



**BUSINESS**at**OECD**

Business and Industry Advisory  
Committee to the OECD.

# **Talk Integrity: How Corporate Communication Drives the Fight Against Corruption**

Sharing Best Practices to Inspire  
Corporate Integrity Communication

Policy Paper  
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# Foreword

As the *Business at OECD Integrity & Anti-Corruption Committee*, we carry a specific **responsibility** towards the private sector, institutions and societies in a context where corruption distorts democracy and the rule of law, while **integrity sustains trust in markets and fair competition**. This mandate drives our continuous assessment of the evolving business context, drawing on the experience of our network, which represents more than 10 million companies across more than 50 countries. Such a collective vantage point enables us to identify the **critical dynamics that shape integrity and anti-corruption risks** in practice.

From this perspective, **corporate communication on integrity** stands out as a **strategic asset** that requires deliberate upgrading. In today's complex and digitalised business environments, operating under growing public and regulatory pressure, the way companies communicate about integrity directly influences corporate agendas, understanding and behaviour across organisations and their value chains.

This elevates the role of communication to an operational priority, requiring systems that make integrity expectations intelligible and actionable for employees, managers and business partners throughout the supply chain.

This policy paper sets out to systematise emerging corporate practices that treat integrity communication as part of governance architecture. It moves beyond generic awareness-raising to document how companies design communication systems that are embedded in leadership behaviour, organisational processes and operational decision points.

A further ambition of this paper is to support small and medium-sized enterprises (SMEs) in developing effective communication programmes. By drawing on the experience of larger organisations and on use cases that are scalable and adaptable, the paper seeks to make integrity communication approaches

accessible beyond large corporate structures. This enables other stakeholders across value chains to adopt and adapt proven practices, contributing to the wider diffusion of integrity, transparency and sustainability values throughout supply chains and business ecosystems.

This paper is intended as a practical reference for companies and their partners to design unconventional integrity communication that is credible, operational and scalable across value chains, advancing a more responsible and less complex business ecosystem in line with the [Zero Corruption Manifesto](#) and the eleven priorities of the [Business at OECD Integrity & Anti-Corruption Committee](#).

## Nicola Allocca

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# Introduction

Effective corporate communication plays a vital role in promoting business integrity across the board. Clear and consistent communication within companies helps establish and reinforce ethical standards and emphasis on integrity and compliance in the business environment.

Internal communication efforts that actively promote integrity and anti-corruption principles can foster a culture of accountability, while external messaging enhances stakeholder trust and supports collaborative efforts to combat corrupt practices.

The significance of corporate communication in advancing integrity is increasingly recognised in international frameworks and business commitments. For example, both Annex 2 of the 2021 OECD Anti-Bribery Recommendation and article 12 of the United Nations Convention against Corruption emphasise the importance for the private sector to use appropriate communication actions to promote business integrity. The *Business at OECD* Integrity and Anti-Corruption Committee underscored this imperative in its Zero Corruption Manifesto launched in November 2022. Principle 4, *Stimulate Responsible Business Conduct*, stresses the need to cultivate a culture of integrity through ongoing awareness, dialogue, and communication efforts, both internally and across supply chains.

The purpose of this policy paper is to provide leading practices on corporate communication campaigns in favor of business integrity. The paper is divided into two main parts:

**Part I** provides background on why companies are increasingly using communication as a tool to combat corruption. **Chapter 1.1.** covers the contemporary importance of communication in the fight against corruption. **Chapter 1.2.** covers the business case today for internal and external communication campaigns to advance business integrity. It also examines the opportunities, challenges and limitations inherent in using communications as a tool to pursue this goal.

**Part II** outlines the best practices in communications that are derived from specific use cases received from members of the *Business at OECD* global network, as well as contributions from members of its Integrity and Anti-Corruption Committee. **Chapter 2.1.** offers a typology of the different communications companies can utilise to advance business integrity. Based on the use cases received, **Chapter 2.2.** features a compendium for companies with all the communication solutions distinguished by their maturity level.

In this paper we treat communication not only as messaging but also as **choice architecture**: the cues, prompts, and conversation rituals that shape everyday judgments.<sup>12</sup>

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<sup>1</sup> Harvard discussion on choice architecture and salience: <http://nrs.harvard.edu/urn-3:HUL.InstRepos:27419676>;

<sup>2</sup> Richard H. Thaler & Cass R. Sunstein, *Nudge - How to initiate wise decisions*. (Richard H. Thaler, Nobel Prize in Economic Sciences, 2017.)

