

# Ethics

## Our network's purpose-driven pursuit of quality and integrity

### Home

### Making an impact that matters

### Delivering service that matters

### Building careers that matter

### Having influence that matters

Japan's post-disaster economy

Strengthening humanitarian response to crises

Scaling innovative education solutions

Regulatory and public policy engagement

**Ethics: Delivering quality and integrity**

Independence: Preserving the public's trust

Metrics

Respected organizations around the world trust Deloitte professionals to execute their most ambitious projects, manage highly confidential information, and develop ideas and approaches that can alter the course of their businesses. That trust has been and continues to be earned thousands of times each day by Deloitte member firm people.

Ethical behavior among Deloitte professionals is non-negotiable. That's why DTTL Global Ethics and member firm ethics teams continue to aggressively integrate ethics into key initiatives and processes, stressing quality and consistency of approach across the network.

During the past year, Deloitte enhanced its focus on anti-corruption, appointing a DTTL anti-corruption officer and member firm anti-corruption champions who will work together to build and sustain effective programs. Deloitte Global Ethics launched a new classroom-based ethics training program for the network, and adapted its existing new-manager training session into four short e-learning modules for individuals whose travel schedules make classroom training difficult. DTTL and member firm ethics leaders also developed a new package of measurement and communication tools to gauge and improve the effectiveness of the network's local ethics programs.

Deloitte continues to reinforce its ethics organization, training, and assessment processes because we understand what is at stake—for clients and for us.

### The bigger picture

"Deloitte stakeholders expect our network to lead by delivering quality and acting with integrity. Our member firm ethics programs, with the support of the Deloitte Global Ethics team, help Deloitte people to see that," says Gianmario Crescentino, Deloitte Global Chief Ethics Officer and Managing Director, Risk and Reputation. "To make an impact that matters, each of us has a personal responsibility to conduct business with high integrity, quality, and levels of professional behavior. We recognize that we are all role models to others—and we make decisions that align to our Purpose."

The Deloitte Global Ethics team and the member firm ethics officers work together to design and implement policies and programs to promote and sustain ethical conduct by Deloitte professionals. Ethics training is required for all Deloitte professionals every two years.



Anti-corruption has been a priority for Deloitte Global Ethics in recent years. During FY2015, Deloitte continued to focus on this topic, appointing a DTTL anti-corruption officer and member firm anti-corruption champions. They will work together to build and sustain effective anti-corruption programs. Deloitte Global Ethics also initiated network-building activities, including global and regional webcasts and meetings, to facilitate best-practice sharing. And working groups of member firm anti-corruption leaders were established to develop new e-learning and enhance existing third-party due diligence guidance to help ensure corruption risks are identified and addressed appropriately.

### Education and training enhancements

During the past year, Deloitte Global Ethics launched a new, highly interactive classroom-based ethics training program, suitable for all levels and roles. Sessions focus on discussing dilemmas and stressing the importance of consultation to reach solutions that align with Deloitte's values and principles. The program was rolled out to member firms and the more than 2,000 DTTL professionals.

Deloitte Global Ethics also expanded training opportunities for new managers across the network—a key staff group with important ethical responsibilities for their teams—by creating a modular, e-learning version of their live, new-manager ethics program. This option, which focuses on decision-making skills and being an ethical leader and role model, provides a flexible alternative for the busy and often-traveling manager group.

## Home

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## Delivering service that matters

## Building careers that matter

## Having influence that matters

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Strengthening humanitarian response to crises

Scaling innovative education solutions

Regulatory and public policy engagement

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Deloitte Global Ethics continues to work with learning teams throughout Deloitte to incorporate similar exercises into new-hire orientation, manager training, and other business-focused programs.



For example, during FY2015, Deloitte Global Ethics collaborated with the Deloitte Global Audit Learning team to embed ethics messaging into the "soft skills" and team management elements of the Audit New Manager Transition Experience program. This will include discussion and debrief points in facilitator and coach guides and prework, an additional dilemma for discussion, and enhanced messaging around ethics and integrity. The focus is

on enhancing new managers' understanding of their position as role models and the importance of consultation, as well as developing their ethical risk sensitivity, helping them recognize potential issues.

Deloitte Global Ethics also continued to integrate ethics across the Deloitte University curriculum so that ethics is not treated as a standalone topic, but instead, is part of the conversation across many disciplines. To this end, the network is proactively engaging with other risk areas, such as confidentiality, privacy, and information security, to present a holistic approach to training and awareness across the risk spectrum, with a focus on the importance of speaking up, consultation, and ethical decision making.

