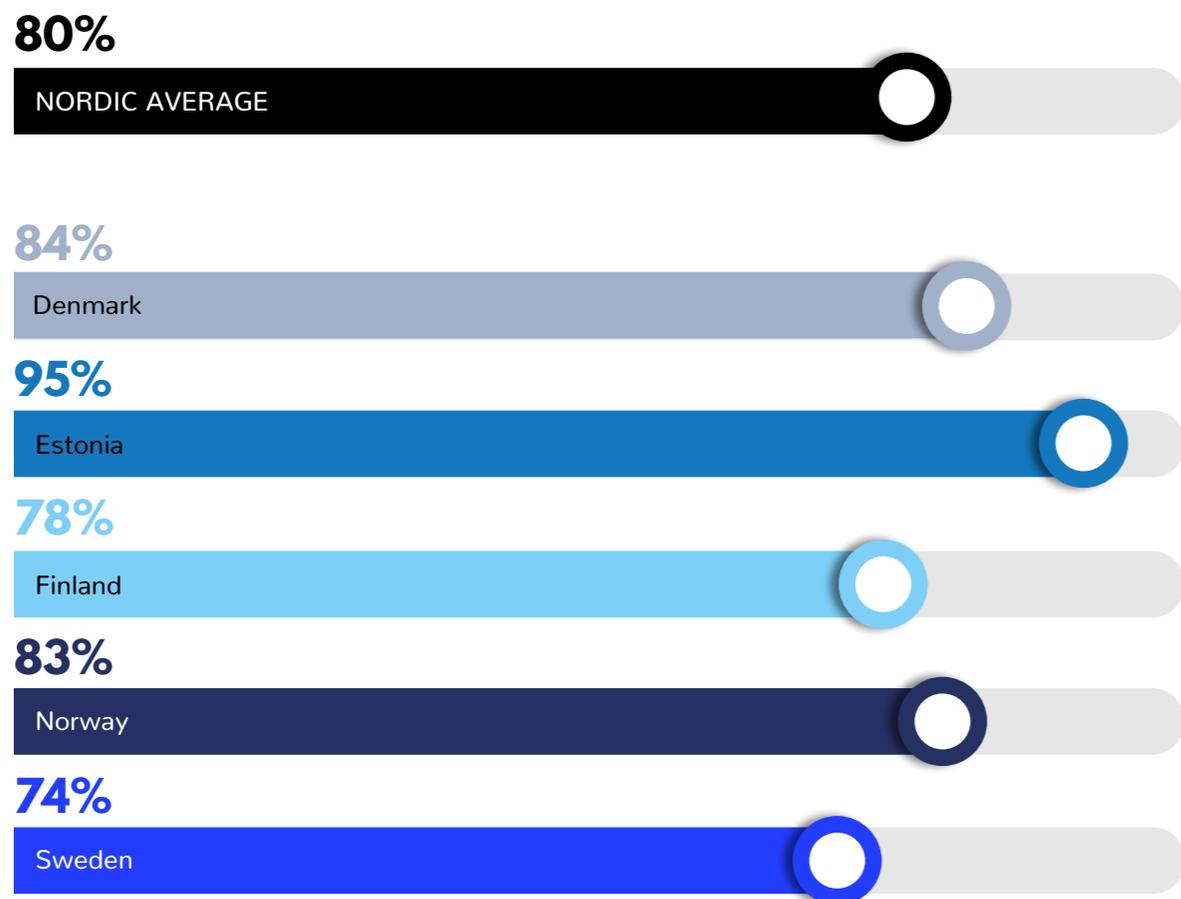


DOES ETHICS MATTER?

When considering ethical business conduct, it is always good to keep in mind that most of us believe it is important to act ethically, although we face a number of situations in work life where this belief is in conflict with our experiences. 80% of the study respondents said that ethical behaviour is important. Only 2% responded that it is not important at all. When looking at the question from the role perspective, specialists, employees and workers value ethical behaviour marginally higher than managers.

Ethical behavior at work is important to me – by country

% of respondents (4890) who chose important, fairly important or very important



Ethical behavior at work is important to me – by role

% of respondents (4537) who chose important, fairly important or very important



How important do you consider the following aspects? – by country

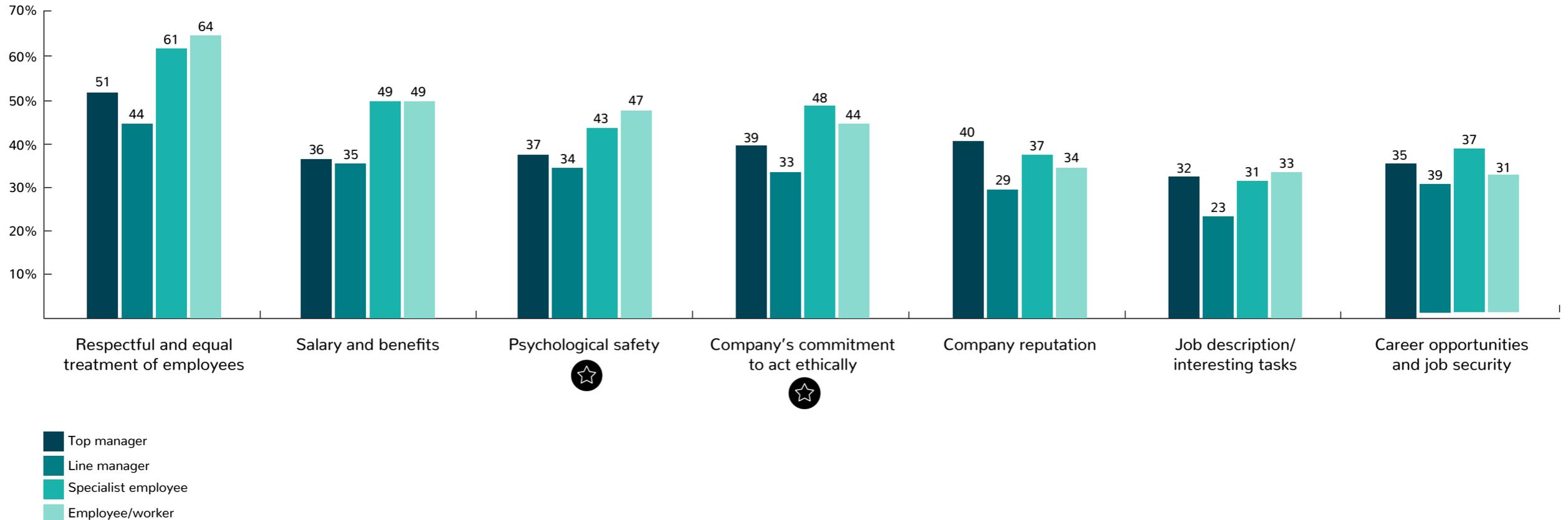
% of respondents who chose important, fairly important or very important

	NORDIC AVERAGE	Denmark	Estonia	Finland	Norway	Sweden
Respectful and equal treatment of employees	85%	86%	96%	91%	85%	79%
Salary and benefits	83%	84%	96%	90%	79%	80%
Psychological safety	82%	82%	90%	87%	79%	79%
Company's commitment to act ethically	79%	80%	95%	85%	81%	72%
Company reputation	77%	74%	93%	84%	78%	73%
Job description/interesting tasks	76%	75%	83%	88%	68%	74%
Career opportunities and job security	73%	68%	93%	87%	69%	69%

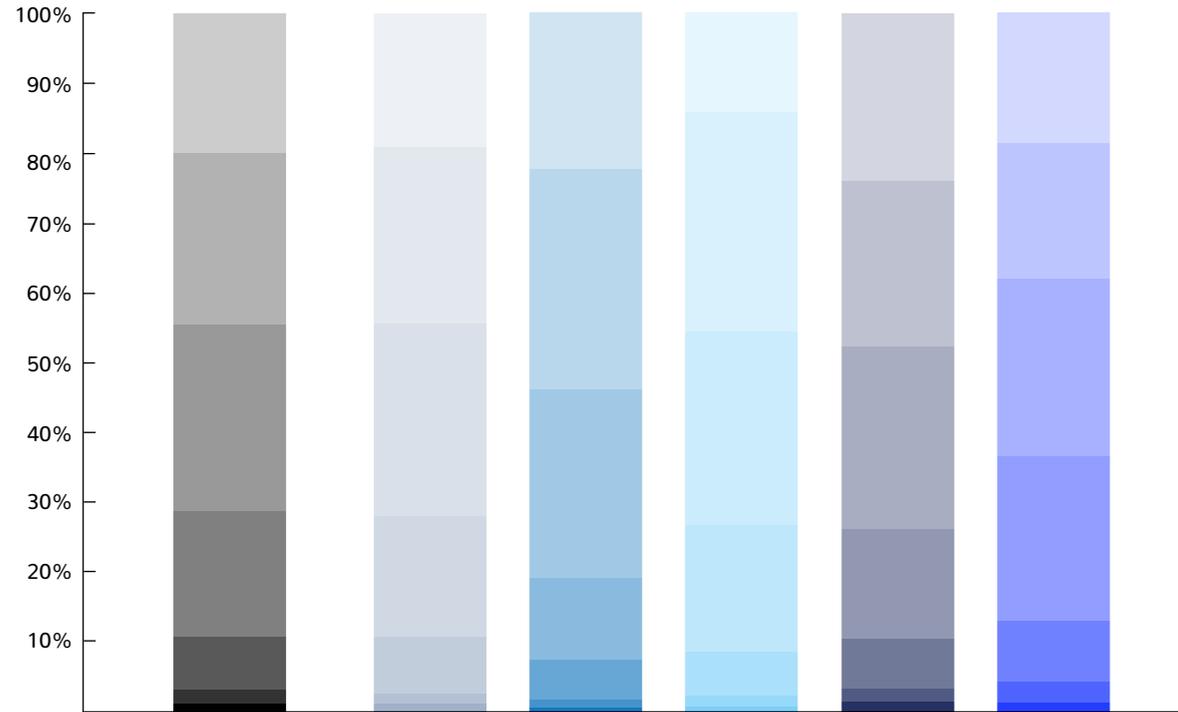
WHAT WE VALUE THE MOST?

In 2020, we asked respondents to choose which aspect of their work was the most important. This year, we gave the possibility to evaluate all available aspects. The result was the same: respectful and equal treatment of employees is the most important aspect. (In 2020, 48% of all respondents chose this aspect as the most important.) This year, we added two new aspects – psychological safety and the company’s commitment to acting ethically. Both of these aspects were more important to employees and workers than to managers. The same applies to respectful and equal treatment and salary and benefits.

