DMH Stallard

Ethics and Compliance

How Manufacturers are Embracing the Challenge and Reducing their Risk

A Report by DMH Stallard LLP

November 2011

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Introduction from Tim Aspinall Managing Partner, DMH Stallard

In May 2011 DMH Stallard published its first report into the challenges faced by manufacturers, *Plan Protect and Prosper*. The report gained wide acclaim from both the media and the industry for delivering clear principles for manufacturers to help them leverage intellectual property to create value and safeguard their futures.

Since then, DMH Stallard's work with many leading manufacturers has continued. We are committed to investing in the sector by commissioning leading research and thought-leadership initiatives that will help the sector rise to the difficult challenges ahead. We believe we have a lot to offer in this field and want to ensure manufacturing remains as a major contributor to the national economy.

Our second report follows and is the conclusion of six months detailed research into the impact that ethics and compliance has on the ability of manufacturers to remain competitive.

I would like to take this opportunity to thank all the companies that we interviewed for their time and commitment to sharing their ideas and practices with us. They have provided an invaluable insight into the many intricacies and inevitable hurdles that must be overcome to ensure organisations are both compliant and competitive.

Tim Aspinall
Managing Partner, DMH Stallard

About Tim Aspinall: Tim is Managing Partner of DMH Stallard LLP and is recognised as one of the country's leading lawyers. Tim works closely with many of the firm's larger clients and is responsible for developing long standing strategic relationships that help benefit both the client and DMH Stallard. E. tim.aspinall@dmhstallard.com

Executive Summary

As we approached the implementation of the new Bribery Act, the focus of many businesses and their legal advisors was to implement policies and procedures to protect themselves.

However the ethical conundrums businesses face are far broader than this. We only have to look back over the past year to see the serious damage caused to businesses by alleged unethical practices going on within their organisations.

The recent events at News International have shown senior executives lose their positions and massive financial bids fail, amidst allegations of bad practice and a culture that seemingly ignored or even encouraged unethical business.

BP was shaken last year as a seemingly unstoppable environmental disaster threatened to destroy a company that is truly an institution. The allegations of cost cutting on environmental and safety procedures and inadequate management of sub-contractors severely damaged BP's brand and financial position.

Additionally we now find the political parties entering into a debate concerning "good and bad" business and how ethical business practices can be encouraged or even achieved by some sort of regulation.

The ethical challenges we face are expanding. As a nation we are currently attempting to "rebalance our economy" by investing in our manufacturing and engineering sector. As part of this we are encouraging our businesses to export more. This trade will not just be with our existing customers in the USA and Western Europe. We need to increase trade with the BRIC (Brazil, Russia India and China) countries and as a consequence with the emerging CIVETS countries too (Columbia, Indonesia, Vietnam, Egypt, Turkey and South Africa).

The proportion of the UK's total exports to the BRIC nations is at a paltry 5% and our total trade to India and China combined is still less than our trade with the Republic of Ireland.

Although our exports to the BRIC nations is rising at 18% pa, UK businesses face the challenge of trading in nations that have a business culture which is far removed from the conventional way of doing business that we are used to. Additionally we are competing against other countries, particularly USA, Germany, France and Japan that are certainly some way ahead of us in dealing with the issue.

In order to find out how manufacturers were coping with this challenge we interviewed eleven businesses. All of the interviews were confidential to enable us to explore the issue thoroughly and in an atmosphere of trust.

We were keen to find out if ethics and compliance was an issue driven by big companies only or did smaller businesses take the issue seriously as well, either independently or because of supply chain pressure. The companies we interviewed therefore varied in size and speciality and sector, from large multinationals through medium size businesses to SMEs, including family owned businesses.

Several had US parents. The sectors they covered included defence, aerospace, transportation, healthcare, oil & gas, FMCG, energy, retail and automotive. All of the interviews were conducted from June to September 2011.

As we looked at it more closely it became increasingly clear that the issue is not just about bribery – it's about how companies define their business values, communicate them and uphold them. It is also about protecting the reputation and brand of the company. It's about how companies, particularly manufacturing and engineering businesses, meet the challenges of foreign trade.

In this report we summarise the responses we received and draw some conclusions. We hope that all businesses will find it both interesting and helpful in addressing this key area.

