

**Социокультурные аспекты
предпринимательской деятельности /
Socio-cultural aspects of entrepreneurship**

Оригинальные статьи / Original articles

<https://doi.org/10.24182/2073-9885-2020-13-4-229-246>



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**What components should an ethics and compliance program
consist of to help organizations remain ethical
and compliant in times of crisis and beyond?**

Annotation: *Organizations currently face many challenges due to the COVID-19 pandemic. In similar times of crisis, it is of the utmost importance for organizations to remain ethical and compliant with the law as well as with the temporary measures imposed on them by States. Ethics and compliance programs help organizations behave ethically and in compliance with all rules in a structured and comprehensive way. The paper analyzes selected models of an ethics and/or compliance program with the aim to find out what components an ethics and compliance program should contain in order to be effective in ensuring ethical and compliant behavior of an organization at all times including unexpected crises.*

Keywords: *analysis, comparison, crisis, components, ethics program, ethics and compliance program, model.*

Acknowledgements: This work was supported by The Slovak Research and Development Agency under the contract no. APVV-16-0091.

Introduction. Many unethical and illegal practices still take place in the business environment, one of the most prominent global problems being corruption (Remišová and Lašáková, 2017; Zemanovičová and Vašáková, 2017). Moreover, the current COVID-19 pandemic has been affecting citizens as well as organizations around the world. In order to stop the spread of the virus, States have implemented measures that impose new obligations on organizations. In addition, this pandemic puts a lot more pressure on them to remain ethical and compliant than usual. Whether in times of crisis or not,

organizations have the responsibility to manage the behavior of their employees and their own, too. Therefore, they should have instruments in place to ensure their conduct is in line with the legal and ethical requirements. Organizations can also influence the behavior of other stakeholders such as suppliers or customers (Hoekstra and Kaptein, 2020). Kaptein (2017) suggests that remaining ethical requires struggle from organizations and a crisis is one of such struggles. He also points out that new, more demanding ethical norms have emerged as a result of crises. Indeed, many organizations have resisted unethical practices so far during this pandemic and what is more, they have engaged in activities to fight against the new coronavirus even if they are in a difficult situation (He and Harris, 2020). The current circumstances stress out the importance of a right approach to ethics management in organizations and make organization assess whether their ethical mechanisms can assure the ethical and compliant behavior even in times of crisis, in other words, make them question whether their ethics and compliance program is truly effective.

Theoretical review. Scientists have not yet agreed on one common definition of an ethics program, a compliance program or an ethics and compliance program. For Brenner (1992), an ethics program «is made up of values, policies and activities which impact the propriety of organizational behaviors»(p. 393). According to this author, each organization has an ethics program even if it is not explicitly created and implemented in an organization since ethics programs contain not only explicit, but also implicit parts — the components such as the corporate culture, valued behaviors, management behaviors or incentive systems. Explicit or tangible components include, among other things, codes of ethics, ethics seminars, management ethics decisions or internal control systems. Weaver, Treviño, and Cochran (1999A) consider formal ethics programs to be «organizational control systems aimed at standardizing employee behavior within the domain of ethics and legal compliance»(p. 42). Weaver and Treviño, (1999) specify that the aim of these control systems is to «create predictability in employee behavior and correspondence between specific employee behaviors and more general organizational goals and expectations»(p. 317). Similarly to Weaver, Treviño, and Cochran, Kaptein (2009) also regards an ethics program to be one of the control systems in an organization since he defines ethics programs «as the formal or tangible organizational control systems designed to create an ethical culture, and to, directly or indirectly, impede unethical conduct and promote ethical conduct» (p. 264). According to Walker (2006), «a compliance programme is a formal system of policies and procedures adopted by an

organisation with the purpose of preventing and detecting violations of law, regulation and organisational policy and fostering an ethical business environment» (p. 71). Majluf and Navarrete (2011) define compliance and ethics programs as «the way companies make explicit their guidelines for ethical behavior in terms of basic principles and values, strategies, and company policies, as well as in terms of well-defined norms and rules such as the expectation that all employees should observe the law, honor contracts, and follow regulations» (p. 568). Remišová (2015) understands an ethics program as an integrated system of «beliefs and values, mechanisms, processes and ways of communication which the organization adopts for a long-term and continuous development of ethics in its organizational culture» (p. 80). Remišová and Bohinská (2017) describe a compliance program as «a set of internal policies, procedures and instruments, which regulate the organization's behavior, i.e. behavior of its owners, management and employees, so that the law is not violated during any activity undertaken by the organization» (p. 12). Martineau, Pauchant and Johnson (2017) explain that ethics «programs are usually put in place with the common objectives to assure integrity and to prevent corporate deviance and the occurrence of ethical scandals. They seek to improve the ethical behavior of employees and managers, in compliance with organizational rules and standards, and in line with corporate values» (791).

