

Handling Ethical Concerns: A Guide for Managers

As a manager, one of your top responsibilities is to uphold the company's commitment to the highest ethical standards in every aspect of our work. Our commitment to these standards is a cornerstone of our values and culture. It defines who we are to each other, to our clients and to the world around us.

Although new employees receive ethics training, it's not uncommon for employees to encounter situations they don't know how to handle. At those times we want them to seek a manager's guidance and support.

You could be that manager. This tip sheet is provided to help you understand better how to fulfill your role in these situations.

No. 1: Create an environment where staff members feel comfortable bringing you their concerns.

This means letting employees know that you will always be available to hear their ethics-related concerns, that their concerns are important, and that you and the company will treat them seriously and respectfully. It means letting them know there will be no penalty or retaliation for reporting these concerns honestly and fully. If you see or hear of any type of retaliation against an employee who has reported a problem in good faith, contact your manager immediately.

It also means that when you listen to an employee's concern, you do so in a manner that underscores your sincere interest:

- Find a private place to talk. Thank the employee for coming forward with their concern. Explain that the conversation will be kept confidential among those who need to know.
- Focus; don't be distracted by your email or phone. Encourage the employee to tell you everything they know about the situation. And don't interrupt except to seek clarification, to ensure that you understand the circumstances correctly.
- Treat the issue seriously and work toward a prompt and effective solution.

No. 2: If you believe you know how the situation should be handled, don't simply tell the employee what to do or what will be done; explain why that resolution is the proper one.

Treat the discussion as a learning opportunity. Help the employee see how the company's ethical guidelines apply in the given situation. Then, on the same day, make sure you report the conversation – including your part and the resolution – to one of your managers, at least at the group leader level. This will ensure that your manager is apprised of the situation and he or she can provide additional input as needed.

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No.3: If you don't know how the situation should be handled, admit it. Tell the employee you will find out and do so expeditiously. Remember, once the employee brings you the concern, it is your responsibility to make sure that it is appropriately addressed.

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WHERE TO GO FOR HELP

- Many people within your organization should be available for guidance. They include:
 - Your supervisor
 - Your supervisor's supervisor
 - Your team/office/regional leader
 - Your CEO, CFO, General Counsel, or relevant Human Resources contact
- Additionally, there are other ways to report ethical concerns:
 - HELPLINE PHONE NUMBER AND EMAIL
 - HOTLINE PHONE NUMBER

No. 4: After your conversation with the staff member, record what he or she told you and review the notes with your manager/team/office leader. Document the action taken, and which manager(s) you consulted. As needed and appropriate, follow up with the reporting employee after the issue is resolved. Share with the employee specific actions taken.

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IN SUMMARY, LEAD WITH INTEGRITY AND SUPPORT YOUR ETHICAL CULTURE.

Ethical behavior is a vital foundation of your company. Managers like you play a crucial role in upholding that foundation. It is your responsibility to encourage open and honest discussion by creating an environment where your team feels safe asking questions or discussing potential problems, and to ensure that the company deals properly and quickly with any issues that may arise.

Please make sure you're familiar with the company's code of conduct, relevant policies and procedures, which you can find on your company's intranet site. And please don't hesitate to contact any of the individuals noted above when an ethical issue arises.

If you have suggestions or questions about this tip sheet, please talk with your manager or with Human Resources.

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