“The following aspect of work is very important to me” – by role (N=3897)

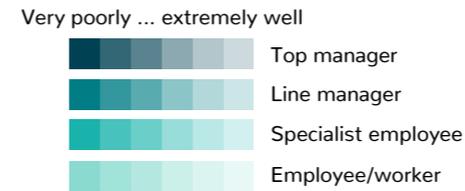
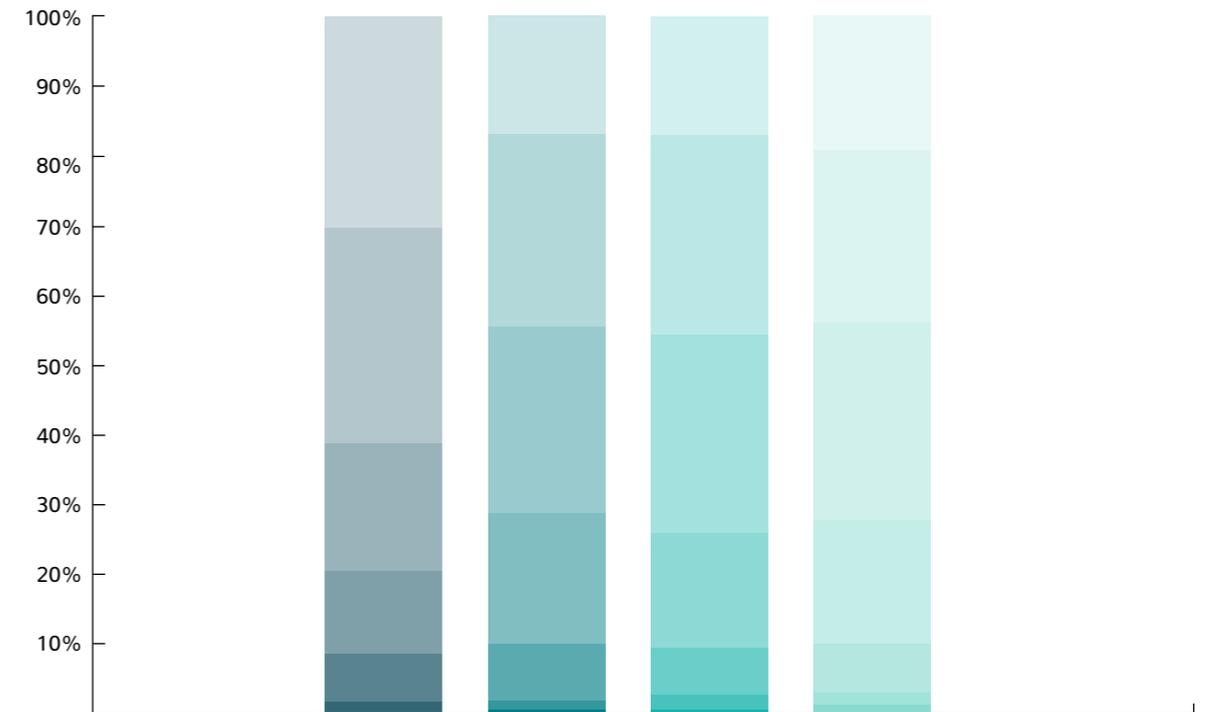


How well is ethical behavior demonstrated in your organization? – by country (N=4730)



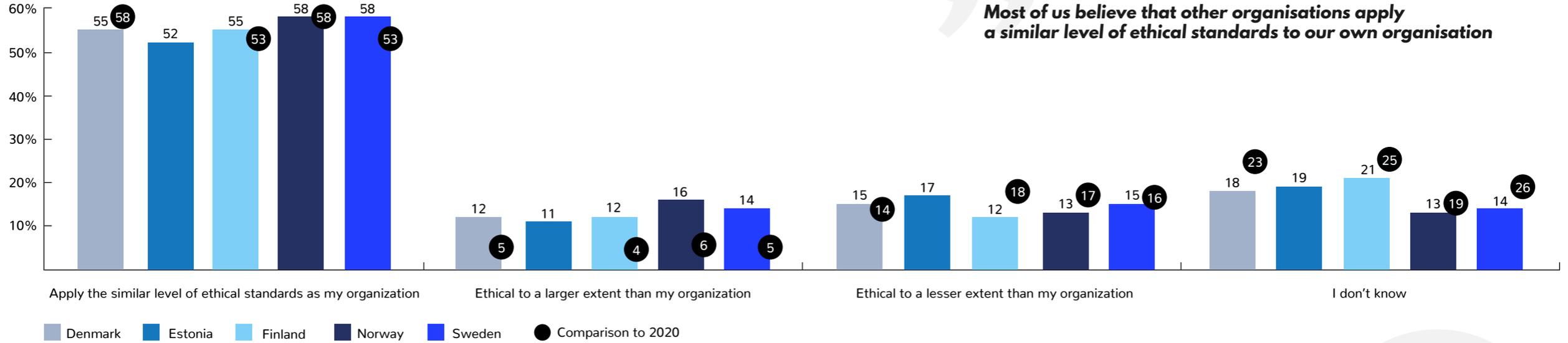
20%
of the Nordic respondents experienced ethical behaviour demonstrated extremely well in their organisations.
(Denmark 19%, Finland 14%, Norway 24%, Sweden 19%)

How well is ethical behavior demonstrated in your organization? – by role (N=4425)

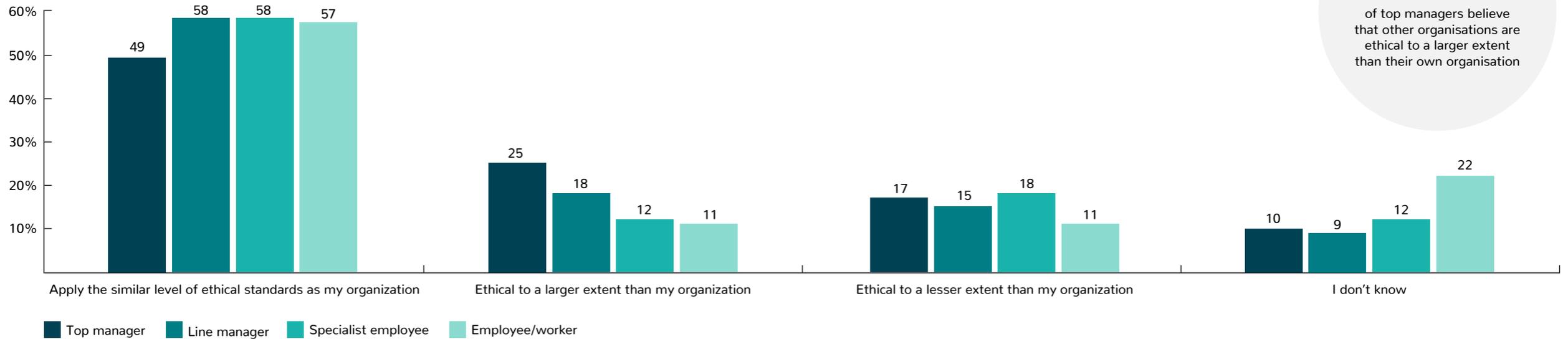


30%
of the top managers experienced ethical behaviour demonstrated extremely well in their organisations, whereas only 19% of line managers, 17% of the specialists and 19% of employees felt the same way.

How do you perceive other organisations around you? – by country (N=4016)

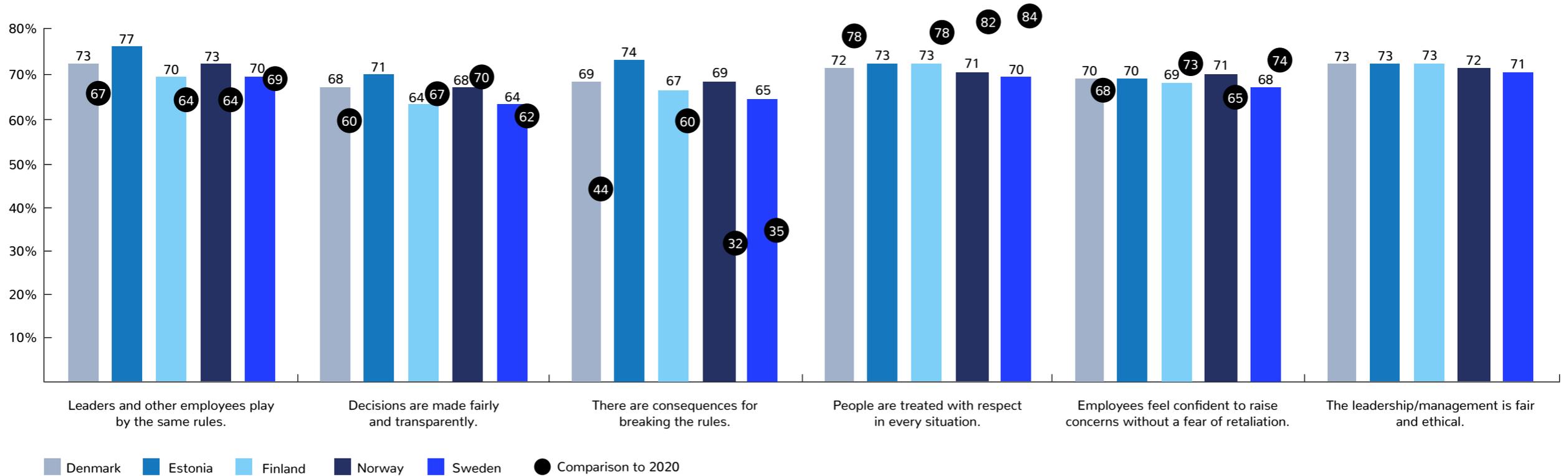


How do you perceive other organisations around you? – by role (N=3775)



How do you perceive that the following situations are currently displayed in your organization? – by country

% of respondents who selected somewhat agree, agree or strongly agree



Key changes compared to 2020

In all countries, the perception that employees and leaders play by the same rules has increased to

72%

(Nordic average vs 66% in 2020)

The perception of the consequences for breaking the rules also increased in 2022:

68%

(Nordic average vs 43% in 2020)

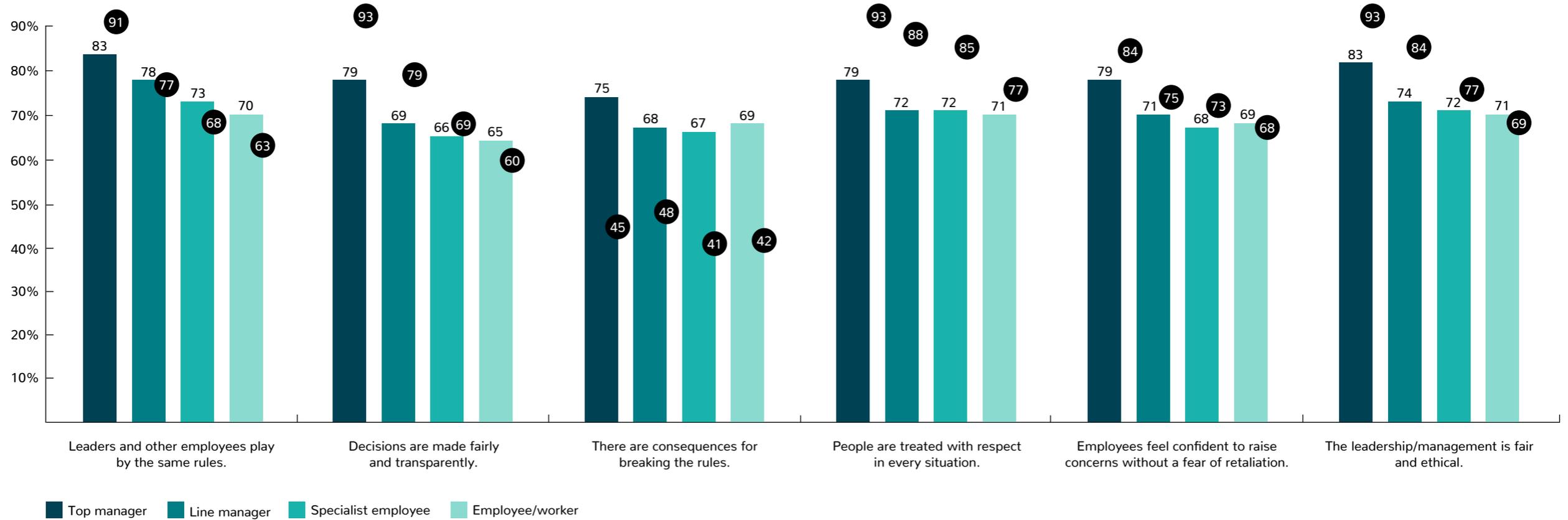
On the other hand, less respondents feel that people are treated with respect in every situation:

71%

(Nordic average vs 80% in 2020)

How do you perceive that the following situations are currently displayed in your organization? – by role

% of respondents who selected somewhat agree, agree or strongly agree



OBSERVATIONS OF UNETHICAL BEHAVIOUR AT WORK

KEY TAKE AWAYS

53%

observed unlawful activities

67%

have observed favouritism (most common) – observations of unethical behaviour have increased since 2020

35%

of respondents in Finland say that they won't speak up – making them the least likely to speak up among the Nordics

