



Welcome to the 2009 Government Contractor Ethics Program Ranking, conducted by the Ethisphere Institute in partnership with Ethisphere Magazine. In order to participate in this survey, you must be an authorized representative of an organization that generates at least \$5 million in annual business with the United States Government.

This questionnaire consists of a mix of multiple-choice (both single and multiple-select) and open ended text questions.

Your participation is voluntary. You may skip any question if you so desire, but please remember that our analysis depends on the information you provide. The quality of that information including accuracy and breadth will directly impact your organization's overall ranking.

NOTE: All information in this questionnaire will be confidential. None of your responses will be made public or provided to another organization without your consent.

For your convenience, we have provided you with a hard-copy version of the questionnaire. In terms of completing the survey, you fill it out online by clicking the URL that was provided to you in the invitation email.

If you have any questions or experience technical difficulty or would like to submit the completed questionnaire, via email, please contact Christopher Sindik at csindik@ethisphere.org.

Thank you for contributing your time to this valuable project.

Part 1. Respondent Demographics

1. Please provide your name, business title and contact information

Your name _____
 Business title _____
 Email address _____
 Phone number _____

2. Please provide your organization's full name

3. Will you be answering these questions on behalf of the entire organization or only one division? (Select one)

- Entire
 Division only (please enter name of division-5 words _____)

IMPORTANT NOTE: If you selected "Division Only" above, when responding to the remainder of this questionnaire, please assume that all references to "organization" equates to the "division" for which you are responding.

4. Please indicate the type of your organization (Select one)

- Public company
 Private company
 Educational or research institution
 Other (please specify- 5 words)

5. Please select your primary industry (please select only **one** that most closely describes your primary activities)

- Aerospace and defense
 Agriculture, forestry, fishing and hunting
 Banking
 Business services
 Chemicals
 Computer software
 Computer hardware
 Computer services
 Construction
 Consumer products manufacturing
 Consumer
 Education
 Electronics
 Energy, oil and gas
 Environmental services, equipment and remediation
 Financial services
 Food and beverage products manufacturing
 Food service
 Healthcare products
 Healthcare services
 Industrial manufacturing
 Insurance
 Leisure and hospitality
 Media

- Metals and mining
- Non-profit
- Pharmaceuticals and biotechnology
- Professional, scientific and technical services
- Real estate
- Retail
- Security products and services
- Telecommunication equipment
- Telecommunication services
- Transportation and logistics
- Utilities
- Wholesale trade
- Other (please specify- 5 words)_____

6. Please indicate the total size of your organization's workforce (Select one)

- Less than 50 employees
- 50-249 employees
- 250-499 employees
- 500-999 employees
- 1,000-9,999 employees
- 10,000-24,999 employees
- 25,000-49,999 employees
- 50,000-99,000 employees
- 100,000-149,999 employees
- Over 150,000 employees

7. Please indicate the size of your annual business with the U.S. government (Select one)

- \$5-20 million
- \$20-50 million
- \$50-100 million
- \$100-200 million
- \$200-500 million
- \$500 million- \$1 billion
- \$1-2 billion
- \$2-5 billion
- \$5-10 billion
- over \$10 billion

Part 2 Code of Ethics and Business Conduct

8. Does your organization maintain an organization-wide written Code of Ethics and Business Conduct?

- YES
 NO

Skip logic: If NO, skip the next question

9. Is it available on your organization's internet and/or intranet site? (Select one)

- YES, both Internet and Intranet sites
 YES, but on the Internet site only
 YES, but on the Intranet site only (please email a copy to csindik@ethisphere.org and indicate "[your company name] code" in the subject line)
 NO (please email a copy to csindik@ethisphere.org and indicate "[your company name] code" in the subject line)

Part 3 Leadership and tone from the top

10. Does your organization have a formal compliance and ethics program?

- YES
 NO

11. Please specify the job title(s) of the person given primary responsibility for the compliance and ethics program/initiatives.

(open ended -10 words)

12. To whom does the person with responsibility for the compliance and ethics program/initiatives report? (Please indicate **primary** reporting relationship)

- President/CEO
 General Counsel
 CFO
 Head of Internal Audit
 Board of Directors of a Committee
 Other (please specify) _____ (10 words)

13. How often does the person with responsibility for the compliance and ethics program communicate with the Board of Directors of other Committee?

- QUARTERLY
 ANNUALLY
 OTHER (Please specify- 10 words) _____

14. Please indicate your level of agreement with the following statement:

"The person with responsibility for the compliance program has been given adequate authority and resources to perform the job effectively"

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Not sure

15. Please indicate your level of agreement with the following statement:

"The Board of Directors is actively engaged in your organization's ethics and compliance program"

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Not sure

16. Please indicate your level of agreement with the following statement:

"The organization's senior executives regularly and consistently communicate with the employees regarding the proper standards of conduct, ethics and compliance"

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Not sure

17. Please indicate your level of agreement with the following statement:

"Communications from the executive level emphasize the importance of using the U.S. government resources efficiently"

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Not sure

18. Please indicate your level of agreement with the following statement:

"Communications from the executive level emphasize the importance of using internal whistle-blowing system for reporting misconduct or concerns without fear of retaliation"