# Part I: State of play - The growing importance of communication as a tool against corruption

## 1.1. The importance of communication to promote business integrity and combat corruption

### 1.1.1. Corruption is a pervasive challenge with significant costs

Corruption remains a deeply entrenched global issue, with far-reaching economic and social consequences. According to the 2024 Corruption Perceptions Index (CPI) published by Transparency International, more than two-thirds of the 180 countries assessed are scoring below average when it comes to their corruption levels.<sup>3</sup>

The financial toll of corruption on businesses is considerable. Globally, companies lose on average approximately 5% of their annual revenue to fraud.<sup>4</sup> For medium-sized enterprises specifically, compliance budgets vary widely, with around 25% of firms allocating between \$1 million and \$5 million annually to such efforts. These investments underscore the financial burden that corruption prevention imposes across the business spectrum.

Beyond direct financial costs, corruption exacts a significant non-financial toll. Companies face reputational damage, loss of

business opportunities, internal disruption, and indirect costs related to compliance, investigations, and missed investments. The risks can be broadly categorised as:

- **legal risks** stemming from potential sanctions and prosecutions;
- **commercial** and **operational risks** impacting daily business activities such as procurement, production, and sales;
- and **reputational risks**, which often lead to decreased sales and diminished attractiveness to investors.<sup>5</sup>

Beyond its impact on businesses, corruption is an insidious practice that has a wide range of corrosive effects on the entire society. It undermines democracy and the rule of law, leads to violations of human rights, suppresses opportunities for development, and traps people in cycles of inequality and poverty<sup>6</sup>.

These multifaceted risks illustrate the complexity and seriousness of corruption's impact on business integrity.

In this context, communication campaigns emerge as a cost-effective complement to anti-corruption measures. While comprehensive compliance programs often

<sup>3</sup> 2024 Corruption Perceptions Index, Transparency International. [Corruption Perceptions Index 2024 - Transparency.org](https://www.transparency.org/en/cpi/2024)

<sup>4</sup> Occupational Fraud 2024: A Report to the Nations, Association of Certified Fraud Examiners. [2024-report-to-the-nations.pdf](https://www.aecfe.com/2024-report-to-the-nations.pdf)

<sup>5</sup> An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide, United Nations Office on Drugs and Crime. [An Anti-](https://www.unodc.org/unodc/en/anti-corruption/ethics-and-compliance-programme-for-business.html)

[Corruption Ethics and Compliance Programme for Business: A Practical Guide](https://www.unodc.org/unodc/en/anti-corruption/ethics-and-compliance-programme-for-business.html)

<sup>6</sup> Statement by the UNODC Executive Director, Ghada Waly, on International Anti-Corruption Day 9 December 2022, <https://www.unis.unvienna.org/unis/en/pressrels/2022/uniscp1153.html>

require significant resources, targeted communication initiatives (both internal and external) can reinforce ethical standards, raise awareness, and mobilize stakeholders around a company's integrity commitments at relatively low cost.

### 1.1.2. The growing importance of communication in the digital era

In recent decades, communication campaigns have become even more critical due to the rise of social media and the increasing reputational value placed on corporate responsibility. Stakeholders (from customers and investors to regulators and civil society) now demand greater transparency and accountability regarding business integrity. Corporate reputation, recognised as one of a company's most valuable intangible assets, is increasingly shaped by information accessible online.

Today, companies rely heavily on digital platforms for communication, both with employees internally and with stakeholders externally. The OECD Survey on Drivers and Models of Corporate Anti-Corruption Compliance revealed that half of surveyed companies with anti-corruption policies publish these documents on publicly accessible websites, signaling a commitment to openness and accountability.<sup>7</sup> Furthermore, external communication efforts disseminated via social media serve not only to promote ethical business practices but to enhance corporate reputation and trust in the digital age.

### 1.1.3. International recognition of communication in promoting business integrity

Numerous international organizations and initiatives acknowledge the critical role of communication in advancing business integrity and combatting corruption. Key instruments such as the United Nations Convention against Corruption, the Asia-Pacific Economic Cooperation (APEC) Anti-Corruption Code of Conduct for Business, Transparency International's Business Principles for Countering Bribery, the International Chamber of Commerce (ICC) Rules on Combating Corruption, and the OECD 2021 Anti-Bribery Recommendation all emphasise the importance of communication efforts.