Research approach. Models of an ethics program or of an ethics and compliance program have been created not only by governmental or non-governmental institutions, but also by experts from advisory companies, including centers for business ethics, and scientists. When looking at different models, the following question occurred: *What components should an ethics and compliance program consist of in order to be effective in promoting ethical and legal behavior and in preventing unethical and illegal behavior in an organization?*

To find an answer to the research question, selected existing models of an ethics and/or compliance program were explored from three sources: (1) governmental, intergovernmental and international organizations (institutional models), (2) advisory companies including centers for business ethics (expert models), (3) scientific literature in the field of business ethics (scientific models).

Table 1 contains a list of all studied models and specifies which models were further thoroughly analyzed.

Together, 5 models from the first source category, 4 models from the second and 12 models from the third source category were studied. Due to the scope of this paper, the number of models that underwent further analysis was cut. In the

Table 1

A complete list of studied models ¹

Model	Author/s	Year	Included in further analysis
<i>Institutional models</i>			
FSGO model	United States Sentencing Commission	1991	Yes
Business ethics: a manual for managing a responsible business enterprise in emerging market economies	U. S. Department of Commerce, International Trade Administration	2004	No
Good practice guidance on internal controls, ethics and compliance	OECD	2010	Yes
ISO 19600, Compliance management systems — Guidelines	ISO	2014	Yes
Evaluation of corporate compliance programs	U. S. Department of Justice, Criminal Division	2019	No
<i>Expert models</i>			
ComplianceProgramMonitor ^{ZfW}	ZfW	2009	Yes
BCFG: Development model for organizational integrity	SIO	2014	No
Global ethics and integrity benchmarks	Dubinsky, J.E., Richter, A.	2015	Yes
Ethics and compliance framework	Deloitte	2015	Yes
<i>Scientific models</i>			
Structural and behavioral dimensions of an ethics program	Brenner, S. N.	1992	No
12 steps to building a best-practices ethics program	Navran, F.	1997	No
Model of an ethics program	Weaver, G.R., Treviño, L.K., Cochran, P.L.	1999	Yes
Four P's of ethical business	Spiller, R.	2000	No
The development framework of ethical structures	Morris, M.H., Schindehutte, M., Walton, J., Allen, J.	2002	No
A framework for organizational virtue	Whetstone, J.T.	2005	No
Model of an ethics program	Kaptein, M.	2009	Yes
Measures of business ethics implementation	Belak, J., Duh, M., Mulej, M., Štrukelj, T.	2010	No
Corporate model of sustainable business practices	Svensson, G., Wood, G., Callaghan, M.	2010	Yes
Model of a compliance and ethics program	Majluf, N. S., Navarrete, C.M.	2011	Yes
Optimal ethics systems model	Collins, D.	2015	Yes
Six-orientation model	Martineau, J. T., Johnson, K.J., Pauchant, T.C.	2017	Yes

¹ The table is created by the author.

case of institutional models, models relating to a large number of organizations and/or those that other models are derived from were selected. As for the expert models, a very complex step-by-step model developed for the certification purposes was excluded. Finally, those scientific models were chosen that other authors refer to in their works as well as more recent process models and one of the latest models, which brings a slightly different perspective on the issue.

Models developed by governmental and intergovernmental institutions, and international organizations. The Federal Sentencing Guidelines for Organizations (hereinafter referred to as *FSGO*), adopted in the U.S.A. in 1991, provided one of the first comprehensive models of an effective compliance and ethics program. Although this model is relevant primarily to U.S. organizations and organizations operating in the U.S. market, it has also served as inspiration for legislators and organizations from other countries as well as scholars in developing their models. The model contains minimal requirements for organizations to consider if they want to be effective in preventing and detecting criminal conduct and promoting law-compliant and ethical organizational culture. It consists of seven components (United States Sentencing Commission, 2018).

