

4th April 2006

Dr Anthony Marinac
The Secretary
Parliamentary Joint Committee on Corporations and Financial Services
Suite SG.64
Parliament House
CANBERRA ACT 2600

Dear Dr Marinac

RE: Inquiry into Corporate Responsibility and Triple Bottom Line

The Graduate school of Business at RMIT University welcomes the opportunity to submit a paper on issues of corporate responsibility and triple bottom line reporting in Australia, in response to the Parliamentary Joint Committee's inquiry into such matters.

The RMIT University has had a long and widely recognised commitment to practical and relevant education. Academics and researchers within the Graduate School have been at the forefront of business ethics, corporate responsibility and triple bottom line research investigating issues, trends and challenges of application. Importantly this has been achieved through engagement with Australian organisations in both the private and public sectors in addition to the development of international networks. Our commitment to business ethics, corporate responsibility and triple bottom line is evidenced by the number of courses offered by the Business Portfolio (Faculty) since the late 1980s and the Graduate School's major field of study in Governance and CSR as part of the MBA program. To our knowledge it is one of the few if not only MBA program in Australia to include such a major in what is still regarded as the premier post graduate program for managers and leaders.

The submission has been prepared based on the research and interaction with organisations and through associations with Australian and International professional bodies. I believe that the submission contains practical and relevant views which would contribute to the advancement of CSR and its necessary underpinning concept of ethical and responsible business practice.

We would welcome the opportunity to meet with the Committee to discuss any of our views in greater detail.

Yours sincerely

Professor John Toohey
Head
Graduate School of Business

Preamble

Various submissions to this Senate Committee have provided definitions and descriptions of Corporate Social Responsibility (CSR) and Triple Bottom Line (TBL) Reporting. Many have also identified the importance of establishing and maintaining a balance between an appropriate regulatory environment and the adoption of CSR and TBL as part of business strategy.

This brief does not propose to revisit such concepts in-depth as they have been effectively covered in other submissions, rather, it will:

- Provide background to the RMIT University's work in this field establishing the credentials for this submission; a position of expertise.
- Focus on the results of research undertaken by academic staff and consultants working in the fields of CSR, business ethics and governance.
- Identify the major problem in adoption of CSR and Integrity systems by Australian Organisations as business strategy
- Propose a solution that is designed to promote and educate business about the applied nature of CSR, TBL and Business Integrity systems.

1.0 Introduction

The Joint Parliamentary Committee is examining the specific concept of Corporate Social Responsibility and Triple Bottom Line; however, this submission has expanded the concepts to include Governance, and Business Ethics initiatives that we refer to as Integrity Systems. It does so for very important reasons that are linked to the research conducted by RMIT academic staff. This research provides insight into what accounts for the inconsistent application and effectiveness of CSR, TBL and Integrity Systems strategies in the Australian business environment.

Corporate Social Responsibility and TBL are typically seen as separate to business ethics and corporate governance. In fact they are part of the same concept. CSR tends to focus on displaying an acceptable external organisational face to the community. It generally refers to the organisation demonstrating citizenship and responsible practices, usually limited to issues pertaining to organisational donations, sponsorships and ecological or environmental issues. These are usually evidenced through statements in annual reports and occasionally through systems such triple bottom line reporting.

This external focus must be seen as only part of the equation. Organisation need recognise that executive and employee ethical behaviour is the basis of action that is seen as socially responsible. Organisations that have a CSR face yet have unethical internal practices experience cultural clashes. Ultimately, as evidenced by organisations such as Enron, WorldCom, HIH, Onetel and most recently AWB, such behaviours do become public causing extreme damage to corporate reputation- undermining the very objective of CSR, and in some cases causing the company to collapse resulting in significant damage to national economies. It is our contention that CSR initiatives without corresponding internal Integrity strategies based on an ethical culture with sound governance systems creates justifiable cynicism and does not lead to effective business strategies.

