

Ethics And Compliance Whistleblowing Systems In Hungarian Large Companies

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Abstract

In this research we were looking for the answer to the question whether ethics and compliance whistleblowing systems operating in developed countries can also work in large companies in a central European formerly socialist country where on the one hand ethics institutionalization dates back to a shorter period of time and on the other hand people associate whistleblowing systems with the network of informers and if so, how do they work. The aims of this study are: (1) to introduce the theoretical background the concepts of whistle blowing, (2) to describe the results of international and domestic researches regarding whistleblowing systems, and (3) to use quantitative research methods to investigate the characteristics of whistleblowing systems in large Hungarian companies. The empirical survey indicates that company whistleblowing systems work less efficiently in practice in the surveyed company range which might refer to the deficiency in the external and internal ethics communication as well as to the low level of trust.

Keywords: Business ethics, compliance, hot lines, whistleblowing

Introduction

Nowadays phrases like ethics and compliance have become ordinary to be used in corporate practice. In case of both expressions we mean compliance with the norms, but while compliance is the "hard" guideline to observe laws and rules, ethics is the "soft" guideline to observe ethics norms voluntarily and / or the observation is expected by stakeholders. These phrases are often used together indicating that both are very important, the right and proper business behaviour can be realized by applying both aspects together. Integrating ethics and compliance aspects into corporate practice

can be realized with managing them which caused the development of several tools and systems in the previous decades. One of them is the company whistleblowing system which makes it possible to report any kind of ethics and compliance problem, misconduct or question to the company.

Theoretical background

The companies are in constant interaction with their environment. The environmental changes in the previous decades can be described with such key words as globalization, energy crisis, technological revolution and social transformation. Companies are versatile creations which have positive however lots of negative effects as well concerning their wide range of local and global environment (Epstein, 2007). The behaviour of the business sphere is in the centre of attention, there has been a greater demand regarding transparency of corporate business activities and their consequences. It is highly relevant for global businesses facing different cultures (Banutu-Gomez, 2014). They have to comply with strict laws but at the same time they voluntarily lay down those values and ethics norms based on which their business activities are performed. This requirement is expressed by the circle of stakeholders from wider point of view such as by the owners because more and more information is required about the companies so that the advantages and risks of their possible investment can be identified more easily.

The concept of a good company is linked with the idea of corporate social responsibility. There exist several definitions of corporate social responsibility, some define it as a tool, some as a concept while others consider it as a new business model, which require a fundamental change in attitude inferring paradigm shift (Szegeedi, 2014). It assumes the realization of the fact that a company is more than a creation striving after only reimbursement of its capital and maximizing its profit. The company is also a community of people operating in social and natural environment so the environmental and social impacts of its activities must be taken into consideration. Based on the definition of the European Union, updated in 2011, CSR is “the responsibility of enterprises for their impacts on society” (European Commission, 2011, p. 6). There is a clear interaction between the conceptions of CSR and sustainable development. CSR is considered to be an integral part of sustainable development (World Business Council for Sustainable Development, 2000). Corporate sustainability is the company version of sustainable development, while CSR is a voluntary managerial approach to sustainable development (Steurer et al., 2005). According to United Nations Global Compact, (2013) corporate responsibility and corporate sustainability can be used as synonyms. The conception of the responsible and sustainable company not only considers the impact of

business activities on stakeholders but it also means ethical behaviour respecting their interests and values. De George emphasizes that 'corporations have a moral obligation not to harm' (De George, 2010, p. 299). There is a lack between the CSR theories and the practical application and CSR will be a time-consuming challenge in the future as well (Berényi, 2015).

The company whistleblowing system is an important factor of ethics institution system contributing to the integration of ethics in corporate practice (Kaptein, 2009) and in scientific literature it is still classical but at the same time it is also essential to challenge business ethics area (Hoffman-Schwartz, 2015). In order to assert the stakeholders' legal and legitimate expectations they must be given the possibility to communicate them towards the companies. Among others the proper means of such communication can be the company whistleblowing systems however it cannot replace the conversations and other interactions with the stakeholders. The ethical company culture, which is able to prevent unethical behaviour and contributes to developing ethical behaviour, has an essential role in establishing whistleblowing systems. Based on the positive approach, the ethical company culture results in trust within and outside the company. Trust encourages risk taking which can lead to innovation facilitating development and eventually profitability (LRN, 2010). According to the critics of ethics institutionalization we must also see that in practice such goals appeared as well which are far from ethics and are often self-centred for instance the development of the company image or being seemingly socially responsible (e.g. Soutar et al., 1995; Rihma-Meel, 2013), therefore fair ethics is essential (Bouckaert, 2006).

