

Creating a Culture of Corporate Ethical Values Company-wide

Third Party Integrity Risk Management

PwC Office, Moscow

31 January 2012



Why we need the highest standards consistently applied



- We are a major international company expanding beyond our traditional markets
- We are subject to laws in different jurisdictions
- We are subject to norms of business to protect our reputation
- Preventative measures are required
- Our policies and procedures must reflect this
- (UK Bribery Act provides very useful template in the six principles)

Specific measures to develop the culture of ethical values



- Standards and Procedures
- Company Values – Safety, Leadership, Performance and Integrity are all evaluated in individual performance management
- Network of Ethics Experts covering all separate units
- Conflict Commissions
- Integrity Commission
- Townhalls and other communication and training
- Technology to aid disclosure, monitoring and reporting
- Reports and investigations