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Here is our 10-step Guide to Embracing Business Compliance and Ethics

1. Have a clear policy statement. A credible statement must be endorsed and practised by the leadership of the organisation stating the values of your company and promoting ethical business. Investigate the use on Non-executive Directors to measure compliance at Board level and have compliance as a standing item on the agenda.

2. Have clear procedures in place. This will endorse your policy statement and will help employees understand what is expected of them particularly regarding facilitation payments. Build procedures, (including a whistle blowing policy) into the company Quality or Business Management Systems. Keep these processes distinct from the company Grievance procedure.

3. Provide independent advice and guidance. Appoint a senior Executive within the organisation, preferably 24/7, mandating that employees seek advice and ask permission before making any payments that may be construed as facilitation payments, or worse, bribes. Keep an audit trail of conversations by note and/or by email and make sure that any demands for payment are recorded and if necessary, reported to the appropriate authorities in the country concerned.

4. Provide training. Ensure that your policy and procedures are communicated effectively to your staff. Audit whether they have been trained appropriately and provide regular audited refresher sessions at least once a year.

5. Adopt group wide responsibility. Ensure that you provide staff with the right level of support and adopt an open and consultative approach. If staff feel that they are threatened in difficult situations, make them aware that the company will protect them. Remember that as an employer you have a duty of care.

6. Review overseas agents. Implement a regular review of overseas agents and move them away from commission based contracts. Check the credentials of those you are working with overseas if you suspect that they may be agents taking commission. Consider building relationships with partner companies rather than individuals.

7. Review corporate hospitality. Conduct a review of the provision and acceptance of hospitality in the business. Create a hospitality log or register to highlight the giving and accepting of "lavish" hospitality or a high frequency of acceptance to or from certain parties.

8. Develop know-how. Keep up to date with customer initiatives in this area. Work with your customers and under the umbrella of large organisation if possible. Look out for advice from UKTI, The Serious Fraud Office and your legal advisor.

9. Widen your horizons. Do not confine the issue to bribery and corruption, review the whole area of Corporate Social Responsibility and use it to demonstrate and uphold your company's values. Encourage employees to create, get involved with and support initiatives.

10. Add value to your business. Think of ways that your ethical approach to business differentiates you from the competition and use this for competitive advantage. Where financially possible explore where you can exceed statutory requirements.

Managing Risk

Not surprisingly the large multinational businesses took the issue of managing risk very seriously indeed. All of the large companies we interviewed worked in a highly proceduralised environment with tightly set standards of behaviour that were fully embedded in the business management systems of the companies concerned.

The companies all stated to their staff and the world at large what their values were and how they would uphold them. This was reinforced by a "code of conduct" clearly stating what behaviours were expected of their employees.

In turn these statements were supported by the senior management and Board of Directors. Training was given to all staff and there were regular updates and reviews of this. Often the reviews were online. In one company this could be fortnightly for some senior executives. It was recorded whether employees had taken the test.

Implementation and enforcement was not always straightforward. One large company stated that "when the programme was brought in there were at first casualties in management followed by some on the shop floor as inappropriate behaviours and attitudes were rooted out. "

The evidence was that the corporation came down hard on offenders and seemed to be fairly unforgiving. Their view was that, in the long term, better trust created a better working environment.

Two companies that were US owned told us that there had been slight adjustments for the UK operation, particularly in how things were communicated, to take into account the UK culture and even our sense of humour. Another US owned business had one standard worldwide.

The large businesses all had strong whistle blowing procedures backed up with 24/7 help lines to either deal with whistle blowing issues alone or to support staff generally by advising on compliance. A cautionary tale came from one company which found a communication problem with the whistle blowing procedure when some staff used it to air general grievances, including one about the staff restaurant which went straight to the USA.

Most companies also had executives at Director level to manage the compliance agenda and advise or train executives. Some have NEDs specifically responsible for monitoring compliance. Most of the large companies we interviewed had "flowed down" ethical business requirements to their tier one suppliers by making it a condition of their contracting arrangements. Whether this was continually moving down the supply chain was less clear as the audit trail became more difficult.

Not surprisingly we found amongst the smaller companies a fair degree of variation in how they dealt with the compliance issue.