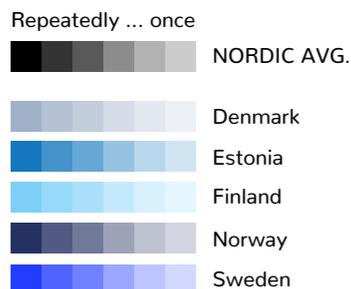
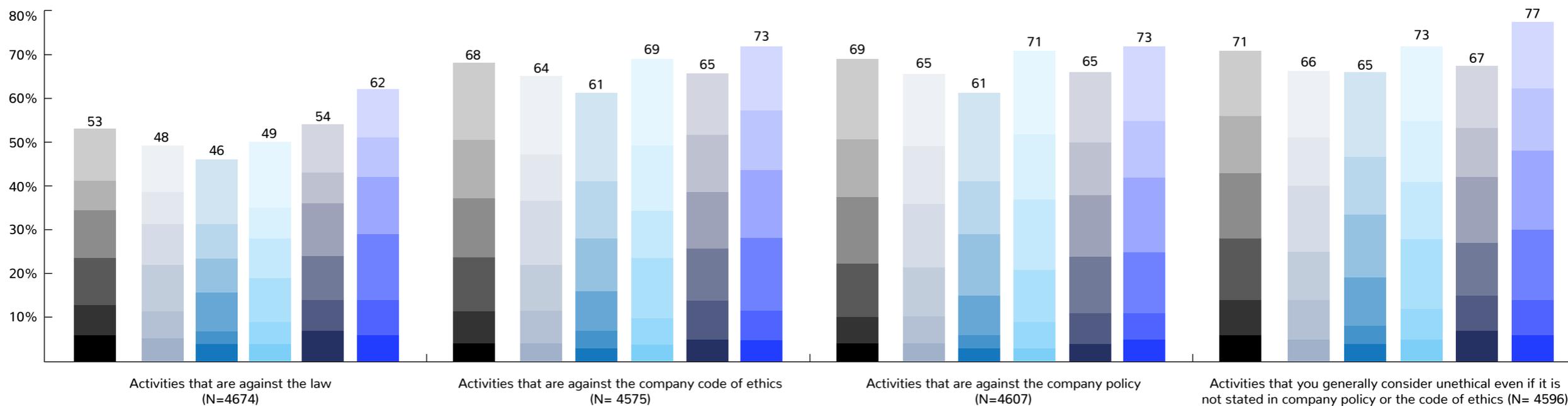
55%

of top managers perceived retaliation for speaking up (37% Nordic total)

Which of the following conduct have you observed at your workplace during the past 12 months? – by country

Respondents had observed the activities, once or more often.

In 2020, we asked this same question as a yes/no question. As a result, only 8% had observed activities against the law, 14% activities against the code of conduct, 19% activities against company policy and 22% observed activities considered unethical even if not stated in company policies. This year, we gave respondent the possibility to choose frequency of observations, and, as the above picture shows, the result was very different: over half of respondents had observed unlawful activities and almost 70% other forms of activities.

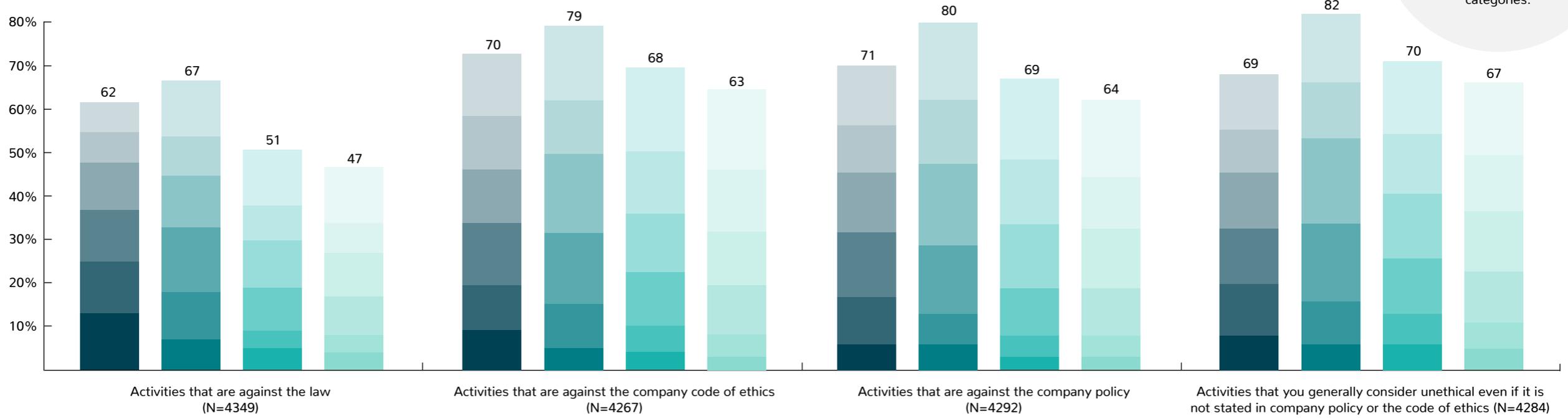


Every second person has observed unlawful activities during the past 12 months.

Which of the following conduct have you observed at your workplace during the past 12 months? – by role

Respondents had observed the activities, once or more often.

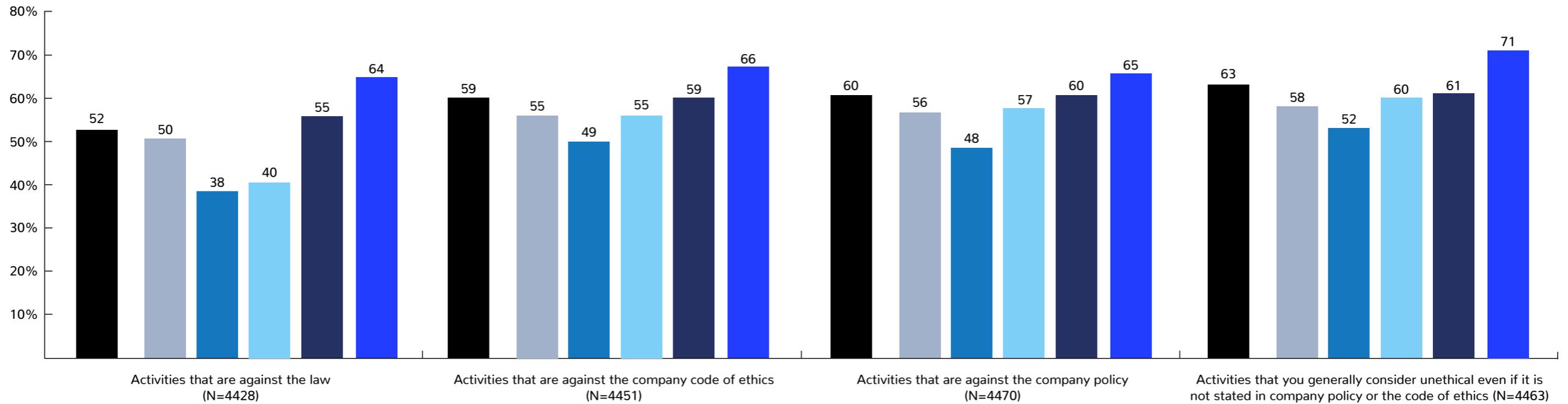
76%
of the 18-29-year old respondents observed activities against the law. This trend was similar in all categories.



Younger generations observe unethical behaviour more often than older

Have you, during the past 12 months, observed that your line manager was involved in any of the following conduct? – by country

Respondents had observed the activities, once or more often.



Line managers are involved in more than half of the unethical behaviour experienced

Have you, during the past 12 months, observed any of the following conduct in your organization?

	Nordic average 2022	Nordic average 2020	Nordic average 2019	Denmark	Estonia	Finland	Norway	Sweden
Favoritism and nepotism	67%	46%	55%	62%	62%	68%	64%	75%
Disrespectful behaviour	67%	56%	69%	64%	61%	71%	64%	72%
Passive leadership or leadership that contradicts corporate values	66%	48%	57%	64%	60%	65%	63%	73%
Distorting facts	66%	42%	53%	58%	60%	68%	62%	73%
Protecting poor management and governance	64%	47%	52%	62%	60%	63%	62%	68%
Discrimination and bullying	60%	35%	46%	56%	50%	61%	57%	66%
Jeopardizing safety at work	59%	34%	42%	56%	53%	58%	54%	67%
Leakage or misuse of confidential information	53%	18%	24%	45%	44%	52%	51%	62%
Stealing from work (e.g. taking office equipment home)	52%	25%	35%	48%	33%	52%	50%	58%
Irresponsible use of company assets (e.g. ignoring tendering procedures, unnecessary sponsoring or travelling, discounts for close relatives)	52%	18%	24%	44%	45%	52%	52%	61%
Doing business with unethical organisations/third parties	48%	11%	-	44%	35%	48%	46%	56%
Adding personal expenses to expense reimbursements	45%	8%	10%	42%	37%	38%	44%	56%
Sexual harassment	43%	11%	16%	40%	22%	37%	43%	50%
Using questionable/illegal workforce	41%	7%	-	38%	28%	34%	42%	52%
Giving, asking for, receiving bribes	39%	18%	13%	35%	21%	32%	40%	50%

TOP THREE OBSERVATIONS BY SECTOR

The observations of unethical behaviour has significantly increased from 2020 and 2019.

Public sector

1. Disrespectful behaviour

72%

2. Favoritism and nepotism

71%

3. Distorting facts

69%

Private sector

1. Favoritism and nepotism

63%

2. Passive leadership or leadership that contradicts corporate values

63%

3. Disrespectful behaviour

62%

Publicly listed companies

1. Disrespectful behaviour

78%

2. Passive leadership or leadership that contradicts corporate values

75%

3. Favoritism and nepotism

75%

Non-profit/other

1. Disrespectful behaviour

62%

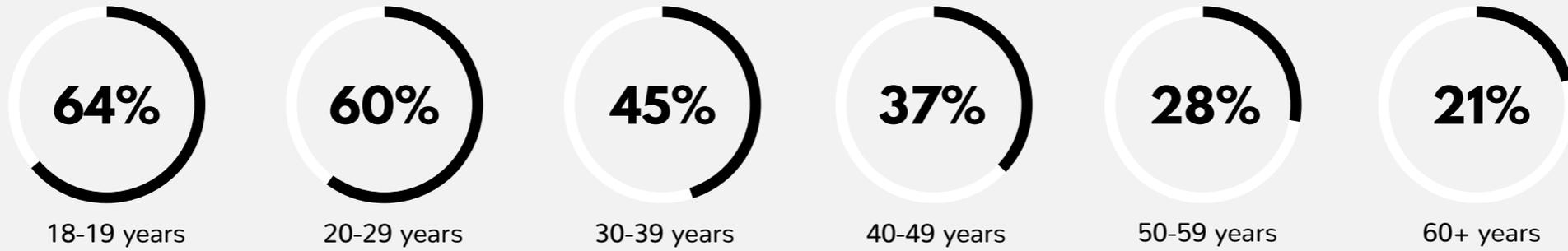
2. Favoritism and nepotism

62%

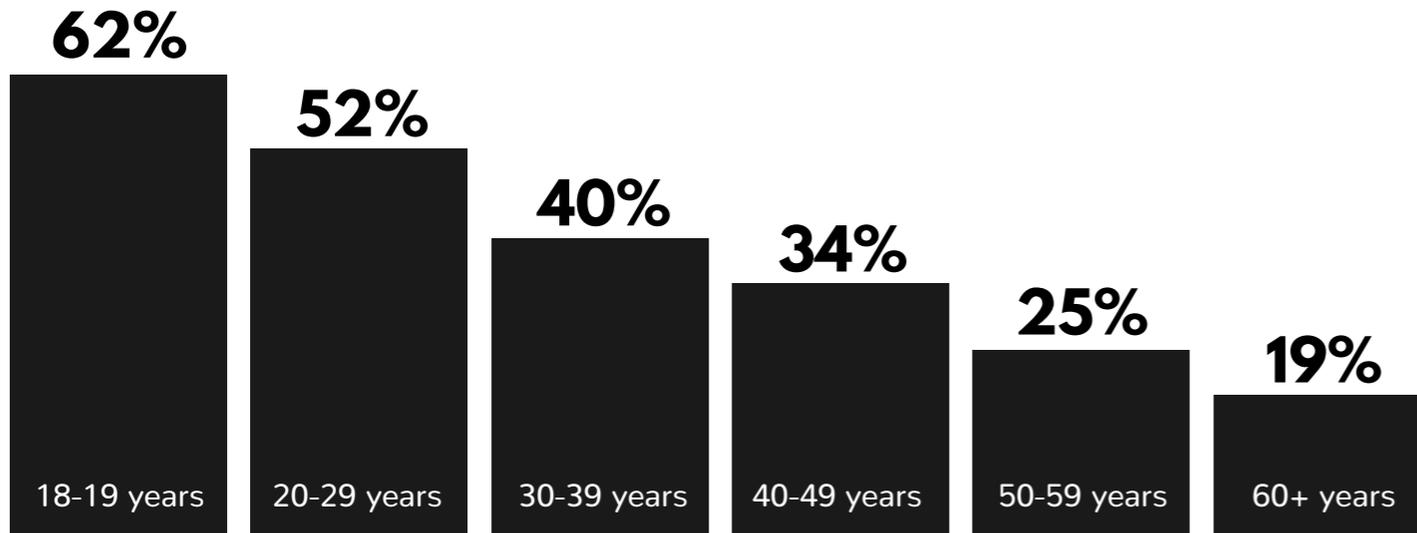
3. Protecting poor management and governance