Good practice guidance on internal controls, ethics and compliance, approved by the OECD Council in 2010, includes a model of an ethics and compliance program that is not binding for organizations. Its aim is to help organizations establish effective internal controls, ethics and compliance programs so that they are able to prevent and detect corruption of foreign public officials in international business transactions. It includes 12 components (OECD, 2010).

The international standard *ISO 19600 Compliance management systems — Guidelines* (hereinafter referred to as *ISO 19600*), created by the International Organization for Standardization in 2014, is based on the Australian standard AS 3806 Compliance programs from 2006. There is an obvious shift in the approach to the issue that can already be observed from the naming of the standards. *ISO 19600* emphasizes the responsibility of governing bodies and management in organizational compliance. It should be noted that the standard covers not only compliance with relevant laws, industry codes and organizational standards, but also standards of good corporate governance, best practices, ethics and company expectations. *ISO 19600* defines seven key themes — context of the organization, leadership, planning of the compliance management system, system support, implementation of the system, regular evaluation of the effectiveness of

the system, continuous improvement of the system to ensure its suitability, adequacy, and efficiency. Each theme encompasses a number of components that an organization should implement to promote compliant behavior. In total, the model contains 24 components (ISO, 2014).

Table 2 provides an overview of the components of three analyzed institutional models.

Table 2

Overview of the components of the analyzed institutional models ²

FSGO model – United States Sentencing Commission (1991)	Good practice guidance on internal controls, ethics and compliance – OECD (2010)	ISO 19600 - ISO (2014)
Oversight by high-level personnel, individuals with operational responsibility, adequate resources	Strong and visible support and commitment from senior management	Leadership commitment
	Supervision by senior representative/s, autonomy, adequate resources	Good governance principles
		Provision of resources
Standards and procedures to prevent and detect criminal conduct	Clearly articulated and visible corporate policy	Understanding the organization and its context
		Understanding needs and expectations of interested parties
		Scope of compliance management system
		Compliance obligations
		Compliance risks
		Compliance policy
		Plans to achieve compliance objectives
Due care in delegating substantial discretionary authority	Accountability at all levels	Roles, responsibilities, authorities
	Applicability at all levels	
	Applicability to business partners (if possible)	
Clear and regular communication including training programs	Regular communication and training	Competence and training
	Encouragement of compliance with the program	Awareness
		Communication
	Financial and accounting procedures	Documented information
		Operational planning and control
		Controls and procedures
		Control of outsourced processes

² The table is created by the author.

FSGO model – United States Sentencing Commission (1991)	Good practice guidance on internal controls, ethics and compliance – OECD (2010)	ISO 19600 - ISO (2014)
Monitoring, auditing, periodical evaluation of the program, mechanisms for confidential and anonymous reporting	Guidance and advice, confidential reporting of violations, undertaking of actions	Monitoring, measurement, analysis, evaluation
		Audit
		Management review
Appropriate incentives and disciplinary measures	Appropriate disciplinary procedures for violations	
Response to the criminal conduct, modifications of the program	Regular review of the program	Noncompliance, corrective actions
		Continuous improvement

Although the *FSGO model* contains only seven components, it covers most of the themes of the more elaborated models of OECD and ISO. The *FSGO model* does not include any mention of operations though. In addition, its components are just key principles. While still quite general, *Good practice guidance on internal controls, ethics and compliance* comes with more detailed information on each component. On the other hand, *ISO 19600* provides a quite detailed description of each theme including a number of specific components and actions. It also clearly links these components together. Even if general (i.e. not designed for a specific size of an organization or a sector), *ISO 19600* can serve as practical guidance with many specific examples for execution of each component. The measures imposed by the FSGO or recommended by OECD are also covered by *ISO 19600*. The only components not explicitly included in *ISO 19600* are the disciplinary measures and incentives for ethical and compliant behavior.