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Not sure

Part 4 Internal control systems

19. Does your organization maintain policies that address the following issues?
(Select all that apply)

- Antitrust/competition
- Conflicts of Interest
- Gifts, entertainment and kickbacks
- Working with or hiring former government officials
- Political contributions, activities and lobbying
- Ensuring integrity of agents, consultants and representatives
- Bribery and corruption (FCPA)
- Truth in negotiations
- False claims
- Proper cost accounting (including labor charging)
- Cooperating with the government investigations
- Confidential information including procurement sensitive information and confidential competitor information
- Data privacy (employees, customers and/or consumers)
- Record retention
- Export controls and national security
- Insider trading
- EEO, discrimination and harassment
- Environmental protection
- Workplace health and safety

Please specify any other key policies relevant to your business that are not listed above (50 words)

Open ended text

20. Does your organization require periodic conflict of interest certifications/disclosure from certain employees?

- YES
- NO

Skip logic: if NO, skip the next question.

21. The following employee segments are subject to conflict of interest certification/disclosure in the past 24 months (please select all that apply)

- Executive level
- Vice Presidents
- Directors
- Managers
- All or most employees in sales function

- All or most employees in procurement function
 All or most employees in finance function
 Other (PLEASE SPECIFY _____ 200 words)

22. Does your organization routinely perform background checks prior to hiring key personnel?

- YES
 NO

23. Does your organization routinely conduct exit interviews as people leave?

- YES
 NO

Skip logic: of NO skip the next question

24. Exit interviews used for the following purposes (select all that apply)

- To obtain information about possible misconduct or policy violations that may have taken place
 To obtain information concerning organizational health and the culture of ethics
 To remind employee about his or her responsibilities regarding confidentiality
 Other (PLEASE SPECIFY _____ 20 words)

25. What mechanisms does your organization use to ensure vendor compliance? (select all that apply)

- Our organization maintains a written vendor code of conduct
 Vendor acknowledgement and compliance with the vendor code is a required condition of doing business with the organization
 Our organization's hotline and other reporting mechanisms are available to use for vendor personnel
 Our organization encourages or requires vendors to maintain an anonymous reporting hotline
 Our organization conducts due diligence when selecting vendors
 Our organization conducts periodic vendor audits to ensure compliance
 Vendors are encouraged or required to obtain a third-party certification for ethics and compliance
 Our organization provides vendors with compliance and ethics training assistance or resources

26. How would you rate the level of oversight of your vendors and subcontractors?

- High
 Above average
 Average (neither high nor low)
 Below average
 Low

27. Does your organization display government fraud hotline poster at its workplace locations?

- YES
 NO
 SOME, BUT NOT ALL

28. Does your organization have an FCPA compliance program?

- YES
 NO
 NOT APPLICABLE (We do not conduct business outside of the United States)

29. Does your organization conduct due diligence for third-party representatives (e.g. agents, distributors, joint venture partners)?

- YES
 NO
 SOME, BUT NOT ALL (please specify: 50 words)

30. Does your organization maintain a misconduct reporting system (whistle-blower system)?

- YES
 NO

If NO, skip the next 3 questions

31. The reporting mechanism permits the following (Select all that apply):

- Report potential or actual criminal misconduct
 Report potential or actual violations of organizational policy(s)
 Seek guidance regarding ethics and compliance issues
 Express concerns
 Other (PLEASE SPECIFY _____-50 words)

32. Please specify the type of reporting options available (Select all that apply):

- Phone number
 Website
 Email
 "Open door"
 Other (PLEASE SPECIFY _____)

33. Does any of the reporting options allow for anonymity?

- YES
 NO

34. How does your organization handle reports of alleged misconduct?

- Conduct internal investigations of all reports of alleged misconduct
 Conduct internal investigations of those reports that seem credible
 OTHER (please specify- 50 words)

35. Does your organization maintain a clear process for escalating certain types of allegations to senior management, the Board of Directors (or a Committee) or external auditors?

- YES
 NO

36. What kind of misconduct information is reported to the Board of a Committee? (select all that apply)

- Overall misconduct reporting statistics in periodic (e.g. quarterly) reports
- Details of all key investigations after they have been completed
- Details of all key investigations in progress
- OTHER (please specify- 50 words)

37. Please indicate your level of agreement with the following statement:

"Our organization maintains a well-defined criteria and process for evaluating the internal reports to determine whether formal government disclosure is appropriate and warranted"

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Not sure

38. Does your organization maintain a non-retaliation policy for a good-faith misconduct reporting?

- YES
- NO

Skip logic: If NO, skip the next question:

39. Please indicate your level of agreement with the following statement:

"Our organization's non-retaliation policy has been clearly communicated to all employees"

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Not sure

40. Does your organization maintain a written policy and procedures on disciplinary actions?

- YES
- NO

Skip logic: if NO, skip the next question:

41. Please indicate your level of agreement with the following statement:

"The policy and procedures on disciplinary action (for engaging in misconduct) is consistently applied/enforced throughout the organization"

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Not sure

42. In your organization, is punitive action an option against both the individual who committed the serious misconduct as well as the individual's supervisor?