59%

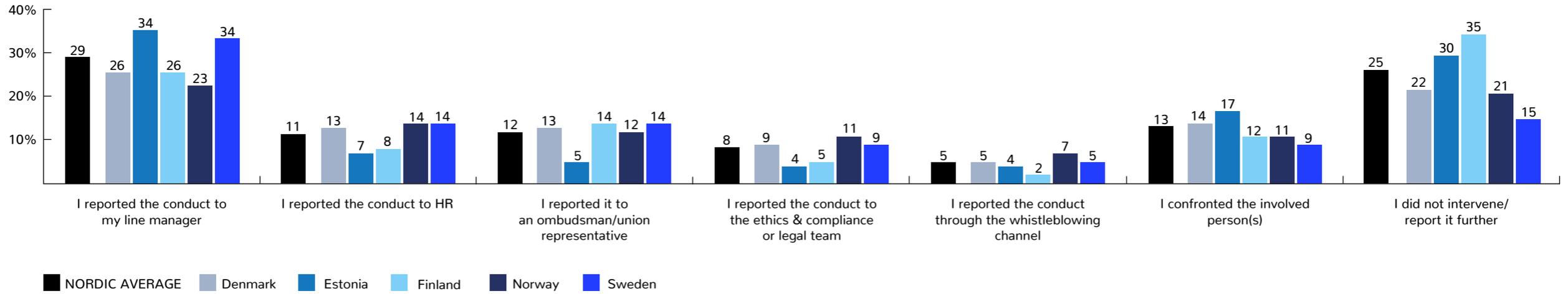
Observations of adding personal expenses to expense reimbursements – by age



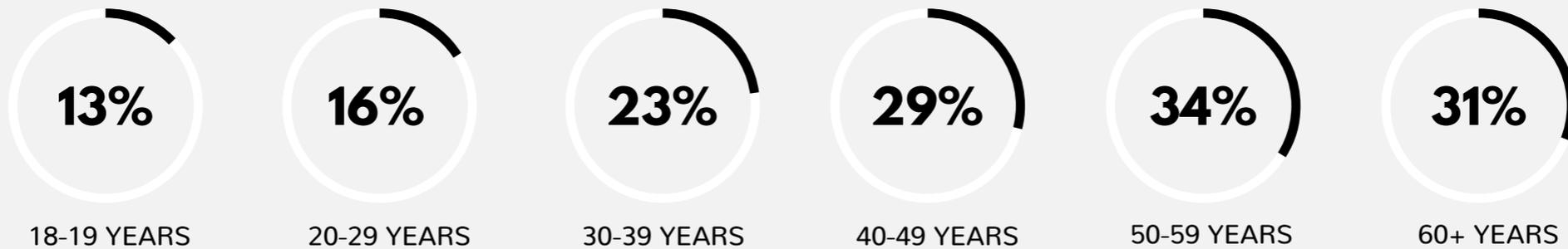
Observations of sexual harrasment – by age



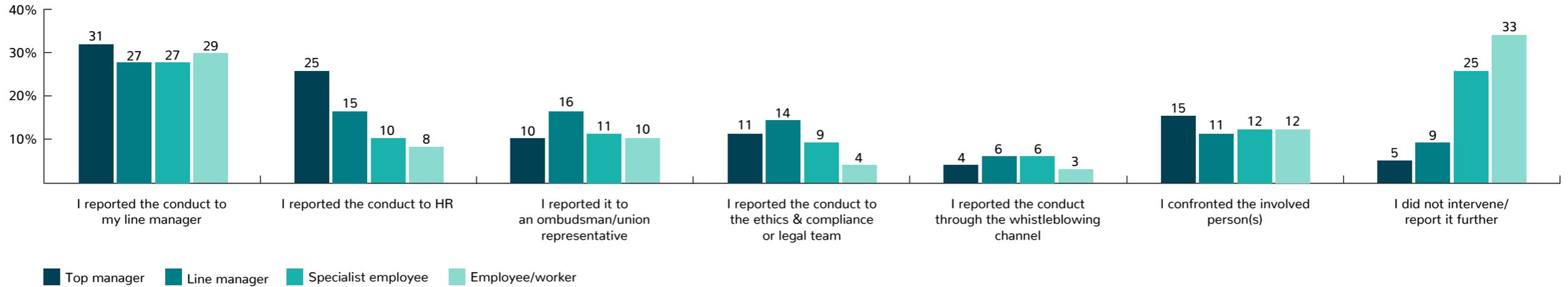
Think about how you reacted when you last time observed any of the above mentioned conduct. What did you do? - by country (N= 3461)



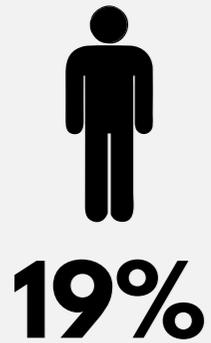
Younger generations are more likely to speak up: “I did not intervene or report it further” - by age



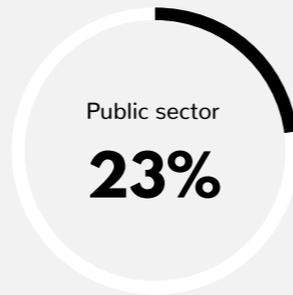
Think about how you reacted when you last time observed any of the above mentioned conduct. What did you do? - by role (N=3270)



Women are less likely to intervene to observed unethical conduct than men



“I did not intervene” - by sectors



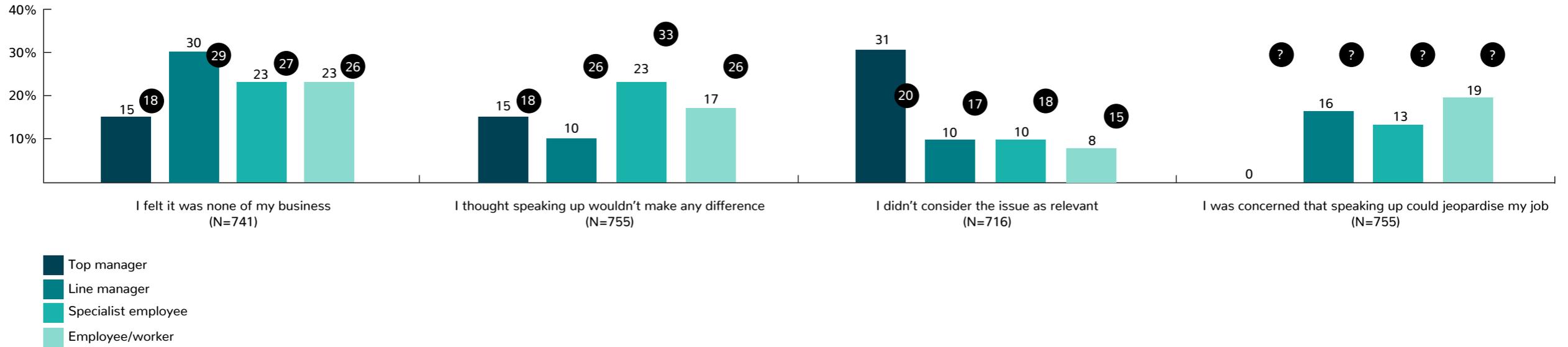
How likely the following reasons impacted your decision not to raise the concern? – by country

	Nordic average 2022	Denmark	Estonia	Finland	Norway	Sweden
I thought speaking up wouldn't make any difference	65%	65%	72%	72%	66%	58%
I didn't want to be seen as "the difficult person"	57%	56%	66%	64%	55%	56%
I felt it was none of my business	54%	58%	65%	69%	46%	53%
I was concerned that speaking up could jeopardize my job	42%	41%	53%	51%	42%	36%
I thought the relevant parties were already aware of the issue	38%	44%	53%	41%	34%	38%
I didn't know who to contact	35%	42%	39%	33%	37%	25%
I didn't consider the issue as relevant	32%	32%	40%	33%	35%	24%
I thought it was common practice	30%	21%	37%	35%	40%	13%
The conduct involved my line manager	28%	27%	38%	35%	28%	24%
I believed someone else would act on it	27%	26%	28%	30%	24%	32%
I knew that someone else had reported or was taking care of it	24%	24%	28%	27%	25%	17%

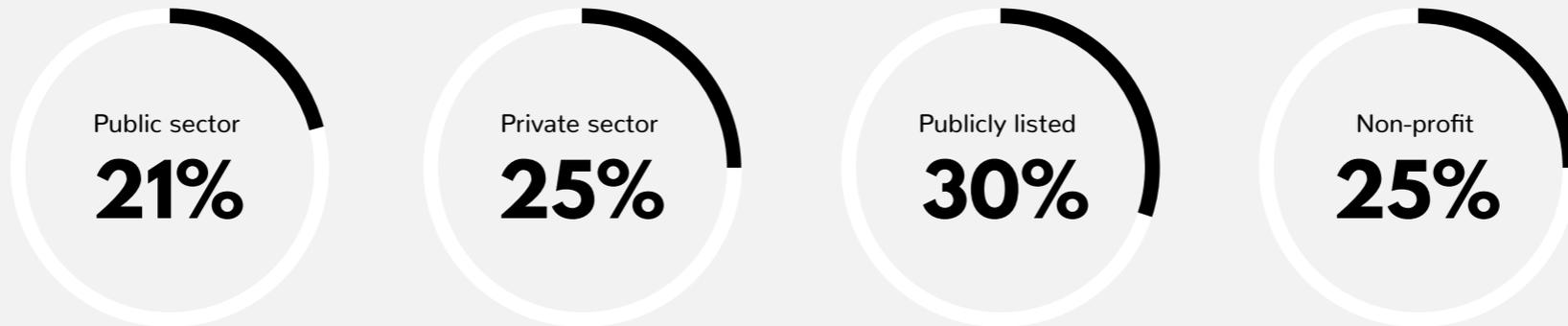
What was the main reason you did not raise the concern? – by country