Models designed by advisory companies and experts in business ethics. A German center for business ethics — Zentrum für Wirtschaftsethik (ZfW) — contributed to the international discussion on what compliance means for organizations and how compliance issues overlap with the management systems by designing the *ComplianceProgramMonitor*^{ZfW}. It should be noted that the term compliance is understood more broadly in this model, too. In addition to laws and regulations, organizational principles, internal regulations and rules, this term also relates to compliance with the principles of good corporate governance and generally accepted ethical norms. Thus, it can be assumed that similarly to *ISO 19600*, this model is a model of an ethics and compliance program, not just of a compliance program. The model contains ten components, which are assigned to one of three stages — development, implementation, review (Zentrum für Wirtschaftsethik, 2009).

In 2009, Dubinsky and Richter presented a universal model for the systematic development of ethics and integrity in organizations, which they called *Global ethics and integrity benchmarks*. Their model can be applied in organizations across all industries and is intended primarily for large and medium-sized organizations. As the requirements for ethical behavior of organizations increase, Dubinsky and Richter, together with the expert panel, reworked the model in 2015. The current model consists of three groups — foundation, ethical culture, ethical risk management. Every group contains several components, with 13 components in total (Dubinsky and Richter, 2015).

Deloitte, one of Big4 companies, created their *Ethics and compliance framework* which considers a culture of ethics and compliance as the core component of an ethics and compliance program. In addition, the model includes nine other components of the program divided into three phases — design, implementation, assessment. The framework also suggests that the program is supported by technology, processes and people (Deloitte, 2015).

The list of the components of three analyzed expert models is captured in Table 3 below.

Table 3

Overview of the components of the analyzed expert models ³

Compliance Program Monitor^{ZW} – ZfW (2009)	Global ethics and integrity benchmarks – Dubinsky and Richter (2015)	Deloitte's Ethics and compliance framework (2015)
Leadership and corporate culture	Vision and goals supporting ethics and integrity	Culture of ethics and compliance
	Ethical leadership	Governance and leadership
	Ethical organizational culture	
Code of ethics	Assessment of ethical and reputational risks	Risk assessment and due diligence
Code of conduct		
Policies and procedures	Compliance with law and rules	Standard, policies and procedures
Organization – responsibilities, steering committee, office, whistleblower system	Qualifications, roles, responsibilities	
Communication and training	Communication	Training and communication
	Training	
	Balance between confidentiality and transparency	

³ The table is prepared by the author.

Compliance Program Monitor^{ZfW} – ZfW (2009)	Global ethics and integrity benchmarks – Dubinsky and Richter (2015)	Deloitte’s Ethics and compliance framework (2015)
Compliance in HR	System to manage conflicts of interest	
	Elimination of a possibility of fraud, bribery and corruption	Third party compliance
Transparency – risk screening and control of risk management	Whistleblowing and investigations	Employee reporting
Monitoring		Case management and investigations
Audit		Testing and monitoring
	Disciplinary and reward measures	
		Continuous improvement

As it is visible from this summative table, three models are balanced in terms of the number of components. Some of the components they include are similar (such as ethical organizational culture, communication and training, risk management), some differ. For example, *Compliance Program Monitor^{ZfW}* emphasizes processes in HR, *Global ethics and integrity benchmarks* focuses on fraud, bribery and corruption, and *Ethics and compliance framework* includes third-party compliance. Moreover, these models all have a slightly different approach to building an ethical organization. As an illustration of this distinction, *Compliance Program Monitor^{ZfW}* divides its components into three consecutive stages, while Dubinsky and Richter’s model splits the components into three categories and at the same time, the advancement within each component is described. Deloitte’s framework depicts an iteration of a repetitive process that consists of ten components.

Models developed by scientists. Weaver, Trevico and Cochran (1999B) presented their theoretical model of an ethics program based on their research held in 1995. It consists of seven components. Kaptein (2009) came up with a model of an ethics program encompassing nine components. Svensson, Wood and Callaghan (2010) developed a model that captures a continuous and iterative process which begins with the requirements of the market or society. The organizational values and norms should match these requirements. It continues with the activities an organization performs, guided by values and norms, the activities are perceived and later evaluated by internal and external stakeholders and the process restarts at this stage. The *Corporate model of sustainable business*

practices, as they named it, is therefore based on the obligations and responsibilities of the organization to internal and external stakeholders. It contains five interconnected components — foundation, communication about the code of ethics, guidance, outcome and reconnection — which consist of a number of sub-components, 18 in total.