- YES
- NO

43. Does your organization offer any of the following incentives for employees for engaging in ethical conduct? (please select all that apply)

- Evaluation of ethical business conduct as a part of annual performance reviews
- Evaluation of ethical business conduct as a part of promotion decisions
- Awards and recognitions showcasing ethical business conduct
- Other (please specify- 50 words)

44. Within the past 24 months, has your organization conducted a risk assessment to determine compliance, regulatory and ethics related risks?

- YES
- NO

45. Within the past 24 months, has your organization conducted a formal evaluation or benchmarking of your overall compliance and ethics program/initiative to evaluate its relative effectiveness?

- YES
- NO

Skip logic: If NO, skip the next question

46. Which components of the compliance and ethics program have you evaluated within the past 24 months? (select all that apply)

- Code of Ethics and Business Conduct
- Policies, procedures and controls
- Training and communication
- Organizational health and culture of ethics
- Employee knowledge of compliance and ethics issues relevant to their jobs
- Whistle-blowing system
- Auditing system
- High level oversight
- Other (please specify- 50 words)

47. How would you describe your organization's culture of ethics?

- Very strong
 Strong
 Fair
 Weak
 Very weak

Part 5. Training and communication

48. Does your organization maintain a training plan for ethics and compliance training?

- YES
 NO

49. How would you rate the average level of awareness of Code of Ethics and Business Conduct among employees in your organization?

- High
 Better than average
 Average (neither high nor low)
 Below average
 Low

50. Does your organization offer a dedicated training program on the organization's Code of Ethics and Business Conduct for employees?

- YES
 NO

Skip logic: if NO, skip next 6 questions

51. Please describe briefly the current audience and frequency for Code of Ethics and Business Conduct training as well as an approximate percentage of your total workforce that receive this training.

(open ended: 500 words)

52. Is the Code of Ethics and Business Conduct training mandatory?

- YES, for all employees
 YES, for some, but not all employees (please specify the mandatory groups of employees)
 NO

53. Does your organization track completion of the Code of Ethics and Business Conduct training?

- YES
 NO
 DEPENDS ON THE AUDIENCE

54. Please indicate your level of agreement with the following statement:

"Code of Ethics and Business Conduct training in our organization strongly emphasizes the importance of reporting issues or concerns"

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Not sure

55. Please indicate your level of agreement with the following statement:

"Code of Ethics and Business Conduct training in our organization properly emphasizes the importance of cooperating with the government investigations"

- Strongly agree
- Agree
- Neutral/not sure
- Disagree
- Strongly disagree
- Not sure

56. Does the Code of Ethics and Business Conduct training in your organization provide learners with a clear guidance on any of the following reporting options?

- Internal reporting options only
- External reporting options only
- Both external and internal options with an equal emphasis
- Both external and internal options with an emphasis on internal options

57. Has the Board of Directors been trained on the Code of Ethics and Business Conduct?

- YES
- NO

58. Beyond the Code of Ethics and Business Conduct training, does your organization offer targeted compliance training on any of the following topics to specific groups of employees? (Select all that apply)

- Antitrust/competition
- Conflicts of Interest
- Gifts, entertainment and kickbacks
- Working with or hiring former government officials
- Political contributions, activities and lobbying
- Ensuring integrity of agents, consultants and representatives
- Bribery and corruption (FCPA)
- Truth in negotiations
- False claims
- Proper cost accounting (including labor charging)

- Cooperating with the government investigations
- Confidential information including procurement sensitive information and confidential information of competitors
- Data privacy (employees, customers and/or consumers)
- Record retention
- Export controls and national security
- Insider trading
- EEO, discrimination and harassment
- Environmental protection
- Workplace health and safety

59. Does your organization routinely offer ethics and compliance training for third-party representatives, such as agents, and business partners?

- YES
- NO

60. Does your organization routinely communicate with the employees on ethics and compliance training topics outside formal training program?

- YES
- NO

If NO, skip the next question

61. Please briefly describe your organization's ethics and compliance communication initiatives outside formal training program.

(open ended: 500 words)

62. The proposed FAR rule requires contractors to "***have a satisfactory record of integrity and business ethics***". Based on publicly available information, how would you rate your organization's overall record of integrity and business ethics in the past 5 years?

- Superior (better than most peers)
- Average
- Inferior (worse than most peers)
- Not sure/Decline to answer

63. Is there any additional information about your compliance and ethics program initiatives that you wish to share?

(open ended: 1000 words)

Thank you for completing the survey.

We also encourage you to provide us with additional documents to support your responses and our analysis. Examples of such documents include:

- ***Code of Ethics and Business Conduct***
- ***Examples of employee ethics and compliance communication materials***
- ***Employee handbook***
- ***Vendor Code of Conduct***
- ***Summary of current compliance training curriculum***
- ***Copies of key policies***
- ***Summary results of Employee Surveys (Culture surveys)***
- ***Compliance reports to the Board of Directors or other Committee***

You can email these materials to Christopher Sindik at csindik@ethisphere.org or mail them to:

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