	Nordic average 2022	Nordic average 2020	Nordic average 2019	Denmark	Estonia	Finland	Norway	Sweden
I felt it was none of my business	21%	16%	15%	23%	27%	25%	19%	20%
I thought speaking up wouldn't make any difference	21%	18%	24%	17%	16%	17%	26%	18%
I was concerned that speaking up could jeopardize my job	15%	9%	14%	16%	20%	15%	14%	17%
I didn't want to be seen as "the difficult person"	12%	6%	5%	8%	8%	12%	11%	15%
I didn't consider the issue as relevant	8%	11%	10%	9%	10%	9%	6%	9%
I thought it was common practice	6%	3%	5%	2%	3%	2%	10%	3%
The conduct involved my line manager	5%	4%	-	11%	6%	7%	2%	5%
I believed someone else would act on it	4%	1%	0,5%	3%	1%	3%	5%	4%
I thought the relevant parties were already aware of the issue	3%	4%	10%	6%	4%	3%	2%	1%
I knew that someone else had reported or was taking care of it	3%	11%	-	2%	2%	5%	2%	5%
I didn't know who to contact	2%	2%	4%	4%	3%	2%	2%	4%

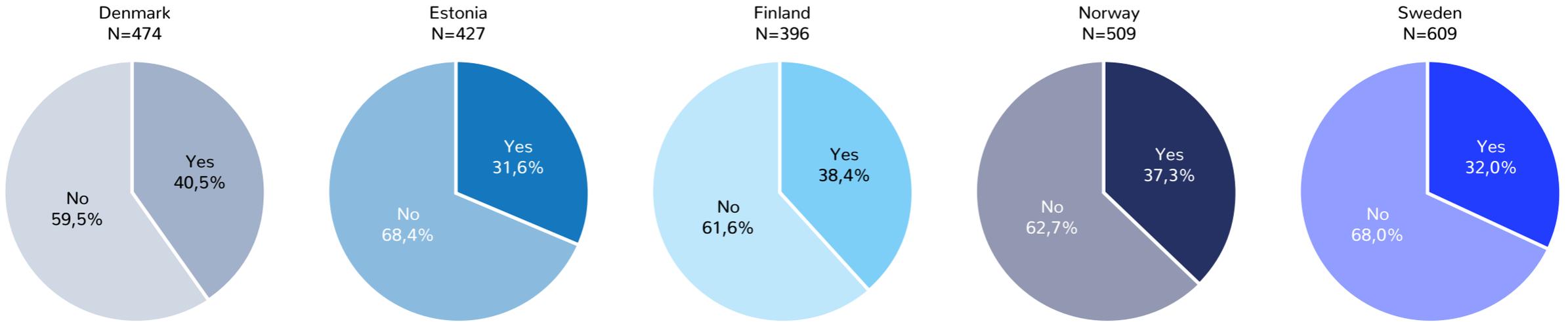
Four most common reasons why respondents in different roles did not intervene in unethical conduct in the workplace – by role



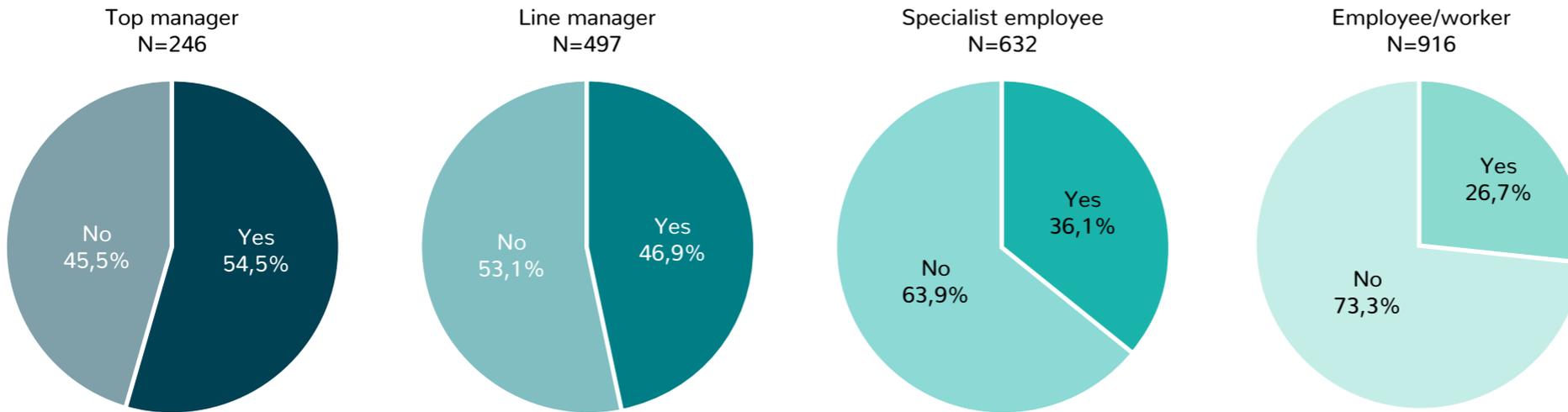
"I felt it was not my business" was the most common reason in all of the sectors



Did you experience any personal disadvantage or retaliation after raising your concern about the unethical conduct? – by country



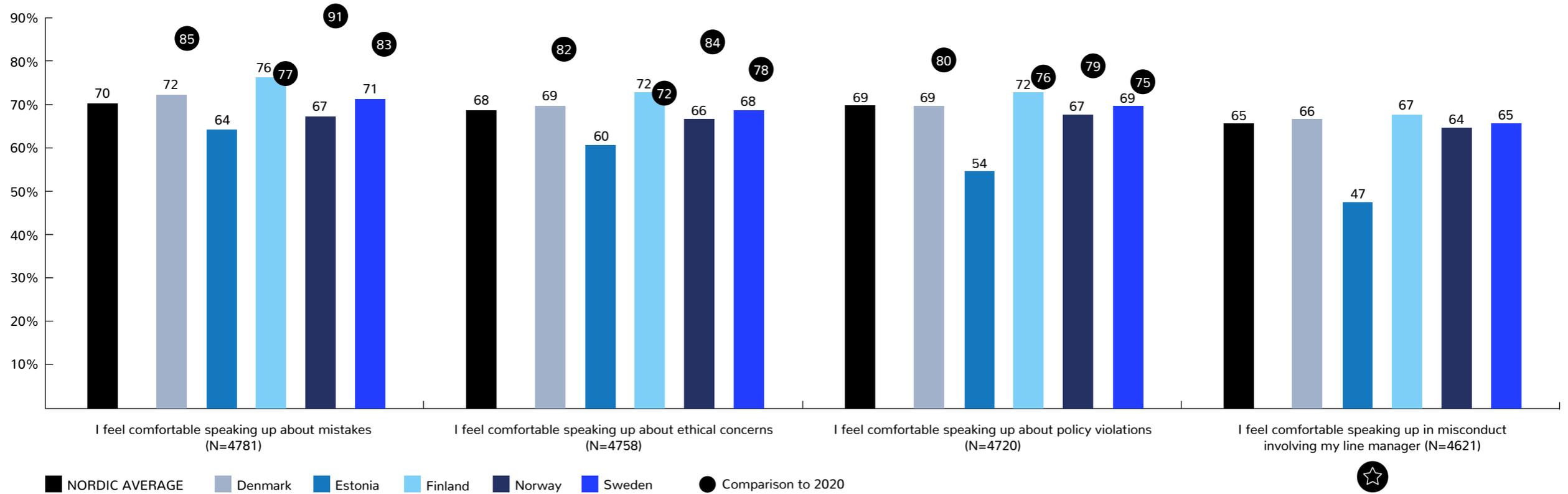
Did you experience any personal disadvantage or retaliation after raising your concern about the unethical conduct? – by role



Over **50%** of top managers experience retaliation for raising concerns.

Comfortability for speaking up – by country

% of respondents who chose somewhat agree, agree or strongly agree

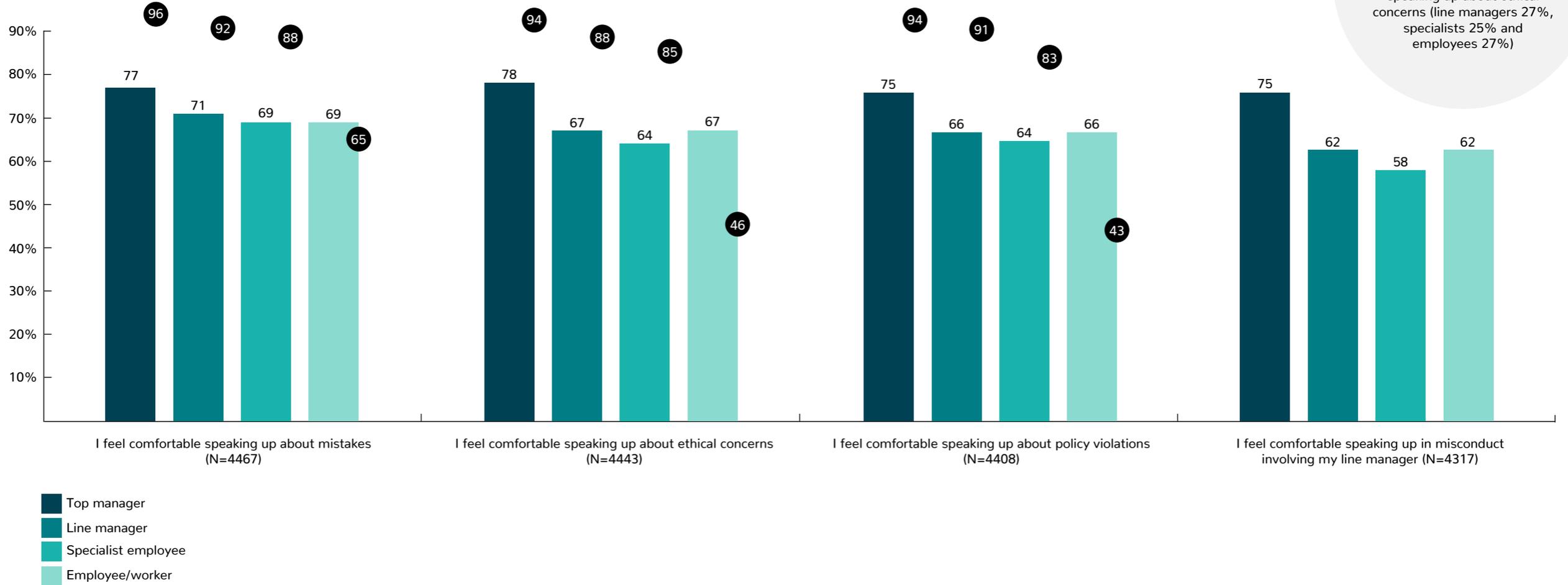


Younger generation feel less comfortable for speaking up about ethical concerns: % of respondents who strongly agree



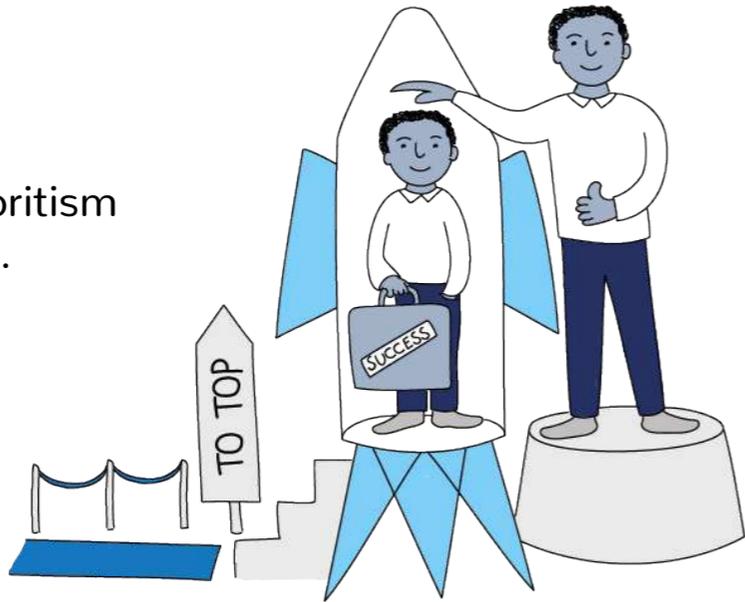
Comfortability for speaking up – by role

% of respondents who chose somewhat agree, agree or strongly agree



67%

observed favoritism and nepotism.