Although Majluf and Navarrete (2011) introduced only a two-component compliance and ethics program model, the first being implicit component, the second explicit component, their model has a number of sub-components. The explicit component covers all formal systems and procedures that aim to ensure ethical conduct in an organization. The implicit component of the model includes those sub-components that support ethical behavior but are neither formal nor exact. In fact, they created a model with 13 components. Collins (2015) designed the *Optimal ethics systems model* to help organizations enhance their ethical behavior and socially responsible outcomes. In addition to the governance mechanisms, the basis of the model, the model consists of other 12 components grouped into 5 categories — hiring, orientation, training, operations, evaluation. Martineau, Pauchant and Johnson (2017) did not find the existing models of an ethics program sophisticated enough for the current complex business environment. Therefore, they offered their *Six-orientation model* of an ethics program which consist of 33 components divided into 6 areas — structural practices, social and environmental responsibility practices, consultation and participation practices, experiential ethical development practices, detection practices and normative practices.

Table 4 provides a list of components of the analyzed scientific models. The increase in number of components included in models over two decades is the most evident in this category of models. The latest analyzed model from 2017 contains 33 specific components, some of them quite innovative, compared to 7 components of the model from 1999. On the other hand, the latest model (*Six-orientation model*) does not include components such as the evaluation of the program or its components and improvement based on the findings. In general, models from the 2010's are more elaborated, they also emphasize the importance of different HR practices in building ethical organization. In addition, three of the models from the last decade encompass components that reach outside of an organization and are aimed at positively impacting society.

Discussion. As noted in the previous sections, the described models differ in the number of components (from 7 to 33) as well as the degree of elaboration and details of individual components even within each category. The *FSGO*

Table 4

Overview of the components of the analyzed scientific models ⁴

Model of an ethics program – Weaver, Treviño, Cochran (1999)	Model of an ethics program – Kaptein (2009)	Corporate model of sustainable business practices – Svensson, Wood, Callaghan (2010)	Model of a compliance and ethics program – Majluf, Navarrete (2011)	Optimal ethics systems model – Collins (2015)	Six-orientation model of an ethics program – Martineau, Johnson and Pauchant (2017)
Top management involvement/commitment		Support in strategic planning	Ethical leadership	Governance mechanisms	Budget for ethical management /initiatives
Ethics-oriented policy statements	Code of ethics	Code of ethics	Code of ethics	Code of ethics and conduct	Code of ethics
Procedures for dealing with ethics-related issues				Ethical decision-making framework	Code as a management tool
					Policies and procedures for handling complaints
					Ethical decision-making framework
Ethics personnel and offices	Ethics office/officer	Ombudsman	Ethics committee		Ethics office
		Ethics committee			Management position in ethics
	Managerial and employee accountability	Ethics training committee			Ethics committee
					Research center
Ethics communication, training and investigations	Ethics training and communication	Communication to employees	Open communication	Ethics training	Consultant
		Communication to new employees	Ethics training		Workshops using meditation, silence, ...
		Communication to suppliers	Orientation programs		Workshops on well-being
		Communication to other stakeholders	Ethical climate		Ethics workshops based on art
		Ethics training	Organizational culture	Participatory empowerment	Coaching / Mentoring program
					Dialog sessions
					Roundtables
					Immersion in nature activities
					Case studies
					Contemplation, prayer, silence in meetings

⁴ The table is created by the author.