Through the company whistleblowing systems the companies would like to control ethics problems. Reporting issues within the company is considered to be loyal while reporting to an external party is disloyal. Despite this fact the whistleblowers risk retaliation by the organisation (Andrade, 2015), the larger the power of the offender is, and the bigger the dependence of the organization on them, the bigger the retaliation is (Gao et al., 2015). It is not a coincidence that there is a debate whether or not it is a moral obligation to blow the whistle (Hoffman-Schwartz, 2015).

Several different changes can be experienced during the developing process of the company whistleblowing systems. In one respect compliance and ethics aspects more and more often come out together namely we can speak about taking ethical responsibility beyond law. On the other hand companies feel that not only the internal but also external stakeholders' expectations have increased making it possible for them to report ethics/compliance complaints. The company whistleblowing systems allow

not only the investigation of potential misconducts but also help questioners solve their ethical dilemmas.

International experience concerning company whistleblowing systems

In the middle of the 1990s a survey concerning large American companies found that 51% of the surveyed companies had a telephone based system through which employees could have ethical reporting however the index number of 25% of the hot lines was not more than 1call/month/10000 employees (Weaver et al., 1999). In the last few decades the number of companies which try to encourage their employees to report improper behaviour has increased (Hess et al, 2006). Among the 200 largest companies with code of ethics 83% of them operate hot lines and have regulations concerning the reports (KPMG, 2008). The top 50 Financial Transnational Companies and the World's Top 100 Non-financial Transnational Companies ranked by UNCTAD 2007 were investigated, collecting information about company hot lines in the code of ethics and in the compliance programs. 72% of the surveyed non-financial companies had ethics hot lines, 41% of which were connected with the compliance department. In case of financial companies we can find a smaller rate since 58% of the surveyed companies had ethics hot lines and the 64% of them were connected with the audit department. The significant difference between the North-American and the European large companies is that in almost all North-American companies (95%) there are hot lines while in Europe the rate is only 57% (Calderón-Cuadraro et al.,2009). 61% of 3,500 employees from the United States asked by the KPGM Forensic (2013) stated that their company has a confidential and anonymous hotline, which can be used to report misconduct or seek advice. Based on the interview with more than 2,700 executives in 59 countries 51% of businesses have a hotline globally. This rate is 58% in developed markets and 46% in emerging markets (EY, 2014).

Regarding the name, the first empirical researches established that 57% of the telephone lines are called hot lines suggesting that it means an answer to a problem. 29% of them added the word "ethical", 18% of them added the word "compliance". Within the 43%, those who did not use the word hot line, most of them (45%) had the word helpline (Weaver et al, 1999). According to the Calderón-Cuadrado et al. (2009) research large companies rather use the phrase helpline, in North-America they prefer the word hotline. In both Europe and North-America the non-financial companies mainly use the word ethics and/ or integrity added to the whistleblowing system while in the financial sector it is so only in North-America but it is not typical in Europe. Only 8% of the non-financial companies employ ombudsman, it is more widespread in the financial sector

particularly in North-America. The phrase "whistleblowing" appeared only in Europe especially in the financial sector. Most of the companies (31%) make whistleblowing obligatory or strongly encourage (25%) if a person notices something illegal / unethical. Similarly 31% offer it as an option while 14% do not write about the level of obligation. Making whistleblowing obligatory is more widespread in the North-American companies (66%) than in the European ones (47%). 60% of the companies allow anonymous whistleblowing, 72% ensure protection against retaliation. Companies usually apply different means of communication in their whistleblowing systems. The vast majority of the companies draw their employees' attention to turn to their manager first (North-America 76%, Europe 57%).