Some companies tried to emulate the larger businesses with statements of values in their company documentation. One company had an "Honour Code" expressing how it expected its employees to behave. This was signed by all employees on commencement of their employment.

Some had nominated a senior Director to be the prime contact for advice on compliance issues and written this into procedures. Others had a more informal approach where it was seen as implicit that staff would talk to senior management if they needed advice.

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Bribery, Facilitation Payments and Unethical Business Practices

"Facilitation payments are 'unofficial payments made to public officials (usually overseas) in order to secure or expedite the performance of a routine or necessary action'."

Since the Bribery Act came into force at the beginning of July 2011 it has been illegal for companies to pay facilitation payments. It has been illegal to pay a bribe since only 2002. Facilitation payments are "unofficial payments made to public officials (usually overseas) in order to secure or expedite the performance of a routine or necessary action." They are usually made to obtain something to which the organisation is already legally entitled, for example getting goods released from customs.

Under US legislation there is an exemption within the Foreign Corrupt Practices Act which allows small payments of this nature. There is no such exemption in respect of facilitation payments under the new UK act.

Only one company interviewed did not recognise facilitation payments as an issue. Of the large companies we interviewed there was a varied approach. One company stated that it was a disciplinary offence for any employee to be engaged in such activity. Another stated that facilitation payments were to be "strongly discouraged" whilst another stated that employees should seek guidance from the appointed Director responsible for compliance before making any payment.

In the smaller companies the policies were remarkably similar, with most having a very low tolerance on the issue. One company had stopped making payments in France several years ago and stated that their business performance had since improved in that country. Another company that traded in India had held firm against demands for facilitation payments from customs officials and dock workers. They repeatedly jumped over the hurdles in front of them meeting the demands for extra paperwork, making it clear that they were never going to pay. Eventually the message got through to the officials and it is rare that they now receive demands. This company has also been supporting local citizen driven campaigns in India to drive out corruption.

It also has to be recognised that SMEs are able to use a much more flexible approach when dealing with facilitation payments within their in-house procedures compared with large businesses.

Where both a large and small company drew the line was when personal safety was concerned. If an employee found themselves in a threatening situation or they perceived it was threatening then they were advised to pay and report the incident as soon as practicable afterwards. This was illustrated by the experience of one interviewee who was held back by an armed guard and prevented from boarding an aeroplane in West Africa.

He then demanded twenty dollars from the individual. In one company's eyes this would have been equivalent to "ransom" and they would have supported their employee in paying up to escape. Another large company would have held to their "zero tolerance" on the issue and may have disciplined the employee if they had been in the situation and paid.

The bribery issue did raise its head when small companies particularly discussed trading in Russia and China.

For small businesses there seemed to be considerable wariness of trading in these countries. One stated that he was "wary of corruption in China", and that was despite having a close relative working in the country. Another said that trading in Russia "scared the s**t out of him" and he would not countenance sending a member of his team anywhere where he was not prepared to go himself. It is interesting that this company does work in the former Soviet Republic of Kazakhstan, albeit under the control of a major company acting in a project management capacity. It stated that it had also received great help from UKTI in helping it trade overseas.

One company successfully exports to the BRIC countries by building relationships with partner companies indigenous to those countries. They make sure that the partner is a recognised company with some stature rather than an individual agent and is of adequate size to import, sell and distribute their products. Their view is that this is a better strategy than attempting to "export UK culture". They work with the partners to improve their business plans, provide training and even necessary investment. They view the partners as their "eyes and ears" in the country concerned. The relationship however is very "hands on" with regular visits from the UK, shared visits to customers in the country concerned and audit of activities. The company stresses to the partner that they must uphold their values with the penalty of a cessation of the relationship if transgressions are made.

One large company, when dealing with large overseas contracts, made sure senior commercial executives were accompanied by a company lawyer when dealing with potential customers, both to give appropriate advice and act as a witness on their behalf.

A contentious area, particularly concerning those in the defence sector was that of off-set. This is when foreign governments purchasing UK equipment request that (or are offered) a certain value of business is placed in their country; for example sub-contracted manufacturing work. This can also entail the supplier investing in infrastructure and educational establishments in the country concerned.