60%

observed discrimination and bullying.



52%

observed stealing from work.

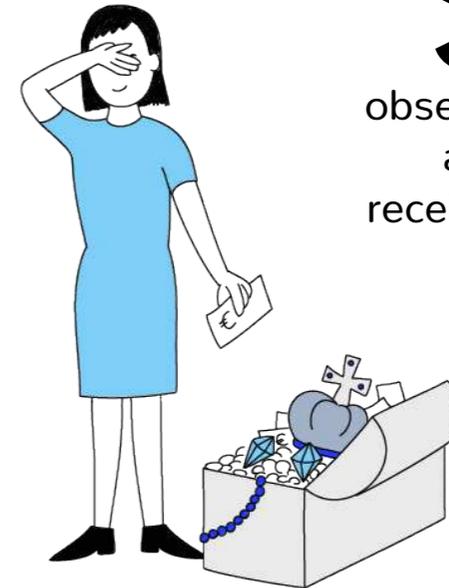
43%

observed sexual harassment.



39%

observed giving, asking for or receiving bribes.

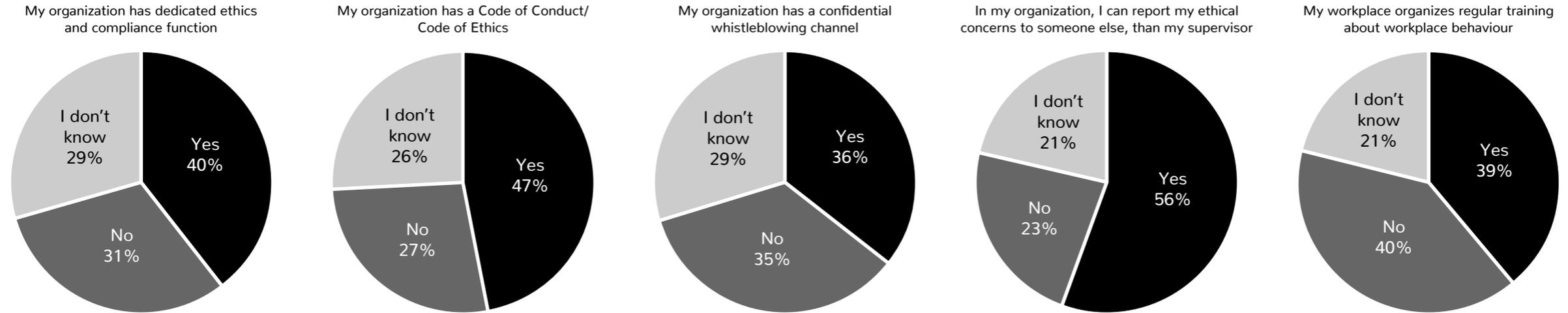


THE ETHICAL STANDARDS OF AN ORGANIZATION

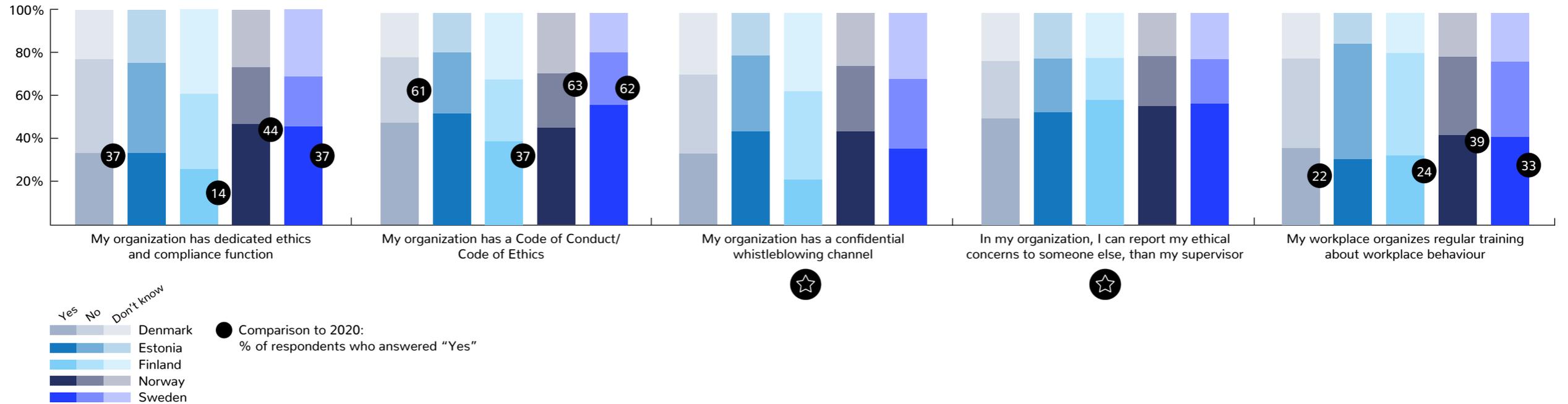
KEY TAKE AWAYS



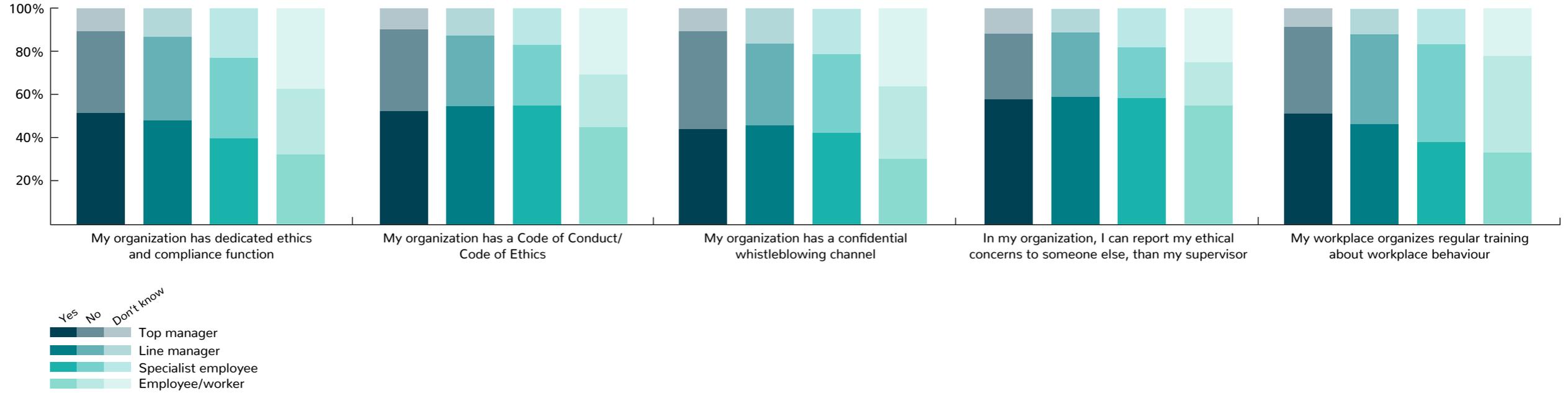
What is the organizational awareness of business ethics principles? – Nordic average (N=5000)



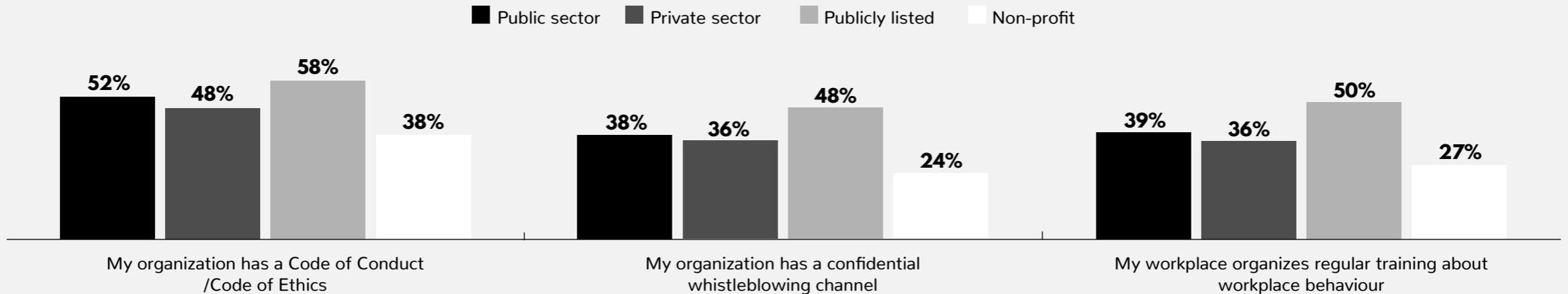
What is the organizational awareness of business ethics principles? – by country (N=1000/country)



What is the organizational awareness of business ethics principles? – by role (N=4616)

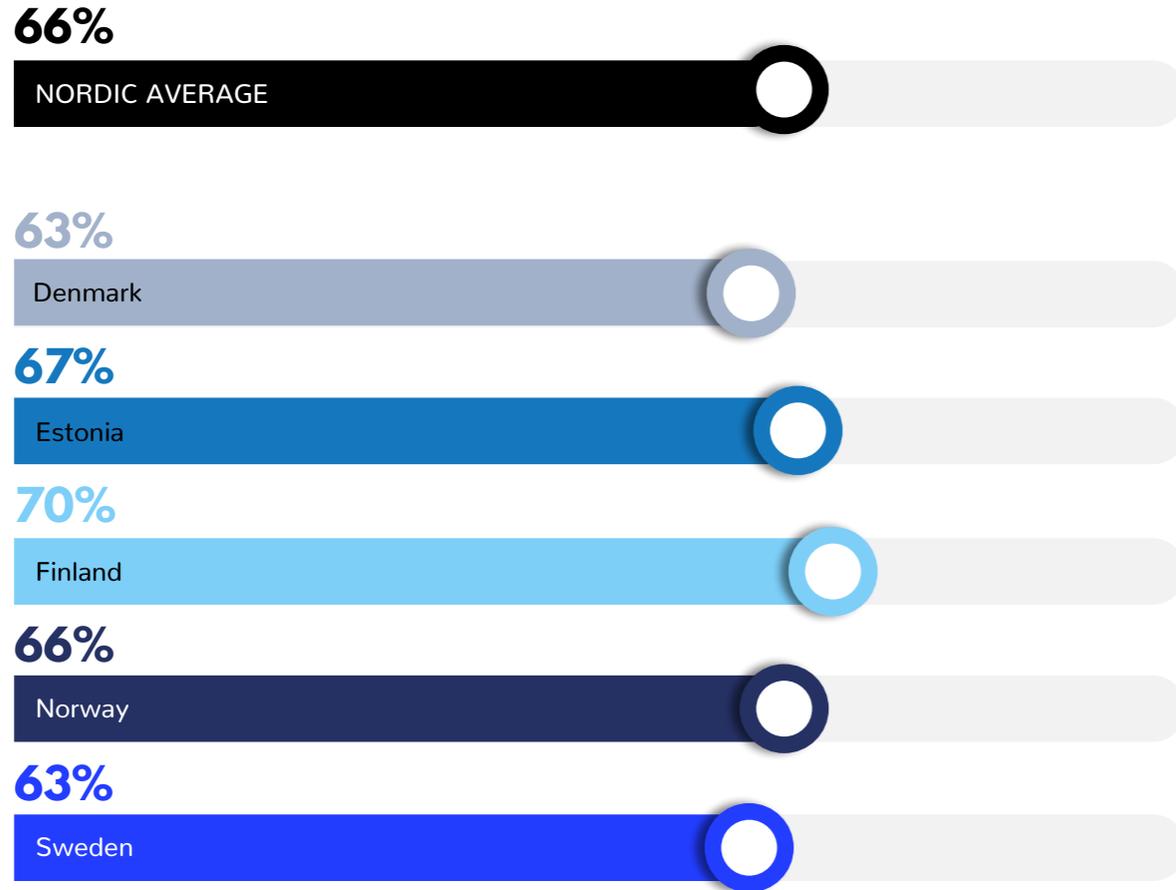


Comparison by sector (N=4691)