According to the FTSE research concerning 100 companies the most frequent topics of the reports were bribery, corruption (83% of the companies), discrimination and harassment (83%), whistleblowing (83%), information protection (78%), environmental impact (76%), security of work and property (74%), supply chain/sources (72%), conflict of interest (70%), responsible marketing/commercial (52%), human rights (50%), wage policy (48%), balance of work and privacy (37%).(Webley et al., 2010). Based on an American survey the most frequent ethical misconducts in the corporate environment were the following: corrupt practice with company resource (23%), offensive behaviour (22%), deceiving employees (19%), misuse of e-mail or Internet (18%), conflict of interest (16%), discrimination (14%), deceiving external stakeholders (12%) (LRN, 2010).

According to a national business ethics survey in America while in 2009 more than half (55%) of the employees reported ethical misconducts, this rate changed to 41% in 2013. Female notifiers are more willing to report (66%) than men (60%) and there are more managers than employees among the reporting people. (Ethics Resource Center, 2009,; Ethics & Compliance Initiative, 2013). Those who notice something unethical usually turn to a person who they know and not to an impersonal reporting system. Most people (46%) noticing something unethical report it to their direct manager. 29% of them notify to higher management level, 15% to some other responsible people, 4% indicate that outside the company and only 3% turn to ethics hot lines. In large companies it means a high number of notifications, on average 431 per month, 20% of which the investigation proves ethical misconduct. 81% of the notifiers say that the ethics investigation was fair and it has increased their commitment to the company (Ethics Resource Center, 2010.) A more positive result can be seen in the KPMG Forensic (2013) survey concerning whistleblowing systems according to which although the majority (78%) of employees observing violation would notify their supervisor or another manager, but more 53%

would notify it by the ethics hotline and this tendency is increasing compared with the previous data (38% in 2005 and 44 % in 2009).

Despite the fact that companies emphasise that notifiers cannot experience any negative outcome, some of the reporting persons (21%) experienced different forms of retaliation. There is room for improvement in case of managers as well. Managers were responsible for a large share of workplace misconduct (60 %) and senior managers were more concerned than lower-level managers. (Ethics & Compliance Initiative, 2013). Whistleblowers play an essential role in detecting economic crimes. According to a global survey 5% of economic crimes were discovered by whistleblowing system and 18% of them by tip-offs (PWC, 2014). Similar results were found in the research conducted by KPMG, according to which 19% of the economic crimes were discovered through formal whistleblowing and 22% by informal tipp-offs.(KPMG, 2014).

In Hungary, the costs of economic crime and asset misappropriation are increasing, and bribery and corruption are the two most widely experienced types of economic crime. Economic crimes have huge financial impact, and the significant impact on employee morale as well. (PwC, 2014). In 2007 in the Ernst & Young survey in Hungary 20% of the respondents would not notify fraud or corruption, this rate is bigger than that is on average in Central and Eastern Europe (15%) and in Western Europe (8%). The main reason for not notifying is the fear of retaliation by the manager, the company (50%) or the colleagues (5%), another reason was that they do not find notification important (45%). There is great similarity between the Hungarian and foreign results in terms of choosing a notification channel. The majority of respondents would report ethical misconduct to their direct manager first (67%), 7% would report to a colleague, 3% would use the hot line (Ernst & Young, 2007). According to the Ernst & Young survey in 2011 altogether 11% of the Hungarian respondents apply the hot line. This rate represents 33% of the companies with code of ethics. Based on the research 36% of ethical misconducts within the companies were revealed due to notifications, 14% of the cases were uncovered by the internal audit and 43% of the respondents stated that there had been no ethical misconducts in their company. There were no any measures in 33% of the revealed ethical misconducts. The efficiency of whistleblowing systems depends on the culture and it is not sure that it can operate well in a culture where providing information about another person is considered to be negative (KPMG, 2014).

Research objective, questions and methodology

The objective of our revealing research was to find out how widespread the whistleblowing system is in the circle of the largest

Hungarian companies as well as the characteristics of the whistleblowing systems. The previous Hungarian researches did not definitely focus on this company sphere and they were not so complex therefore our research was supplementary.