Specifically, Annex II of the OECD 2021 Anti-Bribery Recommendation highlights the need for regular internal and external communication regarding a company's ethics and compliance programs. This guidance reinforces that transparency and consistent messaging are vital to embedding a culture of integrity within organisations.<sup>8</sup>

Similarly, the UN Global Compact and Transparency International's Reporting Guidance on the 10th Principle Against Corruption states that "*communication to and training of all employees on your organisation's commitment to zero tolerance of corruption is perhaps the most important and continuous action that your organisation can take*".<sup>9</sup> This underscores communication as a foundational pillar for effective anti-corruption strategies.

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<sup>7</sup> *Corporate Anti-Corruption Compliance Drivers, Mechanisms, and Ideas for Change*, OECD. [Corporate Anti-Corruption Compliance Drivers, Mechanisms, and Ideas for Change | OECD](#)

<sup>8</sup> *Recommendation of the Council for Further Combating Bribery of Foreign Public Officials in*

*International Business Transactions*, OECD. [OECD Legal Instruments](#)

<sup>9</sup> *Reporting Guidance on the 10th Principle Against Corruption*, UN Global Compact & Transparency International. [issues\\_doc/Anti-Corruption/UNGC\\_AntiCorruptionReporting.pdf](#)

## 1.2. The business case for using communication to advance business integrity

In today's complex and highly scrutinised business environment, clear, consistent, and credible communication around business integrity and anti-corruption has become a strategic imperative. Internal and external communication campaigns can reinforce ethical conduct, drive cultural change, strengthen regulatory compliance, and create long-term value. While challenges and limitations exist, the business case for well-designed communication initiatives is increasingly compelling.

### 1.2.1. Opportunities

#### **Internal communication: building a culture of integrity from within**

Internal communication is a foundational component of any anti-corruption strategy. When deployed effectively, it empowers employees, strengthens compliance, and shapes organisational culture in a way that promotes ethical conduct:

1. **Preventing Misconduct and Supporting Early Detection:** Clear and open communication helps prevent unethical behavior among employees by raising awareness of expected standards and providing accessible channels for reporting misconduct. As noted by the UNODC, fostering a speak-up culture is

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<sup>10</sup> *An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide*, United Nations Office on Drugs and Crime (see footnote 3).

<sup>11</sup> [Understanding Whistleblower Protection: Laws, Practices, Trends and Key Implementation Considerations](#)

<sup>12</sup> Ibid.

essential to early detection and internal accountability.<sup>10</sup> In particular, professional accountants, who are often the first to recognise irregularities through their oversight of financial reporting and governance, play a pivotal role in communicating concerns and promoting a culture in which speaking up is valued and protected.<sup>11</sup>

2. **Shaping Organisational Culture and Identity:** Consistent communication around integrity contributes to a shared sense of purpose and ethical identity within a company. Over time, this can transform internal norms, embedding integrity into the company's operational DNA.<sup>12</sup>
3. **Ensuring Regulatory Compliance and Reducing Penalties:** Robust internal messaging supports legal compliance, helping companies avoid or mitigate regulatory penalties.<sup>13</sup>
4. **Amplifying External Credibility:** As the UN Global Compact and Transparency International have noted, "internal communications will be seen externally and thereby add to the strength of the external communication of the organisation's anti-corruption commitment".<sup>14</sup> Employees themselves become ambassadors of the company's values, reinforcing brand credibility through their interactions with customers, partners, and communities.

#### **External communication: enhancing trust, competitiveness and resilience**

<sup>13</sup> *The Benefits of Anti-Corruption and Corporate Transparency*, Transparency International. [Working paper format Corporate transparency v6](#)

<sup>14</sup> *Reporting Guidance on the 10th Principle Against Corruption*, UN Global Compact & Transparency International (see footnote 6).