Model of an ethics program – Weaver, Treviño, Cochran (1999)	Model of an ethics program – Kaptein (2009)	Corporate model of sustainable business practices – Svensson, Wood, Callaghan (2010)	Model of a compliance and ethics program – Majluf, Navarrete (2011)	Optimal ethics systems model – Collins (2015)	Six-orientation model of an ethics program – Martineau, Johnson and Pauchant (2017)
					Employees' participation in ethical initiatives
	Pre-employment screening	Ethical performance appraisal	Evaluation of performance	Job applicant ethics	Pre-employment screening
			Incentive system and promotion policies	Respect employee diversity	Ethical criteria in evaluation
				Leadership, goals, appraisals	
					Accounting systems and procedures
		Resolving ethical and sustainable problems in the marketplace and in society		Product/service accountability	Purchase of fair-trade products Partnership with NGOs
		Assisting the bottom line		Environmental management	Corporate activism Social and environmental reporting
				Community outreach	Research and development Promotion of environmental practices
					Surveys
Telephone reporting and advice systems (hotline, helpline)	Dedicated telephone line (hotline, helpline)	Audit	Line of reports	Ethics reporting system	Ethics hotline or helpline
	Internal monitoring, audits	Support to whistleblowers			Program for whistleblowers
					Use of the information verification agency
	Incentives, rewards	Consequences for a breach of the code	Sanctions and disciplinary measures		
Regular evaluation		Evaluation of a code of ethics	Investigation of allegations, corrective actions	Best practices assessment for continuous improvement	
		Control and adjustment of practices			

model of an effective compliance and ethics program consists of only seven components, which are considered to be minimal requirements for

organizations. The components represent broad principles, and the model gives organizations freedom to design programs which suit their needs.⁵ However, this model has served as inspiration for other authors who have created more complex and detailed models. Furthermore, no matter the source of the model, it can be noted that older models contain less components — the number of components included in models have increased over time. The models from the 1990s (the *FSGO model* or the *model of Weaver, Trevico and Cochran*) are relatively simple. However, since their creation, society had to deal with major organizational scandals at the beginning of the millennium and the global financial crisis of 2007–2008. Following these events, several laws came into force and regulations and recommendations were issued to prevent the unethical and illegal behavior of organizations (Peterson, 2013). These laws and regulations have imposed new responsibilities on organizations. Moreover, society has also begun to have greater demands when it comes to the conduct of organizations. Organizations are expected to behave not only legally but also ethically and even take on new responsibilities (Crane and Matten, 2016; Freeman, 2010; Porter and Kramer, 2011). Therefore, simple models represent only a necessary minimum for an effective ethics and compliance program. Recent models contain a wider range of components and seek to include relatively specific practices — for example, *ISO 19600* from 2014 consists of 24 components and the latest of the described models — *the Six-orientation model* from 2017 — includes 33 components.

When analyzing existing models, it became evident that the majority of them capture either explicitly or implicitly an iterative process. This is in line with the recent findings of other studies (Hoekstra and Kaptein, 2020; Lašáková, Remišová and Bohinská, in press). Even the graphic representation of some of the models (e.g. *Ethics and compliance framework* developed by Deloitte) depicts a circle that repeats. In addition, although only 5 of the 11 analyzed models include a modification of the program or continuous improvement as one of the components, an evaluation of practices/components or an audit are part of four other models. Therefore, it can be assumed that authors of such models expect that further steps should be taken as a result of an evaluation or an audit as/if necessary. As for the differences between the three categories relating to a review or modifications of the program, all analyzed

⁵ Desio, P. <https://www.ussc.gov/sites/default/files/pdf/training/organizational-guidelines/ORGOVERVIEW.pdf>.

institutional models take into consideration that the program cannot be static due to constant changes in and outside organizations. They contain regular or irregular revisions and amendments of the program and even its improvement as components. On the other hand, some of the expert models and scientific models (even if the minority) neglect this component.

Out of the analyzed models, only the *model of Majluf and Navarrete* categorize components as either implicit (informal) or explicit (formal). Besides the *Kaptein's model* with purely formal components, the rest of the models contain both formal and informal components to some extent. Even if some authors (Brenner, 1992; Majluf and Navarrete, 2011) conclude that the informal components can have a higher positive impact on the ethical behavior than the formal ones, none of the analyzed models encompass only informal components. This is logical as an ethics and compliance program influence and regulate all organizational activities, therefore, its formal side emphasizes its importance.