The following research questions have been composed: Where can anyone turn in case of ethical/compliance misconduct within the company? Is there an ethics/compliance whistleblowing system at the company? What is the name of the ethics/compliance whistleblowing system? In what ways is it possible to make a notification? Is it obligatory for the employees to notify a misconduct? Is it possible to make ethics report anonymously? Is protection against retaliation ensured? How many ethics complaints are there per year? What are the topics of the notifications? What percentage of the ethics reports are investigated? What sanctions are applied in case of ethical/compliance misconduct?

In order to answer the research questions a questionnaire survey was conducted. When working out the questionnaire the findings of the previous global surveys were taken into consideration. The questionnaire was uploaded in an electronic form on the following page: <http://evasys.unimiskolc.hu/evasys/online/>. The testing process of the questionnaire and the arrangement of the survey were carried out by the business ethics and transparency workgroup of the Hungarian Business Leaders Forum.

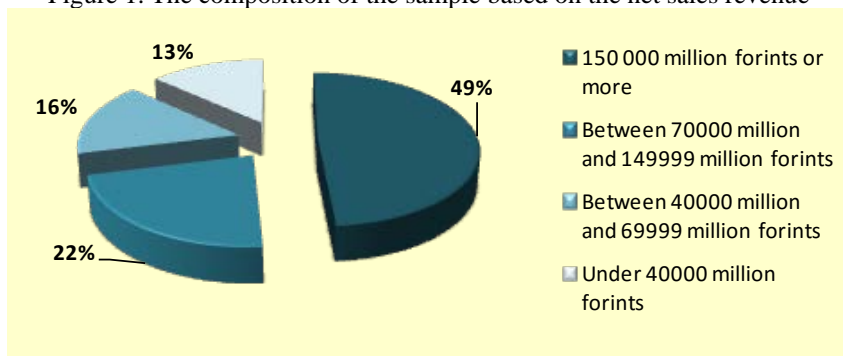
The Top 200 Hungarian companies with the largest net sales revenue were involved as population in the survey (Figyelő TOP 200, 2012). During the survey in order to ensure the representativeness of the samples from the large number of companies basically the criterion determining the size of the company was taken into consideration. The objective was to arrange the companies into homogeneous groups, strata based on their net sales revenue, statistical staff number, shareholder's equity and the profit after tax variables. The size of the sampling frame (200 companies) did not make it possible to apply these criteria as the number of the composed cross-class proved to be too many. Reducing the number of stratum forming criteria to the characteristics of the net sales revenue and the statistical staff number the number of cross-classes decreased to 16. We have the experience that even in this case there are such groups where a complete monitor would be necessary in order to provide analysable sample size or less reasonable and practical group concentration should be made.

According to our previous observation we had to consider that the number of those companies denying giving answers would be relatively high which would probably worsen the estimation results, furthermore the realized sample would not meet the representative requirements based on the expected variables. Therefore the net sales revenue remained the primary and only stratum forming criterion. As a matter of fact, based on the attempts

made in order to create a detailed plan in advance for sampling it has been found that it is possible to carry out a simple random sampling in all the four stratum on the basis of revenue.

23.5% of the questionnaires have been returned. The companies with higher revenue filled in the questionnaire on a much larger scale than the companies with lower revenue, in addition among the companies filling in the questionnaire the number of those not having a code of ethics was really small. In order to generalize the results we excluded the companies not having a code of ethics and applied the method of post-stratification. To make the results interpretable and to draw significant conclusions the method of reweighting has been applied. The data of the given sample has been completed with the weight system the results of which are in compliance with the results of a uniform (in this particular case proportionate) stratification probability sample, moreover it enables to create confidential intervals on the given assurance level. Through reweighting it was possible to reduce the bias of the estimations and further conclusions moreover it allowed to improve representativeness which led to increase reliability and accuracy. With applying weighting we could reduce sampling error. Reweighting made it possible to determine not only conclusions but data as well concerning the multiplicity (200 companies). According to the realized sample 49% of the assessed companies had 150,000 million forints or more net sales revenue, 42% had 2000 or more employees, 51% had 40 000 million forints or more shareholder’s equity, 43% were companies with 4000 million forints or more profit after tax. The composition of the realized sample can be seen in Figure 1.