A foundational element of external communication is mandatory reporting on Anti-Bribery and Corruption (ABAC). Regulatory frameworks such as the European Sustainability Reporting Standards now require multinational companies to disclose their ABAC commitments as part of their annual reporting. Beyond these legal requirements, external communication on anti-corruption efforts sends a strong message to stakeholders, including investors, customers, regulators, and the general public. It supports reputation management, builds competitive advantage, and acts as a deterrent to unethical behavior:

1. **Reputation Management and Recovery:** Following a scandal, proactive and transparent communication can help restore trust, reduce investor uncertainty, and preserve brand equity. Corporate reputation is increasingly central to business success, shaping stakeholder perceptions, financial performance, market value, and even legal outcomes.<sup>15</sup>
2. **Competitive Differentiation and Investment Attraction:** Companies that actively promote integrity position themselves as responsible market leaders. This can improve access to capital, increase customer loyalty, and open doors to partnerships where ethics are a prerequisite.<sup>16</sup>
3. **Talent Attraction and Retention:** Purpose driven employers are particularly attractive to younger generations in today's workforce. Public commitments to integrity and transparency can help companies attract and retain top talent.

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<sup>15</sup> *Exploring Corporate Reputation and Crisis Communication*, Kalle Nuortimo et al. [Exploring corporate reputation and crisis communication | Journal of Marketing Analytics](#)

<sup>16</sup> *Open Business: Principles and Guidance for Anti-Corruption Corporate Transparency*, Transparency International UK. [Open Business.pdf](#)

Preventing unethical behavior also leads to increased levels of overall employee satisfaction.

4. **Deterrence and Signaling:** According to the Basel Institute on Governance, visible external communication efforts act as a deterrent to potential wrongdoers and signal that the company is not an easy target for corruption. This is particularly relevant in high-risk jurisdictions.<sup>17</sup>

## 1.2.2. Challenges

While the benefits are clear, companies must also navigate practical and strategic challenges when implementing integrity-related communications.

### **Cross-cutting challenges: credibility and enforcement**

Perhaps the most critical challenge is ensuring that communication efforts are perceived as **authentic** and that companies do “walk the talk”. External messaging must be backed by meaningful internal action; otherwise, they risk being dismissed as “window dressing.” Without accountability mechanisms, communications can backfire, thereby exposing companies to reputational and potentially legal risks.

### **Internal Communication Challenges**

1. **Message Design and Relevance:** Poorly targeted or overly vague messages risk being ignored or misunderstood.<sup>18</sup> Communication should be authentic, context-specific, actionable, and aligned with

<sup>17</sup> *Strategic Anti-Corruption Communications: Guidance for Behaviour Change Interventions*, Basel Institute on Governance. [240220\\_wp-45.pdf](#)  
<sup>18</sup> Ibid.

employee roles, extending beyond general statements about corruption.

2. **Maintaining Effective Timing and Momentum:** Sustaining engagement over time remains challenging.<sup>19</sup> Impact is often highest when messaging aligns with strategic moments (e.g. leadership transitions, compliance reviews, negative media reports or post-incident reforms).
3. **Adapting Integrity Messages to Diverse Cultural Contexts:** One-size-fits-all messaging may be ineffective or misinterpreted across different cultural contexts. This requires careful adaptation to local norms, languages, employee levels and expectations.<sup>20</sup>

#### **External communication challenges**

- **Public Skepticism and Trust:** The effectiveness of external communication depends on public belief in the company's integrity. If stakeholders suspect that communication is performative or insincere, it can damage, rather than enhance reputation.
- **Ensuring global reach and accessibility of integrity messages:** As the availability of media platforms, digital tools, and news outlets varies significantly across countries, and access may be limited in certain jurisdictions, ensuring accessibility of these messages is necessary.

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<sup>19</sup> *Corporate Anti-Corruption Compliance Drivers, Mechanisms, and Ideas for Change*, OECD (see footnote 4).

<sup>20</sup> *Cultural Differences in Business Communication*, John Hooker.  
[https://johnhooker.tepper.cmu.edu/businessCommunication.pdf?utm\\_source=chatgpt.com](https://johnhooker.tepper.cmu.edu/businessCommunication.pdf?utm_source=chatgpt.com)

### 1.2.3. Limitations

#### **Internal communication limitations**

1. **Message Backfire Risk:** Messaging that lacks specificity or actionability may fail to influence behavior. Without clarity on what employees should do differently, such messages risk confusion or apathy.<sup>21</sup>
2. **Engagement Fatigue:** Repetition of the same message, particularly if poorly tailored or lacking relevance, can lead to fatigue and disengagement. Periodic review and refresh of content is essential to maintain impact.<sup>22</sup>
3. **Resource Constraints in SMEs:** Many SMEs lack the capacity to develop and distribute tailored integrity communication. However, solutions exist, including:
  - participation in broader **supply chain trainings**;
  - utilisation of **freely available communication materials** from international bodies;
  - application of **train-the-trainer approaches**;
  - collaboration through **SME interest groups, local chambers of commerce, or trade unions**;
  - use **AI** as a **support tool** to devise communication material.