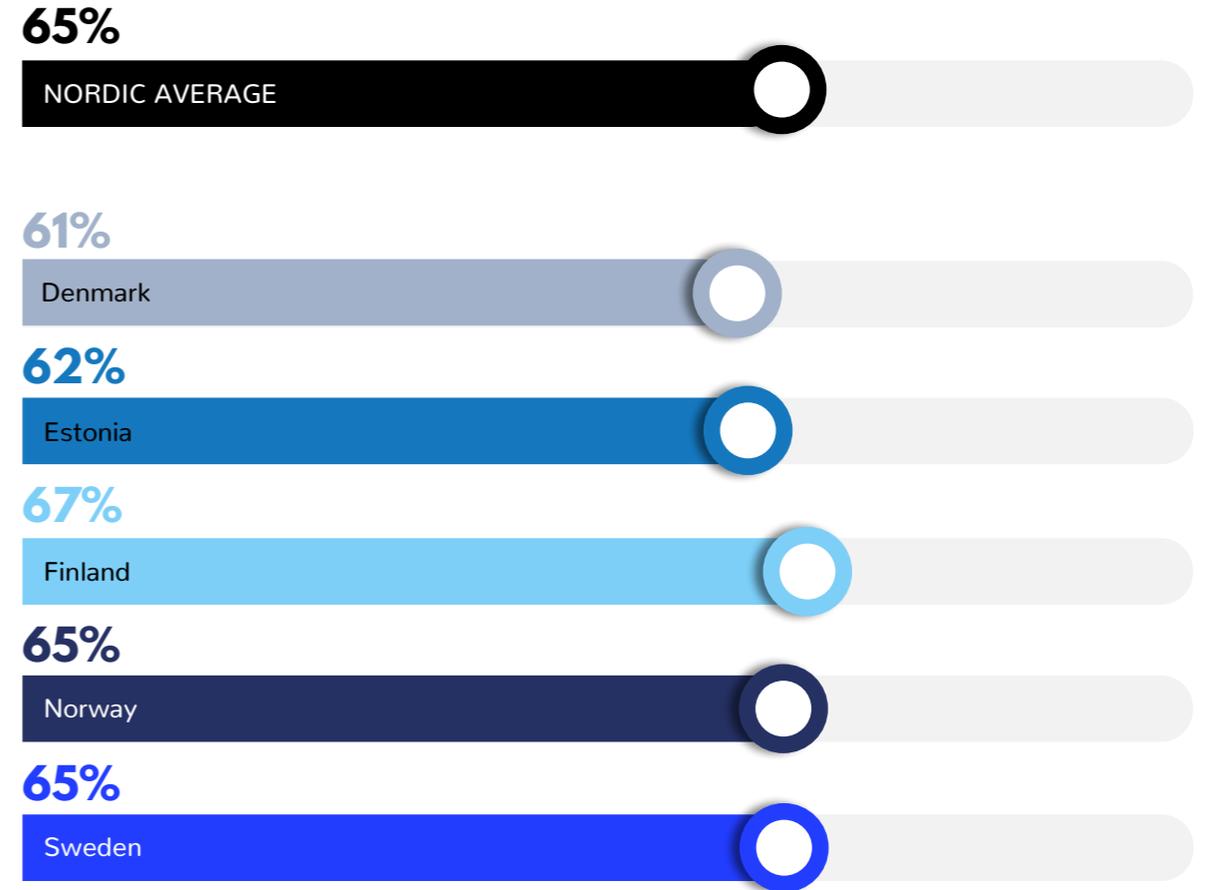
“If I suspect or witness unethical or illegal conduct in my organization I know how to act.” – by country

% of respondents (4523) who strongly agree



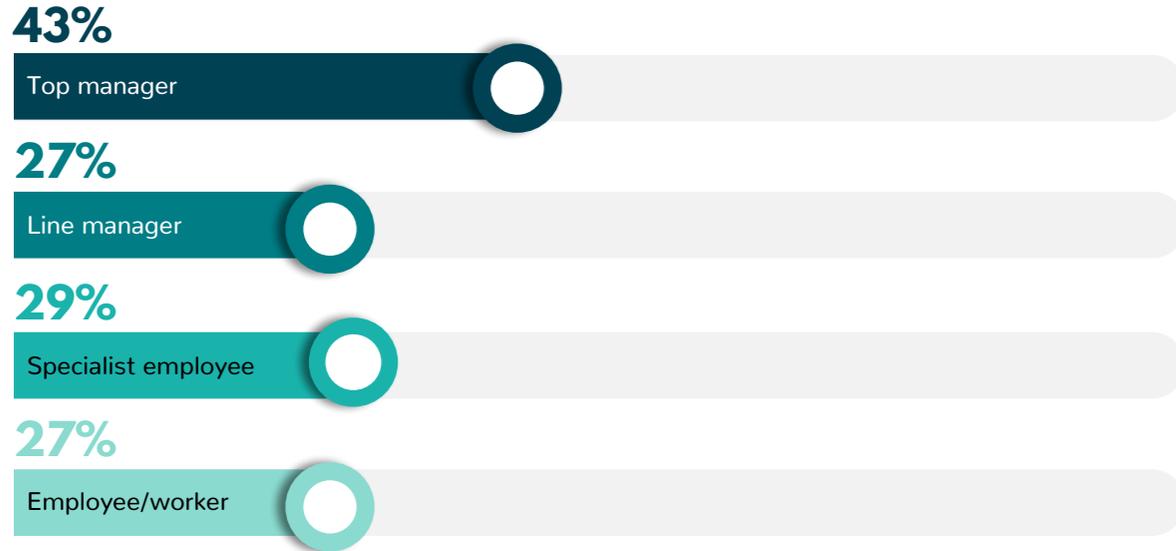
“Unethical conduct is disciplined in my organization.” – by country

% of respondents (3960) who strongly agree



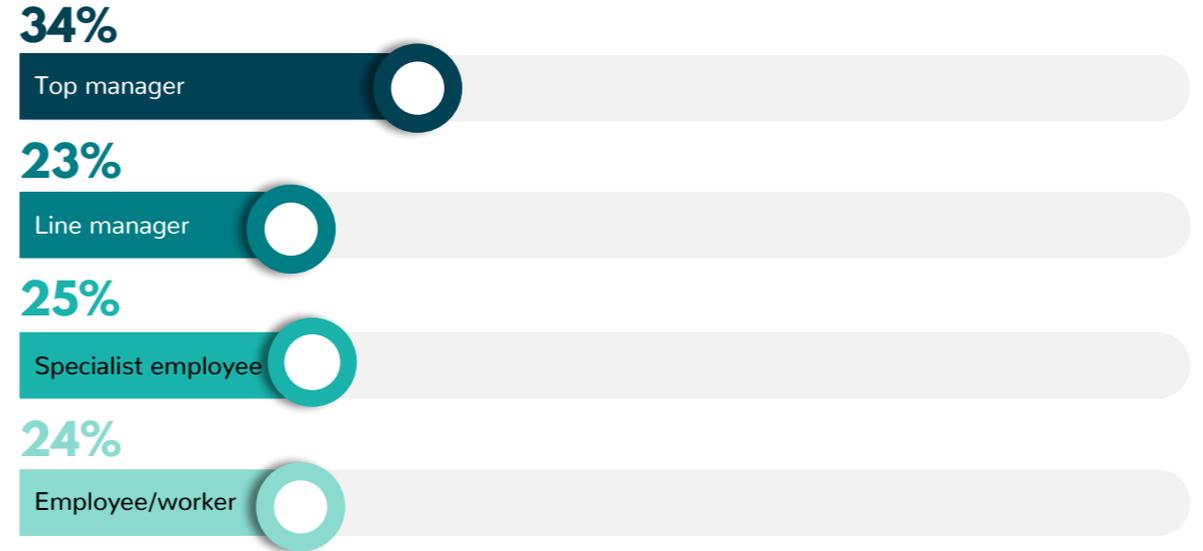
“If I suspect or witness unethical or illegal conduct in my organization I know how to act.” – by role

% of respondents (4523) who strongly agree

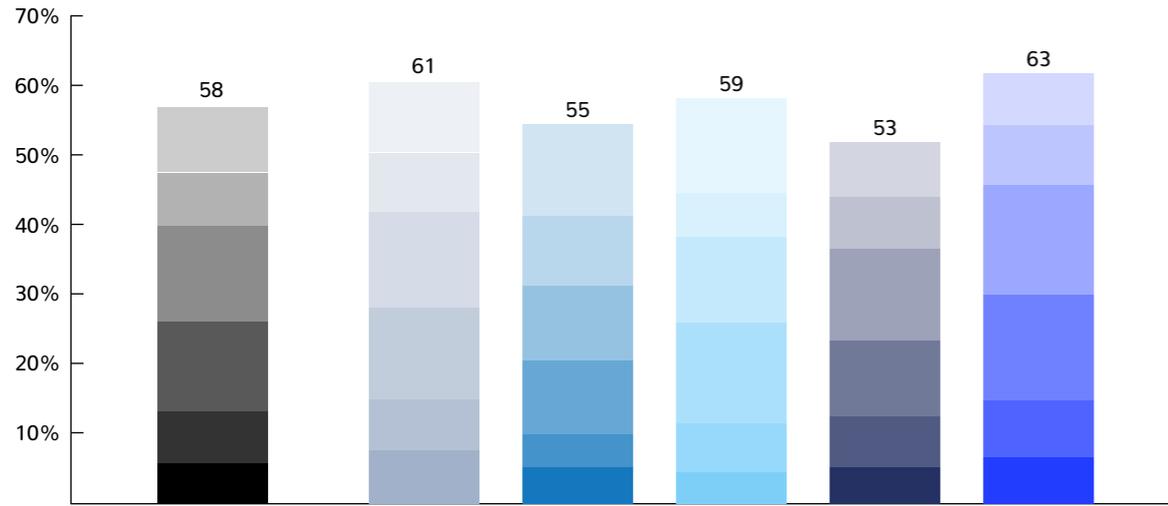


“Unethical conduct is disciplined in my organization.” – by role

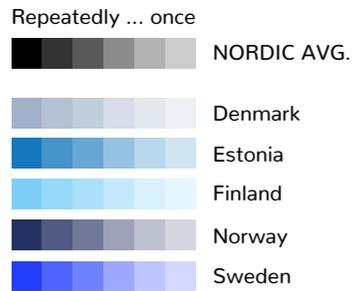
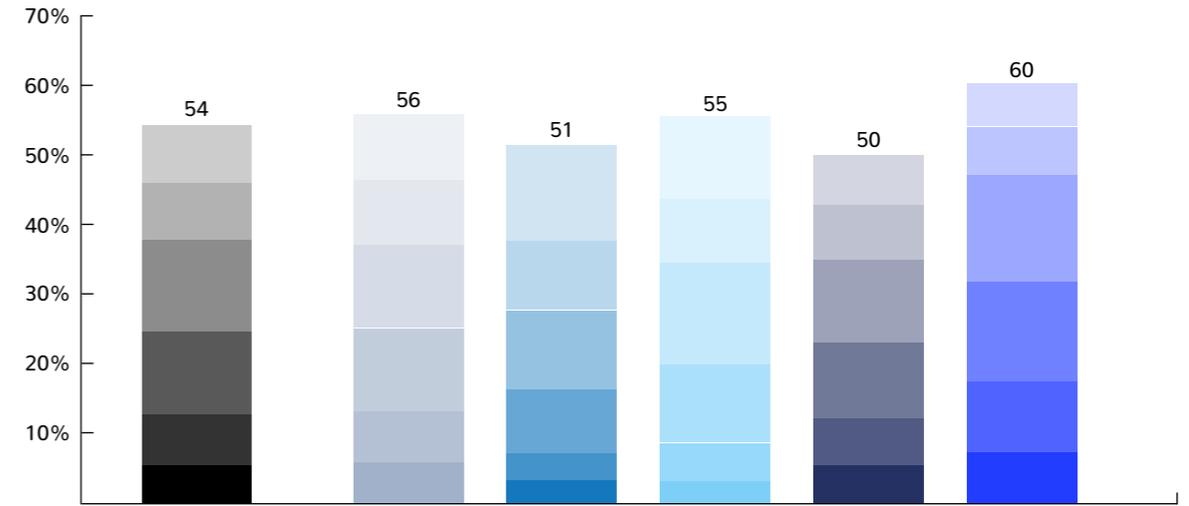
% of respondents (3716) who strongly agree