Figure 1. The composition of the sample based on the net sales revenue



Source: Our data

During data processing the data from the Evasys system were processed with SPSS program and Excel. Among statistical analysis mainly the method of point estimation is applied further on, the questions in the questionnaire as well as the structure and the composition of possible answers made it reasonable. Our findings are solely valid for Hungarian

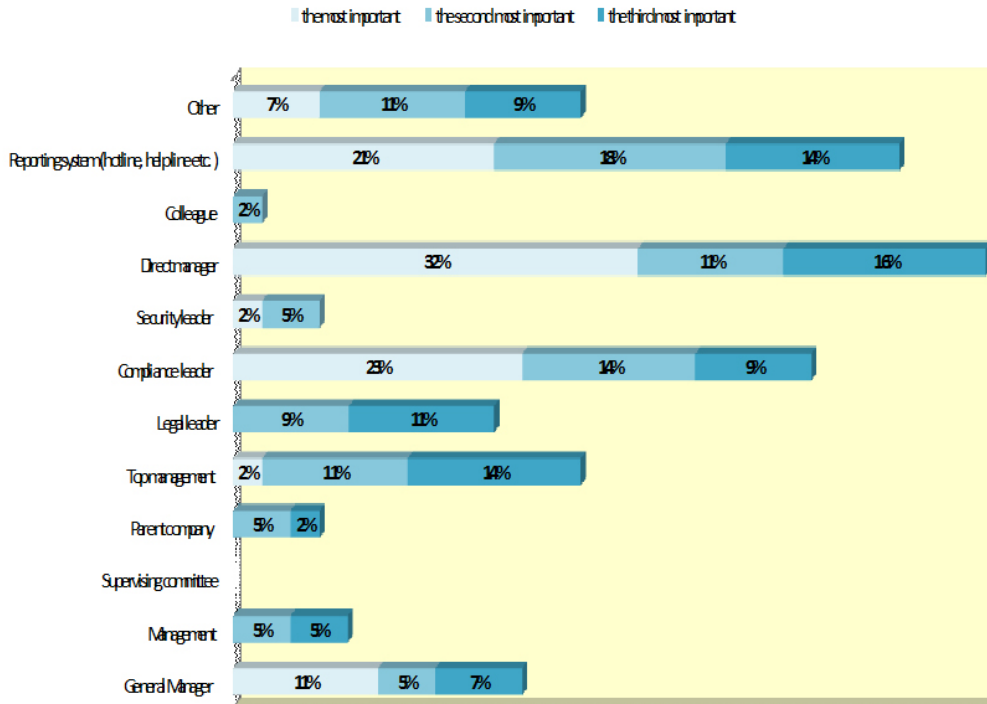
large companies with code of ethics but are supported statistically.

Results

In the majority of the Hungarian large companies with code of ethics it is possible to turn to the direct manager (59%), the company whistleblowing system can be found on the second place (53%), the compliance manager is on the third place (46%). In case of most companies the ethical misconducts can be reported to the higher level management (27%) and the executive (23%) as well (Figure 2).

The greater part of the companies with code of ethics (77%) has their own ethics (compliance) whistleblowing system. This rate is a little behind the global result of the 200 largest Hungarian companies (83%) (KPGM, 2008). The whistleblowing system was introduced in the majority of the Hungarian companies (37%) 5-9 years ago, 26% introduced it 2-4 years ago, 9% introduced it 10 years ago or earlier, 5% introduced it 0-1 year ago. In most cases (27%) the whistleblowing system is called hotline, but it is also called as reporting line (20%) and ethics/compliance line (20%) as well. The word helpline was used in 10%. Independently of the name in 97% of the surveyed companies it is also possible to ask for advice in case of ethical dilemmas.