Although when seen in the cold light of day this could be considered an inducement to do business, most companies we interviewed saw it as a pre-requisite for doing this type of work. The key requirement of all off-set work is that it is open and transparent to all.

Again, an area of concern related to the supply chain. Several of the large companies were of the opinion that they did not really have ways of establishing what linkages their suppliers may have with unsavoury organisations. Similarly when Governments encouraged them to buy COTS (Commercial of the shelf) products for defence projects there may not be much choice where they came from and who supplied them.

Another area of business practice which was brought up was that of customers approaching companies to reverse engineer products and effectively "steal" intellectual property from another company. This was reported in several interviews. Understandably the companies concerned regarded this as an unethical way of doing business.

It's interesting to note that this issue was identified several times during our report on IP *Plan, Protect and Prosper*. It is clear that, with the advent of new digital technology making it relatively easy to convert objects into 3D computer models, this type of behaviour is becoming more commonplace.

One salutary tale came from a business that had a very unsatisfactory merger with a company they had been partnering with for sometime in mainland Europe. Perhaps the UK business had not completed thorough due diligence but they found themselves in a mire of hidden debts and incestuous supply chain relationships set up by the foreign business. The UK business was saved by the intervention of a non-executive Director in the foreign business who drove through the actions required to remedy the situation.

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The Use of Agents

Again the use of agents was varied across the companies we surveyed. Some companies did not use agents at all or, as mentioned earlier, had forged relationships with specific businesses rather than individuals.

One company had systematically removed overseas based agents and replaced them with employed staff. Some employed émigrés from countries they wished to trade with in their UK teams.

One Managing Director stated that he preferred to befriend and work with people in trusting partnerships where there was a clear “win-win” for working together rather than use intermediaries.

Some companies had removed the commission it paid its agents and retained them on different terms whilst others still had agents retained on commission based sales contracts.

It was apparent that all the companies we surveyed had little degree of traceability as to whether agents were “splitting” commission to share with customers. It was acknowledged that this would be a very difficult activity to police.

One company working in India discovered to its cost that it was actually dealing with an agent when it though it was working with an employee of the customer. The individual concerned was wearing apparel designed to look like the official garb of the customer but was actually a third party agent.

Hospitality

A subject that has perhaps caused most excitement since the introduction of the Bribery Act has been the issue of the giving and receiving of hospitality.

"The word most mentioned in all of our interviews was 'lavish'."

It is clear that all of the businesses we spoke to have taken this on board. Most are changing their entertainment policies to reflect the new environment.

Most businesses identified a line to be drawn between the genuine opportunity to meet business contacts to foster relations and the extravagant or unnecessary. Corporate boxes at international rugby matches are being replaced by match tickets and a pub meal. One company even handed over the use of a box to a local children's home. Another offered tickets to the practice day at the British Grand Prix to one of its customers but stated that any employee in that company would be welcomed along to take up the offer. Some had stopped offering trips on the owner's boat or rounds of golf.

Some companies operated a "hospitality register" on hospitality both offered and received. In one company they had a "trigger point" if they offered the same person hospitality, including coffee, more than six times a year. Initially this may sound petty but it was explained that this stopped anyone getting in a position where "little and often" might be seen as excessive.

It is clear that companies were also concerned at hospitality appearing lavish even if it was not. Some advised their employees not to get into situations where this could be misinterpreted or even observed by others who could misinterpret it. An example of this could be having a meal with a supplier or customer in an expensive restaurant where both parties paid their way.

Although the issue seems to have been about giving hospitality many companies had strict guidelines on acceptance. Many had cash limits (e.g. £30) on gifts. Some expected all gifts to be handed in to be subsequently used for staff raffles. One company had a member of staff who was offered tickets to a Premier League football match plus travel and overnight accommodation for them and their partner. The individual concerned informed the MD of the offer and he decided that the tickets were fine but that his own business would compensate the individual for travel and subsistence. Several companies interviewed accepted no corporate hospitality at all apart from business themed lunches or dinners. Another outlawed the consumption of alcohol in business time.

When abroad some companies experienced a problem in some countries, France was mentioned several times, where it was in the local business culture to offer expensive meals to customers. Those companies struggled to solve this conundrum and continued to comply.