2.0 Background: The RMIT University and CSR, TBL, Business Ethics, and Governance.

The RMIT University's Business Portfolio has been one of the leaders in applied Business Ethics and CSR or integrity systems research and teaching.

2.1 The RMIT and CSR & Business Ethics Teaching

It was one of the first Universities in Australia to introduce courses in ethics, CSR and governance in its Business Degrees and Post Graduate programs.

- Two elective courses in business ethics were established in the Business Administration degree in 1990 and are still running today. The Bachelor of Business Management, as of 2005, introduced a compulsory course in ethics and governance.
- The School of Accounting and Law has had a compulsory course in Accounting Ethics and Professionalism since 1993.
- The School of Marketing has had an elective in marketing ethics at the undergraduate level since 1995.
- The School of Marketing also established a post graduate elective in marketing ethics in 1995.
- The Graduate School of Business is one of the few majors in applied business ethics and governance with 4 structured courses in the MBA – still the most recognised postgraduate qualification for managers and business leaders.
- The University established a Masters in Corporate Governance and later a Masters in Risk and Assurance.
- The Business Portfolio (Faculty) has as one of its key themes for all its programs and courses, responsible business practice and sustainability.

2.2 The RMIT, Professional Groups and International Links

Academic Staff within the Portfolio and the GSB are active researchers and

consultants in the field of Applied Business Ethics and CSR and are members of key associations including: Australian Association of Professional and Applied Ethics, European Business Ethics Network and the International Society for Business, Economics and Ethics. Staff have also been active in academic and business conferences both in Australia and overseas developing strong international networks for the University. This has provided the opportunity to incorporate international trends in CSR, TBL, ethics and governance in undergraduate and postgraduate courses.

2.3 The RMIT, CSR and Business Ethics Research

Academic staff teaching and researching in this area are not only active in professional associations and international networks, but many have pursued PhDs and Professional Doctorates in the field of organisational ethics, ethical decision making, corporate social reporting and sustainability.

Academic staff have also assisted the business community through consulting activities and through formal associations with major consulting firms such as KPMG.

2.4 RMIT and CSR & Business Ethics: A Community of Practice

The Graduate School of Business also has introduced the concept of Communities of Practice- a standing committee made up of representatives from major Australian organisations, as a means of facilitating the business-academia relationship. A specific community focusing on CSR and Governance has been formed with membership from key Australian organisations including Boeing Australia, Australian Bankers Association, Telstra and the ANZ Bank. The Community also includes researchers and business ethics practitioners from other Universities and major consulting firms to foster a collegiate approach to CSR, ethics and governance.

This Community of Practice has been established to provide a forum for business and academia to interact and to share information and to focus on applied research

opportunities in the CSR, ethics and governance arena. The information provided in this brief is based on the collected research and experience of these staff and the Community of Practice.

3.0 Businesses and CSR: The Australian Experience.

3.1 The CEO and Success of CSR and Integrity

Our experience has shown that the initial and sustained success of CSR and Integrity strategies rests predominately with the CEO and Senior Executives of an organisation, be they private or public sector. Numerous researchers have identified the significant role played by senior executives in establishing organisational culture. The CSR and Business ethics literature reinforces this relationship. Newton (1995) has gone further suggesting that CEOs are also responsible for the failure of such initiatives when;

- The strategies are established without sufficient knowledge of CSR, ethics and integrity;
- When it is conceived as an employee control mechanism rather than a cultural strategy; and lastly
- When behaviour of executives is inconsistent with stated values.

These three principles reinforce the emerging themes of lack of understanding, lack of role modelling and a narrow interpretation of CSR and integrity systems.

Whilst ethical leadership is an emerging area in business ethics literature and some aspects of ethical leadership are addressed within the popular concepts of Emotional Intelligence, generally speaking, it is not a key feature of leadership dialogue. This may give some insight as to why business leaders do not seem to address CSR and Integrity in the same way as financial issues, marketing etc.