“I have had to compromise my personal ethical standards.” – by country (N=4671)



“I have had to compromise my organizations Code of Conduct or policy.” – by country (N=4542)



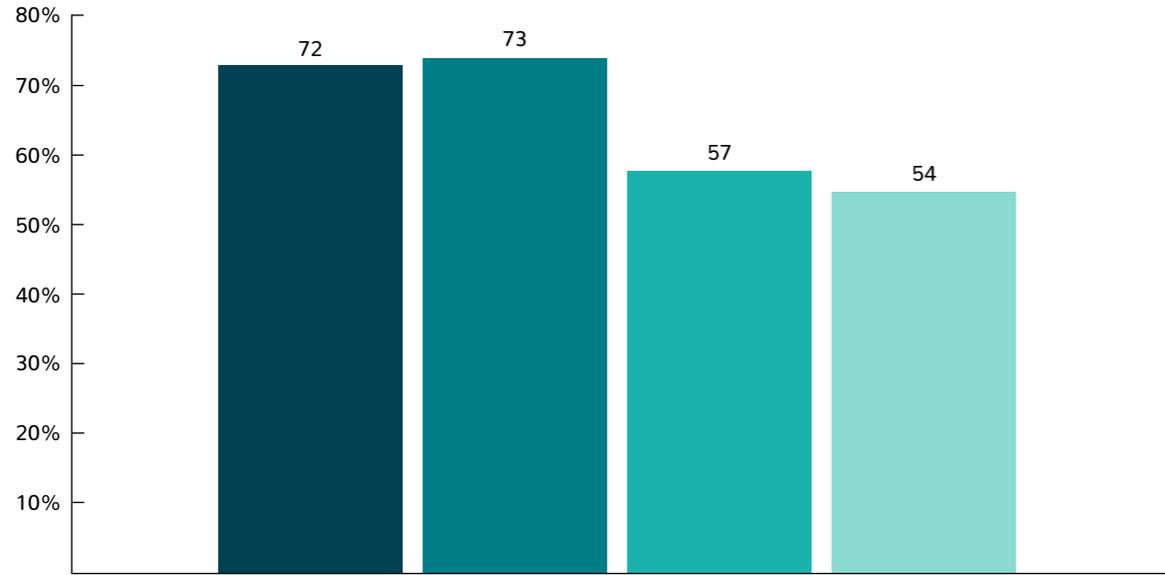
Women are less likely to make ethical compromises than men



“I have had to compromise my personal ethical standards.”

- by role

% of respondents (4348) who chose between 'once' and 'repeatedly'

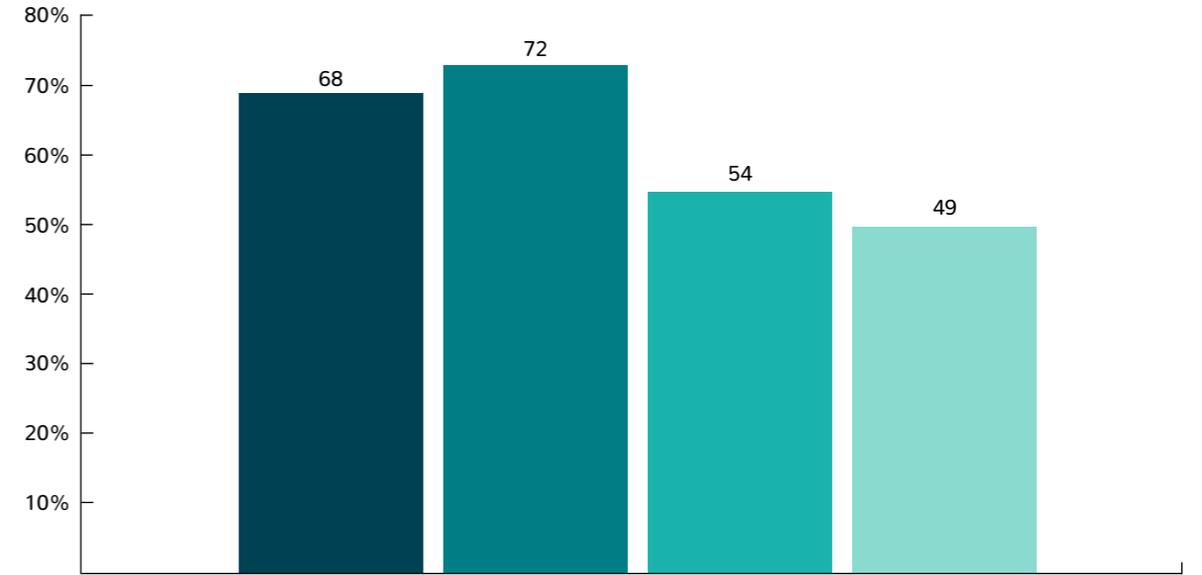


■ Top manager ■ Line manager ■ Specialist employee ■ Employee/worker

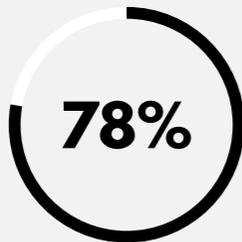
“I have had to compromise my organizations Code of Conduct or policy.”

- by role

% of respondents (4234) who chose between 'once' and 'repeatedly'



Younger generations are more likely to compromise ethical standards



18-19 YEARS



20-29 YEARS



30-39 YEARS



40-49 YEARS



50-59 YEARS



60+ YEARS

Reasons for compromising – by country

% of respondents who chose somewhat agree, agree or strongly agree

	NORDIC AVERAGE	Denmark	Estonia	Finland	Norway	Sweden
I wanted to benefit the customer.	49%	45%	31%	58%	45%	49%
The ethical way was not realistic due to time constraints.	46%	48%	33%	48%	44%	46%
The ethical way was not realistic due to budget or resource limitations.	43%	43%	30%	45%	40%	45%
To fulfill performance or sales targets.	39%	34%	24%	38%	42%	39%
I was following the instructions from my manager.	45%	41%	47%	49%	48%	41%
I felt pressured to be a team player	42%	43%	32%	43%	42%	41%
I was afraid of losing my job.	36%	37%	30%	32%	37%	38%
It was normal practice in our company or industry.	42%	40%	33%	44%	43%	43%

Reasons for compromising – by role

% of respondents who chose somewhat agree, agree or strongly agree

	Top manager	Line manager	Specialist employee	Employee/worker
I wanted to benefit the customer.	65%	51%	43%	43%
The ethical way was not realistic due to time constraints.	51%	45%	43%	43%
The ethical way was not realistic due to budget or resource limitations.	55%	44%	39%	39%
To fulfill performance or sales targets.	53%	43%	32%	32%
I was following the instructions from my manager.	57%	48%	43%	40%
I felt pressured to be a team player.	53%	46%	39%	37%
I was afraid of losing my job.	45%	40%	35%	32%

What is the Nordic Business Ethics Initiative?

We want to provide fact-based insights, thought leadership and exchange best practices in relation to building more ethical organisations.

Fact-based insights – we publish periodic surveys on e.g., how employees perceive ethics at their workplaces and how ethics and compliance work is arranged in organisations. Since 2019, we have published 4 surveys.

Thought leadership – we arrange live streamed and recorded discussions with well-known experts and professionals. Since 2020, we have arranged 8 Ethics Talk LIVE discussions and released 12 EthicsTalk podcasts.

Sharing best practices – we believe in a transparent dialogue and welcome anyone to join our network by signing up to our newsletter. By joining the network, you will receive blog posts, recordings, invitations to virtual events and information about in-person networking opportunities.

Backed by the support of our partners, we can provide you with fact-based insights, thought leadership and best-practice sharing. We welcome partnerships with organisations who share our mission to build more ethical organisations. During the year, we have collaborated with DLA Piper, Forensic Risk Alliance, Frank Partners, Hannes Snellman, Ropes & Grey, The Finnish-Swedish Chamber of Commerce and The Swedish Anti-Corruption Institute.

A special thanks to our partners who have enabled this survey:



INSTITUTET MOT MUTOR



Co-founders of NBE: [Anna Romberg](#) & [Niina Ratsula](#)



DLA Piper discusses retaliation at the Survey's Launch Event on 21 November 2022

"The results of the survey show that a high number of respondents had experienced different forms of retaliation for speaking up. Also, the concerns that speaking up could jeopardise one's job or that one would be seen as a difficult person were high in the survey results together with a view that speaking up would not make any difference.

In addition to the results being distracting as such, they should be considered in anticipation of the implementation of the EU Whistleblower Directive. Implementation of the Directive will strengthen the protection of a whistleblower even more and national laws will impose new forms of sanctions against companies for retaliation of a whistleblower.

Moreover, one aspect of the Whistleblower Directive and consequently the upcoming national laws is to offer whistleblowers a safe way to report serious wrongdoings to a competent authority, for example, if the whistleblower has justified reasons to believe the organisation in question does not act in an effective way based on the whistleblowing report or that the whistleblower may be subject to retaliation. Thus, in light of the survey, it will be increasingly important in the near future for companies to focus on creating a culture where everyone feels safe to speak up and where people know any defects and wrongdoings will be addressed appropriately by the organisations themselves."

Asianajotoimisto DLA Piper Finland Oy is part of DLA Piper, a global law firm with lawyers located in more than 40 countries throughout the Americas, Europe, the Middle East, Africa and Asia Pacific, positioning us to help companies with their legal needs anywhere in the world. DLA Piper is also a leading law firm in the Nordics with five offices and 470 lawyers. We help our clients make business better, more profitable and more responsible, worldwide.

dlapiper.com



FRA is proud to have sponsored the Nordic Business Ethics Survey since its inception. The survey fills an important gap between perception and reality in how Nordic employees see ethics and culture in their workplace.



FRA Director in Stockholm and London, Viktor Josefsson, discusses observing unethical behaviour:

Today's economic climate presents a perfect storm for fraud: opportunity, rationalisation and pressure.

It is startling that 53% of respondents have observed unlawful activities during the past 12 months, compared with only 8% in 2020. This could be due partly to an improved ability to identify such activities, but may also be due to the aftermath of Covid-19 when economic conditions increased pressure on organisations and their employees to fulfil customer expectations and achieve or exceed targets.

The survey reveals a concerning lack of emphasis on continuous training and proactiveness, which affects ethical culture and compliance.

Culture is the foundation of an organisation's ethics and compliance program. Continuous training and proactive awareness-building bring that culture and program to life. With the right attitudes in place, teams can turn their attention together to best practices for a robust and effective compliance program, such as annual risk assessments that are core to an evolving compliance program.

Employees need to feel that they can raise concerns with confidence and that they will be taken seriously as well as investigated, when necessary.

This underpins the overall compliance program and will allow organisations to identify root cause problems, remediate and prevent future similar misconduct.

FRA is an international consultancy that combines deep forensic accounting, regulatory and investigative experience with cutting edge data mining technology to position global businesses for success as they navigate investigations, disputes, and compliance challenges.

forensicrisk.com

www.nordicbusinessethics.com
hello@nordicbusinessethics.com

 Nordic Business Ethics Network

 @NordicBizEthics

 @nordicbizethics

Text: Anna Romberg & Niina Ratsula / Nordic Business Ethics Initiative
Layout: Päivi Wargh / Wargh Creative
Illustrations: Heini Jokinen