Figure 2. The possible channels for making complaints



Source: Our data

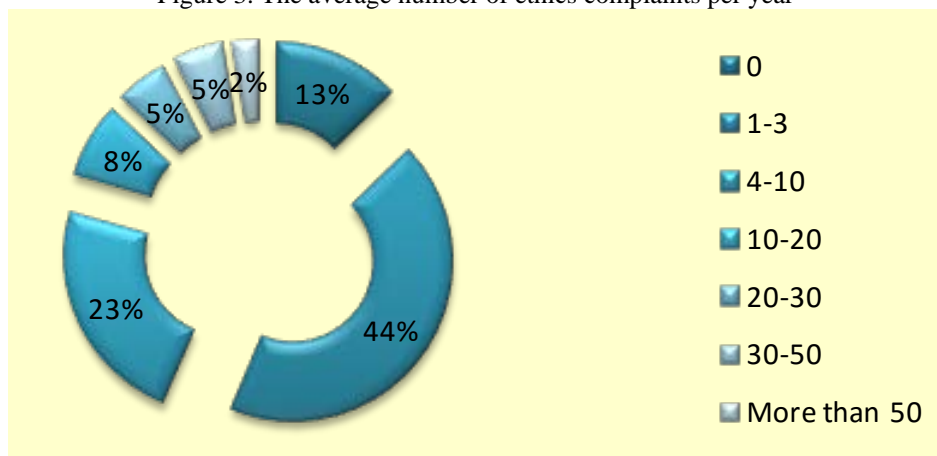
Concerning the way of ethics complaints most of the companies offer the chance to report in e-mail (68%), reporting on the phone is on the second place (50%), personal reporting is on the third place (38%). Making an ethics report is possible on the Internet only in 14% of the companies and in 10% through the Intranet as well.

It is obligatory to report ethical misconducts in the majority of the companies (85%) with code of ethics. However even more companies (94%) offer the chance to report anonymously. In a greater rate (98%) the protection against retaliation is ensured. In spite of the fact that the code of ethics of the Hungarian companies are not primarily for the external stakeholders, in 93% of the companies it is possible for external stakeholders as well to make notifications.

Considering the number of the ethics complaints in most companies (44%) 1-3 reports are made per year. In 23% this number is 4-10. In 8% of the companies this number is between 10 and 20, in 5-5% it is 20-30, while in 2% the number of ethics reports is above 50 (Figure 3).

Regarding the topics of the ethics complaints in most companies it is about conflict of interests (32%), using and misusing company assets (29%), discrimination (18%), gifts and entertainment (19%), bribery and corruption (16%) and harassment (14%). In 9% of the companies we can find the topic observation of fair competition and adherence to laws (Figure 4).