As evidenced by our research many executives are confused about notions of values and ethics and their role within organisation. Some executives believe that

the mere existence of published organisational documents dealing with values, ethics or CSR will somehow transform individual behaviours. Others seemed confused as to the relationship between values, ethics and organisational culture.

Interviews with numerous CEOs and evidence from consulting activities suggest that many executives approach CSR and Ethics from a reactive rather than a proactive response. Five positions clearly emerge:

- a) Executives see CSR, Integrity, and Ethics initiatives as expensive “window dressing” that are not required by their organisations, as they have no real ethical concerns.
- b) Executives see CSR, Integrity, and Ethics initiatives as having little bottom line value (this is despite evidence to the contrary).
- c) Executives usually initiate CSR, Integrity, and Ethics strategies in the wake of major scandals or crises. Mostly such implementations are organised quickly and are often incomplete, unsupported by internal strategies and are undertaken to be seen as an organisational response to the crisis.
- d) CSR, Integrity, and Ethics initiatives are seen as “one-offs”. In other words only an initial effort is required.
- e) CSR, Integrity, and Ethics initiatives are introduced purely because of regulatory or listing requirements. This approach is also referred to as compliance or a tick the box mentality. This typically leads to organisations seeking “off-the-shelf” solutions either introducing existing industry codes or strategies which are usually inappropriate for their organisations or employing an external group to draft a CSR or Ethics strategy for immediate implementation. Simon Longstaff, CEO of the St James Ethics Centre has identified the ineffectiveness of such strategies.

3.2 Understanding CSR, Ethics and Integrity.

As suggested above, organisational leaders seem to have a variety of views as to what CSR, Ethics and Integrity actually mean and whether stated organisational values are able to influence individual values.

CSR is typically seen as an external concept to demonstrate to the public that the business was/is a good corporate citizen. Such strategies are being increasingly seen as a way to generating customer loyalty and attracting future staff to an organisation. This again reinforces the perception of CSR as an external face rather than an holistic business strategy.

Very few organisations seem to understand the link between CSR as an external strategy and the need to establish an internal ethical culture through integrity mechanisms such as corporate governance systems, and behavioural mechanisms such as codes of ethics, codes of conduct and whistleblower systems and reporting lines and effective fraud and corruption controls.

RMIT researchers have identified that whilst organisations had some of these strategies they were often incomplete systems and many lacked integration, i.e. the Fraud and Corruption area, typically referred to as risk management, was often isolated from other strategies such as integrity or remuneration. The 2005 KPMG survey of fraud and corruption in Australia identified that the absence of such effect and integrated strategies increases the opportunity for unethical practice to occur. Research conducted by RMIT staff has also identified that often these separate strategies were administered by separate sections of the business adding to the lack of integration.

This uncertainty or lack of understanding about the role that culture and systems have on behaviour often translates to ineffective cultural strategies designed to support CSR initiatives.

3.3 Values and Codes

A positive development in the Australian setting is that many organisations have embraced the need to have codes of ethics and/or conduct. However, few organisations have developed effective codes targeted to their particular business environment, both internal and external.

Research suggests that many organisations use the terms codes of practice/ethics/conduct synonymously. There are distinct differences between these policy documents and their application. This highlights a lack of understanding on the part of most organisations and those responsible for their development (Segon, 2006).

Some organisations had documents that they referred to as values or principles- yet upon examination were in fact compliance codes, some referred to codes of conduct that were in fact value statements with little specific guidance on behaviour (Segon, 2006). This demonstrates a lack of understanding as to the distinction between these documents and how they separately affect and guide decision-making within organisations.

More developed written statements /codes seem to exist in the public sector. This is consistent with findings of organisations that participated in a 1998 survey of Australian adoption of codes. 68% of the sample were public/government organisations and 49% of these had such documents; however, Australian stock exchange listed companies were least likely to have codes. Only 23% of unlisted private enterprises were included in the group and only 9% of these had codes (Farrell, 1997).