Some of the analyzed models do not focus only on internal stakeholders and their conduct but also on external stakeholders. While a few models aim to shape the behavior of selected external stakeholders, others' goal is to support and promote ethical behavior in the market and society. As examples of the former, *Good practice guidance on internal controls, ethics and compliance* extend the requirements of ethical and legal behavior to business partners or Deloitte's *Ethics and compliance framework* suggests third-party compliance. Other models intend to impact external stakeholders indirectly — whether it is taking into account relevant requirements and expectations of important external stakeholders when creating the program (*ISO 19600*), communicating about the ethical direction of the organization towards external stakeholders (*Corporate model of sustainable business practices*, *Global ethics and integrity benchmarks*, *Six-orientation model*), developing and producing responsible products or services or being accountable for them (*Optimal ethics systems model*, *Six-orientation model*), or including components covering different levels of social responsibility (*Corporate model of sustainable business practices*, *Optimal ethics systems model*, *Six-orientation model*). While there are models in each category that contain components influencing external stakeholders, scientific models come up with the widest range of components, some of them call for accountability for products as well as organizational activities and active involvement in promoting ethical behavior not only inside but also outside an organization.

Thanks to the comparative tables, it was easy to identify those components that most of the models have in common. Every model consists of a formal

document setting out standards of conduct which can be complemented by other policies and procedures. The majority of scientists refer to this formal document as a code of ethics. In addition, communication and training is included either as one or two separate components in each model. Besides, ethical leaders or commitment of leaders' to ethics, appointing individuals or other entities responsible for ethics in an organization, assigning resources for the program, monitoring, hotlines or mechanisms for reporting, rewards and disciplinary measures, an audit or an evaluation of the components, their adjustment or the program improvement are all part of most models in all three categories. There is also a number of unique components or of components included in a couple of models that can still be considered by those organizations which review the effectiveness of their program during the COVID-19 pandemic, or see a need for preparing a more robust program.

As for the institutional models, the *FSGO model* provides minimal requirements and the *OECD model* minimal recommendations for organizations for their programs to be effective. So, they both give organizations minimal guidance and advise what their program needs to definitely include. The expert models seem to form a bridge between the institutional and scientific models. All three analyzed expert models emphasize ethical corporate culture which is also accentuated in many scientific models, but they also focus on risk management that seems to fall out from the analyzed scientific models. In that sense, the expert models resemble more to the institutional models that are mainly aimed at reducing the risk of illegal behavior. There is an apparent difference in the naming of individual components between the three categories, too. Scientists use specific names for components such as an above-mentioned code of ethics instead of a formal document or an ethics officer instead of an oversight or supervision. The terminology might be different, but these different terms mostly refer to similar or even the same components.

Conclusion. This paper has attempted to contribute to the current discussion on how organizations can remain ethical during a crisis such as the COVID-19 pandemic and beyond. As implementing isolated ethical measures or mechanisms can hardly assure ethical and compliant behavior in today's complex environment (Bohinská, 2018), an ethics and compliance program consisting of a number of different components needs to be adopted and integrated in all daily activities of an organization. Cosmetic ethics and/or compliance programs that organizations adopt proved to be window dressing, thus ineffective in promoting ethical behavior and detecting unethical and illegal behavior (Krawiec, 2003). Therefore, the

paper looks at selected models of an ethics and/or compliance programs to find out what components should an ethics and compliance program contain in order to be effective in ensuring ethical and legal behavior. Models developed by institutions, advisory companies, including centers for business ethics, and scientists from the field of business ethics are chosen to explore the view of legislators and regulators, experts from practice as well as scientists on what an effective ethics program or an ethics and compliance program should include. Connecting these different views seems to be useful as they complement each other. The institutional view focuses more on compliance and formal components, while scientists attach more importance to informal components and involve external stakeholders to a much bigger extent. The expert view bridges both institutional and scientific views.

The paper analyzes only selected 12 models which can be considered as its main limitation. In addition, it simply enumerates the components of an effective ethics and compliance program. On the other hand, even a list of components that most of the analyzed models have in common, namely leaders' commitment to ethics and their active involvement and support, a code of ethics and other supporting policies, adequate resources for ethics, an ethics officer, an integration of the program, communication, ethics training, monitoring, ethics hotlines and helplines, evaluation of the effectiveness of the program, rewards and disciplinary measures, corrective actions and continuous improvement, can help organizations to identify missing parts when reviewing their own program. Moreover, organizations can get inspiration from a list of innovative components and decide if such components could help in their particular cases. Besides practical implications, the paper presents an analysis and subsequent comparison of different models of an ethics and/or compliance program that has not yet appeared in the scientific literature.

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