### *Measuring impact*

DTTL's ethics practice review program is conducted on a rotational basis to measure member firm compliance with global policy and support continuous improvement in ethics program management. In FY2015, 11 Deloitte member firms were visited by the Deloitte Global Ethics team and other ethics leaders from the member firm network. Reviews conducted this past year focused on (among other things) ensuring that member firm approaches to ethics are proactive, that member firm ethics training and communications are engaging, and that member firm programs are collaborative and linked with other vital business functions, such as Talent and Learning.

DTTL's annual member firm ethics survey continues to be an important tool to measure the effectiveness of member firm ethics programs. The survey captures Deloitte professionals' perceptions of ethical culture, tone at the top, and personal responsibility for ethical behavior. Member firms use the results of the survey to create action plans for continuous improvement of their ethics programs.

DTTL and member firm ethics leaders worked together in FY2015 to develop a new package of tools to measure the effectiveness of member firm ethics programs using a benchmarking survey, ethics maturity model, and focus-group questionnaires. They also created communications tools, including message maps, to support member firm leaders in delivering consistent communication that builds the tone at the top and reinforces the importance of ethics and integrity to their people.

Deloitte member firms strive to uphold the trust placed in them by clients and the capital markets and to build a similar sense of trust among their professionals. One of the most important responsibilities of DTTL and member firm senior leaders is to emphasize commitment to ethical behavior and reinforce the responsibility of everyone in the organization to act with integrity.

The Deloitte Global Ethics team and the member firm ethics officers work closely with senior Deloitte leaders to carry out the organization's ethics programs. These programs are designed to help Deloitte people understand expectations for ethical behavior, develop skills for ethical decision making, and gain the confidence to speak up about challenging ethical situations.

DTTL's formal ethics program is composed of the following elements:

- The Ethical Principles and Shared Values of the Deloitte network;
- A global ethics policy that sets out the requirements for member firms' own ethics programs;
- A global anti-corruption policy that addresses matters such as bribery, facilitation payments, political and charitable contributions, and gifts and entertainment;
- Ethics training programs, including an introductory online course, classroom programs, facilitator-led interactive case discussions and online advanced training course;
- Support activities, including communications, workshops, and webinars to facilitate best practice sharing among member firms;
- Provision of a survey, a self-assessment questionnaire, and other tools (such as focus group guidance) to allow member firms to measure their program's effectiveness; and
- A practice review program to measure compliance with global ethics policies and encourage collaborative discussions and continuous improvement over time.

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In addition, Deloitte plays a role in various multilateral efforts to promote ethical conduct in the business world. The efforts in which Deloitte participates include:

- **World Economic Forum's Partnering Against Corruption Initiative (PACI).**
  - James Cottrell, partner, Deloitte US, is a senior adviser to the PACI Vanguard, a community of 20 global CEOs committed to zero tolerance against corruption;
  - Cottrell is the Deloitte US representative on the Forum's Global Agenda Council initiative on ultimate beneficial ownership.
- **U.N. Global Compact.** Cottrell and Mohammed Ahmed, DTTL Global Anti-Corruption Officer, co-chair a subcommittee on whistle-blower programs as part of an anti-corruption compliance program.
- **Business 20 (B20) Business Summit.** Cottrell is a member of the B20 working group on anti-corruption.
- **Business and Industry Advisory Committee (BIAC) to the Organization for Economic Cooperation and Development.** Lindy Miller, senior manager, DTTL Public Policy, is a member of the BIAC Task Force on Anti-Bribery and Corruption.
- **University of Notre Dame Deloitte Center for Ethical Leadership.** Michael Zychinski, Chief Ethics and Compliance Officer, Deloitte US, sits on the advisory board.
- **Ethics & Compliance Initiative (ECI).** Zychinski is a board member for ECI's Ethics Research Center and its Ethics & Compliance Association.
- **The Conference Board.** DTTL Global Deputy Chief Ethics Officer Jennifer Guethoff is a founding member of The Conference Board's European Compliance Council.



### *Ethical Principles of the member firms of DTTL*

All of the Deloitte member firms have adopted the following Ethical Principles, which provide the foundation for their ethics programs:

- **Honesty and integrity.** We act with honesty and integrity.
- **Professional behavior.** We operate within the letter and the spirit of applicable laws.
- **Competence.** We bring appropriate skills and capabilities to every client assignment.
- **Objectivity.** We are objective in forming our professional opinions and the advice we give.
- **Confidentiality.** We respect the confidentiality of information.
- **Fair business practices.** We are committed to fair business practices.
- **Responsibility to society.** We recognize and respect the impact we have on the world around us.
- **Respect and fair treatment.** We treat all our colleagues with respect, courtesy, and fairness.
- **Accountability and decision making.** We lead by example, using our Shared Values as our foundation.

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