Few organisations appeared to have comprehensive documents that linked the values of the organisation to formal codes and to external strategies such as CSR and TBL.

The 1998 research referred to above showed that of the organisations surveyed

that had formal codes or values statements, 83% were directed at managers and employees whilst over 60% of the codes were rules based format, possibly suggesting a code of conduct rather than a code of ethics. This is further supported by the fact that 83% of the codes did not state aims and 74% contained no objectives (Farrell, 1997).

Another interesting trend in the area of written codes is the exclusive use of "I" language. This means that organisations write or adopt codes that direct or control employee behaviour through such statements, as "I shall, I shall not... I will...." This tends to emphasise integrity as solely individualistic rather than an organisational duty, yet CSR is clearly an organisational issue (Segon, 2005).

3.3 Understanding Culture

An emerging trend larger business has been the use of CSR as a public relations strategies so as to attract highly qualified and secondly as an employee retention strategy. Whilst this has some merit, as other factors in this submission demonstrate, the critical internal policies and procedures designed to foster an ethical culture- the integrity system, is poorly applied and incomplete in most businesses.

Only a handful of organisations undertake cultural surveys to determine critical issues facing the organisation. Research has demonstrated that organisations seem reluctant to undertake this type of analysis (Segon 2005).

Research demonstrates that the establishment of an effective integrity/ethics system is enhanced when informed by such audits both before the process and during as a means of evaluation (Segon and Kimber, 2005).

Importantly most organisations recognised the importance of role modelling, in particular from CEOs and Senior Executives as a clear indicator of acceptable and unacceptable behaviour.

3.4 Training and development

Generally there is little evidence of ongoing training in the area of integrity or ethical decision-making. This is consistent with research and in particular the 1998 survey findings that of the organisations surveyed, 82% expressed a strong view that employees should receive training in ethics and 72% indicated there should be training conducted by the organisation and that all employees should be trained. However, only 18% of surveyed organisations conducted specific seminars on ethics, 25% held training sessions other than by seminar and 37%

integrated ethics training into other programmes (Farrell, 1997). Research has shown that when this occurs, ethics becomes marginalised (Segon, 2005)

This tends to suggest that organisations agree in principle that ethics and ethical decision-making should be part of organisational training, but few organisations actually provide such training on an ongoing basis.

3.5 Internal Support Mechanisms.

CSR Initiative and internal cultural strategies intended to promote ethical behaviour require changes to structure and systems to support these initiatives. These include:

- The creation of designated position or managers responsible for CSR, ethics and integrity and to provide the organisation with a TBL type report;
- Effective communication strategies to advise on company policies and expected standards;

- The establishment of reporting systems design to promote internal rather than public whistle blowing so that potential problems can be addressed before mistakes are made;
- An independent office or position where resolution of internal and external disputes can be addressed.

Research by RMIT staff demonstrates that most organisations recognised the importance of a formal reporting mechanism but felt that the cultural difficulties associated with “dobbing in a mate” prevented them from being effective.

Most organisations consequently tend to use existing reporting lines such as line relationships, supervisors, managers and senior managers, through to HR and/or Executives. Research shows this as a less effective method due to the power relationships between manager and subordinates and the reluctance of subordinates to report “bad news” to superiors.

Few organisations seem to have actually established CSR integrity/ethics offices to deal with such matters. This is consistent with the 1998 survey findings that only 15% of respondents had appointed a specific officer for ethical matters, whilst 19% of enterprises had procedures in place to assist staff to resolve ethical dilemmas confronted in the workplace (Ferrell 1997).

3.6 Integrated Systems

Few organisations demonstrated an understanding of the relationship between CSR, ethics and integrity systems and other organisational policies and systems such as performance management, remuneration, fraud and corruption etc (Segon, 2005).

Whilst it is positive that organisations at least had some of these policies, they were not necessarily integrated. The consequence is that some approaches, eg performance management or remuneration may in fact undermine cultural

strategies to reduce corruption or improve ethical standards and promote CSR activities.