Corporate Social Responsibility

As we found, a business cannot be regarded as ethical if it focuses on bribery and corruption alone. Most respondents recognised the broader obligations they owed to the communities that they operated in.

One company stated that they worked to a "triple bottom line". Namely, a positive impact on people, a positive impact on the environment and sustained profitability.

This company demonstrated this by regularly sending engineers to India to work on projects such as bridge building or creating a water supply to assist disadvantaged communities.

Another supported staff closer to home by sponsoring local football tournaments and supporting the local hospice. Several supported their employees in supporting community based projects and school outreach programmes.

One company stated that its aim was to become a "friendly" business so it went to great efforts to engage and communicate with staff. This company felt it had a responsibility to exceed legal requirements. It also took its environmental obligations very seriously with totally recyclable packaging and constant reduction of CO_2 emissions.

Another company concentrated on the through life environmental impact of its products.

The large companies all had CSR and environmental annual reports alongside their conventional annual reports. Several sponsored research on the environmental impact of their products and services. The larger businesses also focussed on diversity and actively dealt with the issue of promoting and valuing diversity in their business.

It was clear that several companies were looking to take the "high ground" on the whole CSR issue.

"One company stated that they worked to a 'triple bottom line'. Namely, a positive impact on people, a positive impact on the environment and sustained profitability."

Competitiveness

> *"An SME interviewed was of the opinion that doing business ethically may make him slightly less competitive against the unscrupulous but that anyone saying that it lost them work was probably 'making an excuse'."*

There was a mixed response when we discussed whether ethical business practices were a barrier to competitiveness.

It was clear that in countries where business practices are not as "wholesome" as they should be, unscrupulous suppliers will inevitably gain an advantage. However the companies we interviewed seemed to prefer to do business in a way that matched their values. Often they recognised the reputational and commercial benefits to be gained.

For those in the defence sector there was a clear view that the USA was driving this agenda and there was great dissatisfaction at the ITAR regulations being used to make UK based businesses uncompetitive. (International Traffic in Arms Regulations (ITAR) is a set of United States government regulations that control the export and import of defence-related articles and services).

One company believed that by not paying facilitation payments it had been unsuccessful in gaining government funding to set up a new plant in Eastern Europe.

Another interviewee cited recent goings on at FIFA and wondered who was out of step, the English FA or everyone else? His opinion was that the UK position on the moral high ground was neither understood, appreciated nor supported by most countries, including many in Europe.

One interviewee was of the opinion that the UK government had been "ridiculous" in trying to "out do" the USA legislation by making all facilitation payments illegal whatever the amount.

One large company thought that the way they expressed their ethical approach to business gave them considerable advantage. One of their commitments is that they will always deliver on time to the customer, even if they have incurred more cost than anticipated. This means that they will deliver even if they may have contractual claims against the customer. With this implicit guarantee they believe they have an advantage over the more conventional approach used by their competitors.

An SME interviewed was of the opinion that doing business ethically may make him slightly less competitive against the unscrupulous but that anyone saying that it lost them work was probably "making an excuse".

Conclusions

From all of the interviews conducted we concluded that the culture of the business is paramount. One company interviewed used the phrase that executives must have “unyielding integrity” and “live and breathe” compliance. Another Managing Director said that “A fish rots from the head” and his view was that his behaviour and that of the senior managers dictated what happened in the company.

Best practice is that the executives are responsible to the Board and the non-executives measure compliance as a standing agenda item.

The better organisations have created processes and procedures and built them into the way they do business. They also have regular training, audit trails and regularly refresh their training. These companies try to build trust in the workplace and their trading relationships to create a better working environment for their employees.

It must also be remembered that whilst the Bribery Act will no doubt focus minds within the UK. Multinational organisations are mindful that what may be construed as a UK based action or activity may inadvertently also come under the legal jurisdiction of other countries.

The common view was that any business should not do anything that it would not want to see taken out of context and “plastered in a tabloid newspaper”.

Additionally it was clear that although moral risk was important it was outweighed by legal and reputational risk and consequential damage to the brand and that this took priority.

There was a concern that the procedures in some SMEs were not as robust as they could have been and that large prime contractors had little idea how their suppliers were dealing with compliance further down the supply chain. This could possibly invalidate the good work many large companies and prime contractors have been doing.

