

Ethic Codes and Codes of Conduct 'Implementation' June 25, 2014



Building Competence. Crossing Borders.

Richard Norman LLM
Solicitor of the Supreme Court, England
rn@businesslawconsultancy.com

WHY?

- Why have a code at all?
- Reputation
- Legal Issues (FCPA/ UK Bribery Act)
- Other Reasons?
- Corruption spreads
- ‘Simply because it is the right thing to do’
- Damage limitation
- No code implies no standards

FIFA CODE OF ETHICS, 2012 EDITION

“FIFA bears a special responsibility to safeguard the integrity and **reputation of football worldwide**. FIFA is constantly striving to protect the image of football, and especially that of FIFA, from jeopardy or harm as a result of illegal, immoral or unethical methods and practices.”

— Preamble, FIFA Code of Ethics

Gifts and other benefits (FCE art. 20 (2))

◆ **Cash may NEVER be offered or accepted**

You **MUST** refrain from any action or behaviour that might give rise to an **appearance or suspicion** of misconduct —
FCE art. 21(3)

Acting with Integrity around the Globe

Integrity is fundamental to the **Coca-Cola Company**. Along with our other values of leadership, passion, accountability, collaboration, diversity and quality, it is a pillar of our 2020 Vision.

Integrity means doing what is right. By acting with integrity, we reflect positively on the value and reputation of the Company and its brands in the over 200 countries where we operate.

We all want to do what is right, for ourselves and for the Coca-Cola Company. **The Code of Business Conduct will help guide us.** The Code defines how employees should conduct themselves as representatives of The Coca-Cola Company. The Code addresses our responsibilities to the Company, to each other, and to customers, suppliers, consumers and governments.

We all must follow the law, act with integrity and honesty in all matters, and be accountable for our actions.

Implementation Issues

- Non-consultation/democratic deficit
- No 'Buy – In' by those affected
- Cynicism/resistance as a result
- Sustainability after the first roll out
- Just one of multiple corporate policies
- Cross-cultural misunderstanding
- Mixed messages (Sales targets come first)

Solutions

- Clearly define key principles/objectives
- Management support/leadership
- Ownership by the business leaders
- Training
- Consultative approach from the outset
- Regularly refresh and renew

Conclusions

- Recognise the challenges
- Clarity of objectives
- Cultural sensitivity
- Seek buy-in – not imposition
- Roll-out with case studies
- Consistency in application and messaging
- Audit from time to time/transparency
- Part of the wider question of good governance