3.7 Responsibility for CSR & Integrity

By far the most common organisational area delegated responsibility for integrity/ethics appears to be Human Resources, typically a sole HR manager. Reporting on CSR performance is often seen as an audit or finance function, thus reinforcing the lack of integration finding referred to earlier. It is also interesting to note that professional programs and formal education in these fields rarely include CSR, Business ethics and governance as critical fields of study.

4.0 Why Do Organisation Fail to Develop Effective CSR and Ethical Cultures?

Recent research undertaken through RMIT Academic staff and KMPG Australia suggests that many organisations have ineffective or non-existent CSR and Integrity programs. The problem stems from the absence of a strategic approach to the creation and maintenance of an effective integrity system. Companies devote substantive resources to marketing, advertising campaigns or the upgrading of IT because they believe that they will see immediate results, however, when it comes to CSR, ethics and integrity, many organisations treat this as a one-off expense with few support mechanisms, yet are puzzled at the subsequent ineffectiveness of these programs.

By far the most confusing aspect for most organisations is the type and extent of the ethical system and the support required for broader CSR strategies. The reality is that the appropriate system depends on the nature of the organisation, i.e. its size, structure, industry etc Organisations need to design ethics systems to fit their structure (Segon, 2006).

We can identify many reasons why attempts to develop ethical culture proves ineffective in addition to the failure of ethical leadership referred to above.

Perhaps one of the main reasons for ineffective strategies is that the task is often delegated to individuals who are not knowledgeable in the area of CSR and ethics and integrity systems (Segon, 2005)

Business ethics involves specialist knowledge in various disciplines including philosophy, organisational behaviour and organisational structure and design. This expertise is not common within organisations and often mistakes in the design, implementation and support of ethical programmes are made through ignorance rather than intent.

It is important to recognise that the "professionalisation" of management, human resources, marketing etc, is evidenced in the business community by the growing requirement for managers to have appropriate undergraduate degree and increasingly post graduate qualifications. As identified earlier in this submission, research undertaken by RMIT academics has demonstrated that responsibility for the development of corporate responsibility and ethics systems seems to be most often delegated to human resource managers and occasionally to managers with public relations backgrounds.

Anecdotal evidence suggests that many of these individuals do not have formal training or education in the fields of philosophy, business ethics or CSR. Literature on professionalism would suggest that it is folly for a professional body to allow or advocate that its members practice in areas where they lack knowledge or qualifications. Yet in many respects the evidence suggests that is what is occurring in most organisations that pursue CSR, Ethics, and Integrity strategies.

A brief review of a range of postgraduate business courses offered in Australian universities, such as MBA programmes and Masters in Human Resources, Public Relations etc, reveals that the majority of these lack compulsory or elective courses in corporate responsibility, business ethics and TBL. They do have extensive courses

in management, marketing, human resources, accounting etc.

One must ask how managers and business leaders can be expected to develop and implement corporate responsibility and integrity systems if these are not addressed with the same level of importance as traditional business and management areas by business schools.

5.0 An Institute to promote CSR and Ethics Systems

In order to facilitate meaningful adoption of the principles of CSR and the internal integrity systems strategies designed to support them, a change needs to occur at senior executive level through greater awareness of the benefits of CSR and Integrity Systems, and through an availability of appropriately qualified professionals who can manage such initiatives from a position of recognised knowledge and expertise. Such a change will not occur in the short term without a specific and sustained effort to raise the profile of CSR, Business Ethics and Integrity, and through the incorporation of this subject matter into formal and professional education and training. This is seen as in addition to an appropriate regulatory environment.

It is suggested that an Institute for CSR & Business Ethics, attached to reputable tertiary institution be established. Whilst several centres for ethics exist in Australia, typically based at universities or as private consulting firms, few of these actually focus on appropriate CSR and business ethics strategies or have the experience and research base in applied ethics. What is required is a body that can bring together the emerging research literature in CSR, TBL, Business Ethics and members of the business community in a manner that is of practical benefit to organisations in both the private and public sectors.