Figure 3. The average number of ethics complaints per year

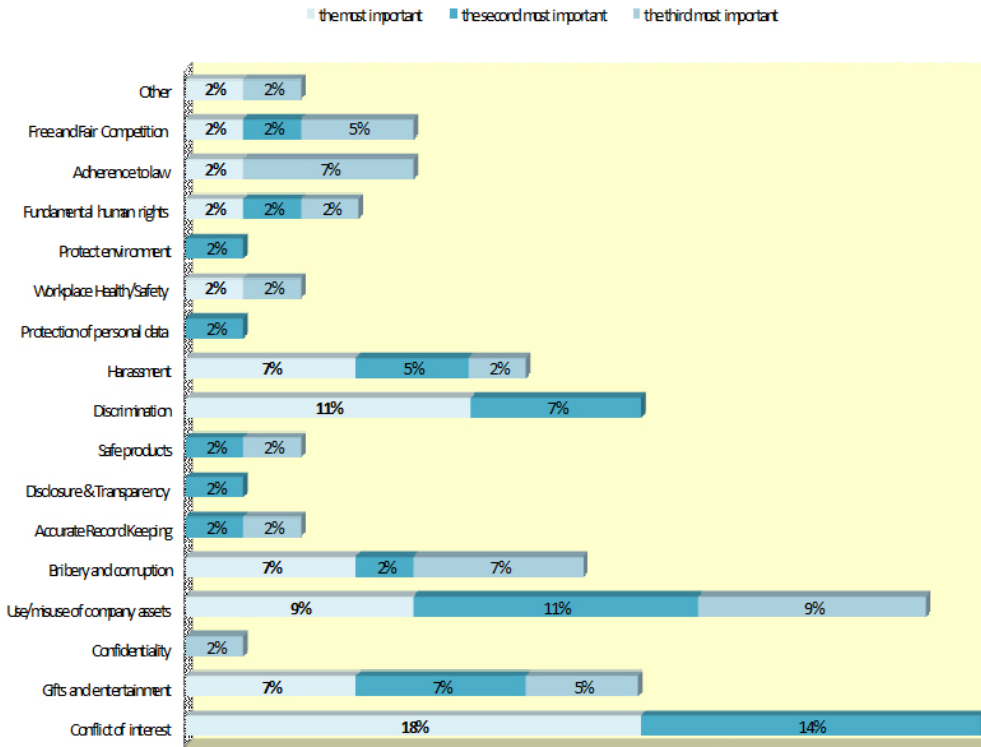


Source: Our data

These topics are mainly the same as the ones appear the most frequently in the Hungarian codes of ethics. Despite the frequency of the topics of using/misusing of company assets and harassment these topics appear merely in 70% of the codes. At the same time confidentiality which can be found in 93% of the codes it appeared only in a small rate of the ethics reports. Environment protection can be found in 2% of the ethics

notifications in Hungary. The majority of the Hungarian companies (78%) investigate all of the ethics reports. In case of 15% this rate is 81-99%.

Figure 4. The main topics of the ethics reports



Source: Our data

The majority of the companies with whistleblowing system (67%) have made a separate rule of procedure too but only 28% have a separate regulation for the sanctions. The ethical misconduct is sanctioned in all the companies with code. In most of the companies (66%) the sanction can be written warning, in 59% there can be dismissal, in 53% verbal warning. Verbal warning was named as the most frequent punishment it was followed by written warning and after that dismissal. Relocation to another department is also applied in a relatively small rate of the companies (12%), or paying a fine can also be experienced (9%). The respondents' opinions vary concerning the significance of stating an ethical misconduct. 46% said that it had a greater significance than a specific sanction.

Conclusion and discussion

Based on the previous global surveys those people who report an ethical misconduct usually turn to a person who they know first of all to their manager and not to an impersonal reporting system (e.g Ethics Resource

Center, 2010; Ernst &Young, 2007). Our survey shows that the Hungarian large companies with code of ethics offer the possibility to turn to the direct manager or to the compliance manager with complaints. On the other hand more than three-thirds of them have their own ethics and compliance whistleblowing system. This rate is a little behind the global results of the 200 largest companies (83%, KPMG, 2008), which can be considered as a good result. It is also very positive that in almost all of the companies there is a chance to ask for advice in case of ethical dilemmas. In most of the companies (75%) it is obligatory to report ethical misconducts and it is possible to do it anonymously (94%). These rates exceed the international rates (65%, 72%) too.

We evaluate as absolutely negative the fact that in most of the companies there are merely 1-3 reports per year but in a lot of companies there is not any. Considering that our statements are valid for the largest Hungarian companies with code of ethics the number of the ethics reports is really low. It indicates that even though there exist written ethics norms, there is no proper communication about them or those concerned do not have the trust that there might be an objective investigation, perhaps they are afraid that there would be retaliation after the report but another reason can be the judgement of the notifications from cultural point of view. It is also thought-provoking that only a small rate of the companies operates whistleblowing system on the Internet which is a basic communication tool nowadays.

The most common topics of the ethics reports is conflict of interests, using company assets and their misusing refer to the fact that the protection of the company assets appears in the code of ethics with great emphasis. The rate of ethics complaints concerning discrimination, harassment and corruption is much lower despite the fact that the latter one is usually a major topic in international surveys. It is similarly striking that in the Hungarian ethics reports the topic of environment protection is minimal (2%) while this rate is 76% in 350 companies of the FTSE (Webley et al., 2010). In our opinion the reason is that the environmental awareness of the Hungarian stakeholders is low which is also indicated by the fact that this topic also appears in the code of ethics in a lower rate.

Our survey pointed out that in the Hungarian large companies the codes of ethics rather serve as basic principles, the real practice of handling problem has not developed yet. The key of the development of ethics institutionalisation is communication. The communication about the significance of ethics norms and ethical behaviour can contribute to the development of the culture of ethics problem handling as well as to the increase of the ethical expectations by the internal and external stakeholders which can encourage the ethical behaviour of the companies. There is plenty

to do on international level as well concerning whistleblowing systems as the number of whistleblowing system reports continue to rise which is loading. The main challenges are to ensure accessibility, besides confidential and effective operation to maintain costs on the appropriate level, the protection of reporting persons and to focus on prevention (Martini – Chêne, 2014; Navex Global, 2015). The Hungarian large companies have to prepare for these challenges too.

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