For SMEs attempting to trade and export in the new emerging economies there was an appeal for help, not just for UK government to give more local support in those countries but for larger prime contractors to provide protection and support also.

The overriding message however, was that ethics and compliance should be considered a fundamental part of any businesses operations and that the challenges and hurdles must be addressed head-on. Businesses can no-longer afford to brush aside such issues in an age where accountability for actions can often make or break an organisation.

It seems that the smart businesses are beginning to see that fully addressing the compliance and ethical business issue can, in the end, lead to a position of competitive advantage.

Acknowledgements

DMH Stallard's detailed research was conducted under the strictest confidence of those involved. We would like express our sincere thanks to those senior executives who gave their time so generously to contribute to this study.

In addition we would like to thank Turbocam International, (who specifically requested acknowledgement) for sharing principles of their "Employee Honour Code" and their experiences of working extensively in India.

TURBOCAM International is a global turbomachinery development and manufacturing company that specialises in 5-axis machining of flowpath components. www.turbocam.com

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David Seall is a leading authority on the UK manufacturing sector and is DMH Stallard's Strategic Advisor, Manufacturing. He was previously Chief Executive of the Engineering Employers Federation for London and the South East (EEF South) for over 10 years, working with hundreds of companies. Prior to this he enjoyed a successful career in the Aerospace and Defence industry.

David is an expert in strategic management and business planning and is an exponent of Lean Manufacturing and Lean Enterprise. He is an adviser to national, regional and local government on manufacturing, business support, skills development, science and technology and innovation. He is a Chartered Engineer and Fellow of the Royal Aeronautical Society.

This report is the second of a number being led by David on behalf of DMH Stallard of particular relevance to the manufacturing sector.

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Simon specialises in all aspects of employment law and is well known for his ability to deliver pragmatic commercially based advice that helps organisations achieve their long-term business objectives.

In particular, Simon has a proven track record of working in partnership with organisations to advise on strategic policy reviews that bring competitive advantage to a business. He is able to work with senior managers, giving them confidence to apply new processes and policies that ensure internal reviews and policy changes are successfully implemented.

In addition, he supports clients through complex employee relations and structural change issues and is a successful advocate in Employment Tribunals throughout the UK and in the Employment Appeal Tribunal.

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About Our Reports

At DMH Stallard, we take pride in our commitment to our clients and building long term relationships with them. That's why we commissioned our Strategic Advisor for Manufacturing, David Seall, formerly CEO of EEF South, to work with us on a series of reports aimed at helping those in the manufacturing sector.

Our first report, *Plan, Protect and Prosper, How Manufacturers Leverage IP to Create Value and Safeguard their Futures*, was published in May 2011. The report was based on interviews with directors of major UK manufacturing businesses operating globally – and details how best to protect high value design and process innovations and how to overcome potential pitfalls.

The report has become an essential touch-point for all manufacturing businesses, particularly in light of the recommendations made in the Government's Hargreaves Report that was published at the same time.

Plan, Protect and Prosper is available to download from the DMH Stallard website or by emailing:

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Ethics and Compliance, How Manufacturers are Embracing the Challenge and Reducing their Risk, is the second report in DMH Stallard's series. Further reports are due to be published early in 2012.

If you would like further information or would like to share your views on any of the issues raised in our reports then please visit our blog at:

davidseal.co.uk/blog

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About DMH Stallard

DMH Stallard is dedicated to making our clients the centre of our business and delivering technical excellence, so we can work together as legal and commercial partners. The firm invests in building long term relationships with its clients, so we can support their strategic objectives and deliver solutions that are needs driven.

Our practice has been developed to provide users of traditional City firms with a genuine alternative. To put it simply, our clients benefit from technically excellent advice led by senior partners whilst enjoying sensible and transparent pricing structures.

We are proud to work with some of the most innovative and successful organisations in the country and have a long history of advising the manufacturing and technology sectors. We are also delighted that the firm continues to be recognised with prestigious awards.

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"We require high service levels and an innate understanding of our business. DMH Stallard has brought together a team of lawyers with specialist sector knowledge to advise us. I have no hesitation in recommending the firm."

Managing Director, Pan-European Hi-tech Manufacturing Company

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