Using best practice models, as evidenced by international centres such as the Center for Business Ethics at Bentley college in Massachusetts, the Markkula Center for Applied Ethics at Santa Clara University, The Copenhagen Centre, AccountAbility in the UK, what is required is an Institute that can provide a forum for business leaders, with the ability to provide executive education programs and formal qualifications in the fields of CSR, Business Ethics, and Integrity.

The proposed Institute would need to have links to key CSR and Business Ethics centres around the world:

- a) So that trends and developments occurring internationally can be conveyed to Australian business in a timely fashion, and

- b) So that international scholars, researchers and consultant's can visit the Australian Institute and participate directly in executive training and formal qualifications.

Any Institute needs to be focused on the needs of business and staffed by people with a background in both business and CSR & Business Ethics.

Many of the current Australian centres that purport to cover these fields either do not have such holistic approaches, or are based in non-business areas such as philosophy and law. Whilst these disciplines are integral to CSR & Business Ethics, such an institute ***needs to be directly linked to those areas which actually provide business education to managers and leaders, namely a Graduate Business School, and to the courses that are recognised as being appropriate for leaders and manages, namely DBAs, MBAs and specialist Masters Programs.***

A recent survey of MBA students indicated a reluctance to study courses in CSR and Business Ethics. Some of the reasons cited included a belief that their organisations and business leaders would not value such studies. This again suggests that attitudinal changes on the part of executives and organisations are required.

An appropriately funded Institute could address these issues by:

- Offering full or part scholarships to prospective students who choose a CSR-Business Ethics stream in an MBA program, who have their organisation's endorsement.
- Provide subsidised CEO and Executive briefing session's featuring recognised international speakers around strategic CSR and Business Ethics issues.
- Provide short courses to industry on key CSR features and implementation issues.

- Provide a clearinghouse and industry database enabling organisations to determine their legal requirements under various federal and state government legislations.
- The establishment of an accreditation system whereby the Institute can award organisations levels of certification depending on the extent to which they meet standards relating to CSR, TBL and internal Integrity systems.
- Provide a bi-annual congress for the Asia Pacific on CSR and Applied Business Ethics.

5.1 The Role of Governments

Governments have the ability to directly compel organisations to adopt CSR and TBL practices through legislative requirements. Whilst such strategies are necessary at a basic level, a minimalist compliance culture tends to emerge when these legislative options are seen as the only mechanism by which to foster CSR and Ethics and Integrity. Research has demonstrated that when such strategies are adopted the letter of the law rather than the spirit of the law is favoured. In addition further regulation is usually accompanied by criticism from business sectors.

In addition unless Governments are willing to enforce the regulations they quickly become seen as tokenism. This has been the experience of RMIT researchers particularly with the regulations as the Criminal Code (Bribery of Foreign Public Officials) Bill 1999. Many managers either did not know of the legislation and its implications, or were unconvinced that anyone would ever be charged under these provisions thus effectively negating its impact. The recent AWB experience would seem to be consistent with both these perceptions.

As evidenced by the organisational culture and leadership literature, governments can enhance and encourage CSR and ethical practice through role modelling.

This can be achieved directly at two levels-

- a) Australian governments could require companies applying for government tenders either to be accredited by the CSR and Business Ethics Institute, or develop a set of criteria for tenders, which favour organisations that have such accreditation.

- b) Similar to the role of leaders in organisations, governments and members of parliament can play an important role modelling function. Raising ethical standards through the adoption of an appropriate code of ethics and establishing mechanisms for the reduction in perceived conflicts of interests would be seen as an advantage. The Canadian Parliament has established a formal body with this in mind. The Office of the Ethics Commissioner was created in 2004 as a result of amendments to the Parliament of Canada Act. It is suggested that the Federal Government could examine a similar approach.

6.0 Conclusion

The design of an effective CSR and Integrity system requires a breadth of expert knowledge in key areas of; organisational theory (organisational structure and design) organisational culture, behaviour, organisational development, including change management strategies and critically, business ethics.

Organisations need to recognise that the development of an ethical culture to support CSR initiatives, does not occur by chance, nor is it a matter solely of individual integrity. Like any other business plan, resources must be allocated, appropriate systems must be designed and implemented, behavioural changes encouraged and rewarded. These are an expense and businesses need to recognise that the benefit will come from a more ethical and cohesive workforce, lower turnover rates and higher productivity, reduced risk and enhanced reputation. Importantly authorities administering legislation need to consider whether organisations have not only

complied with the letter of the law, but also with the spirit of the law.

It is the view of these RMIT authors, based on the university's extensive applied business ethics experience and the research of its staff, that greater awareness of these issues needs to be fostered within the Australian business community. Attitudinal change at executive level followed by cultural change within organisations is the most effective way of embracing and sustaining Corporate Social Responsibility. This can best be achieved by providing the Australian business community with a facility which brings together experts, researchers and practitioners and provides the opportunity for individuals to acquire the knowledge required to develop and implement these strategies.

Indicative References

- Badaracco, J 1997, *Defining moments: when managers must choose between right and right*, Harvard Business School Press, Boston.
- Buchholz, RA & Rosenthal, SB 2002 'Social responsibility and business ethics', in RE Frederick, (ed), *A companion to business ethics*, Blackwell Publishing, Oxford, pp. 303-321.
- Carmichael, S & Drummond, JD 1989, *Good business: a guide to corporate responsibility and business ethics*, Business Books, London.
- Farrell, BJ 1997, 'Investigation and evaluation of codes of ethics in Australian enterprises and professions and in the international accounting profession' PhD thesis, University of Technology, Sydney.
- Francis, R 2000, *Ethics and corporate [REDACTED] Australia*, Law Book Company, Sydney.
- KPMG 1999, *Fraud Survey*, KPMG, Melbourne.
- McEwan, T 2001, *Managing values and beliefs in organisations*, Financial Times, London.
- Newton, LH 1995, 'The many faces of the corporate code', in MW Hoffman & RE Frederick (eds), *Business Ethics: readings and cases in corporate morality*, 3rd edn, McGraw Hill, New York, pp585-589.
- McDonald, G 1999, 'Business ethics: practical proposals for organizations', *Journal of Business Ethics*, vol. 19, no. 2, pp. 169-185.
- Segon, M 2005 'Australian Business and its approach to Integrity' Presentation to Austrian Institute of Company Directors, Sydney.
- Segon, M 2006, *Institutionalising Ethical Cultures: An Investigation of Formal Organisational Approaches*, PhD thesis, Queensland University of Technology, Brisbane.
- Segon, M & Kimber, D 2005, 'Integrated governance: linking up government, business and civil society' Annual Conference Organised by Monash Governance Research Unit, Prato, Italy, 26-29 October 2005
- Sims, R & Brinkmann, J 2002, 'Leaders as role models: the case of John Gutfreund at Salomon Brothers' *Journal of Business Ethics*, vol. 35, no. 4, pp. 327-339.
- Stanwick, P & Stanwick, S 1998, 'The relationship between corporate social performance and organisational size, financial performance and environmental

performance: an empirical examination', *Journal of Business Ethics*, vol. 17, no. 2, pp. 195-205.

Trevino, LK, Weaver, G., Gibson, G. & Ley Toffler, B. 1999, 'Managing ethics and legal compliance: what works and what hurts', *The California Management Review*, vol. 41, no. 2, pp. 131-151.

Verschoor, C 1999, 'Corporate performance is closely linked to a strong ethical commitment', *Business and Society Review*, Winter, pp. 407-415

Weaver, GR 1999, 'Ethics through corporate strategy', *International Journal of Organizational Analysis*, vol. 7, no. 1, pp. 96-98.