#### **External communication limitations**

- **Legal Exposure:** Public statements about integrity can create potential

<sup>21</sup> *Strategic Anti-Corruption Communications: Guidance for Behaviour Change Interventions*, Basel Institute on Governance (see footnote 13).

<sup>22</sup> *Ibid.*

liabilities if future investigations or litigation reveal inconsistencies. While this concern is often cited, it should not discourage companies from communicating about their commitments—provided that such communication is transparent, evidence-based, and supported by internal action.

- **Guardrails: avoid unintended effects of decision aids.** Research shows that poorly designed ethics prompts can backfire (e.g., checkbox compliance, moral licensing, or diffusion of responsibility). These unintended effects can be mitigated through (i) clear, human wording; (ii) linking any **“No/Unsure”** to real escalation paths; (iii) requiring brief free-text reflection; (iv) sampling for *quality of reasoning*, not completion; and (v) periodic A/B tests to retire low-value prompts.

**Section Conclusion:** Communicating about business integrity is not a simple checkbox. When done right, it is a strategic endeavour that delivers tangible benefits for companies, employees, investors, and society at large. To be successful, internal and external communications must be well-designed, credible, and aligned with real-world practices. While challenges and limitations exist, they can be mitigated through thoughtful planning, cultural intelligence, and commitment to continuous improvement.

# Part II:

## Communicating integrity in practice

### - What works for companies

#### 2.1. Typology of effective corporate communication actions to advance business integrity

The use cases submitted by *Business at OECD* members demonstrate that effective communication on business integrity relies on **a structured and continuous system of mutually reinforcing actions**. Companies reporting the strongest engagement and behavioral outcomes consistently adopt a strategic approach to communication, regardless of sector, size, or geographic footprint.

Based on the full set of examples received, this section presents a typology of effective communication practices, with a particular focus on **what works well in practice**. The typology is organised along four interrelated dimensions:

1. Audience-centric design and personalisation
2. Maturity and integration into business processes
3. Formats, channels, and engagement mechanisms
4. Measurement, feedback, and credibility

Illustrative examples drawn from company use cases are included to explain why these approaches are effective.

#### 2.1.1. Audience-centric communication: moving beyond “one-size-fits-all” solutions

##### **Best practice 1: Align integrity communication with roles and risk exposure**

Across sectors, effective integrity communication differentiates messages, tone, and tools according to employees’ roles, exposure to integrity risks, and decision-making responsibilities. Rather than relying on uniform messaging, companies tailor communication to the situations in which ethical dilemmas are most likely to arise.

- **Novartis: Targeted, cinematic anti-corruption programmes**

Novartis developed high-production, cinematic communication campaigns as part of its targeted Anti-Bribery and Anti-Corruption (ABAC) programmes for high-risk markets and functions. These campaigns used teaser trailers, strong visuals, and dilemma-based narratives to raise awareness and interest ahead of mandatory training. By positioning integrity as a personal and professional issue rather than solely a legal requirement, this approach increased receptiveness and engagement before formal learning began.

- **AtkinsRéalis: Cascades of layered messages**

AtkinsRéalis structures integrity communication through coordinated cascades, beginning with messages from the CEO and senior leadership, reinforced by regional and functional leaders, and localised by Integrity Officers through their Integrity Ambassadors. This layered approach

ensures consistency of tone while allowing adaptation to local and operational contexts. It is particularly effective in large, project-based organisations, where credibility depends on visible alignment between leadership messaging and day-to-day realities. This also allows for continuous feedback to support ongoing enhancements.

- **YPF: “Zero Tolerance” integrity and anti-corruption standard**

YPF’s “Zero Tolerance” integrity and anti-corruption standard underpins its communication efforts across a geographically dispersed and operational workforce. The campaign combines digital communication with physical materials, on-site messaging, posters, banners, and QR-code tools to reach employees in operational and field-based roles with limited access to corporate platforms. By explicitly branding integrity communication around a clear, company-wide standard, YPF reinforces consistent expectations while adapting channels to local access constraints.

- **Iberdrola: “Lead with Integrity” and its focus on middle-management**

Iberdrola’s *Lead with Integrity* initiative illustrates how companies can deliberately target middle management as a critical transmission layer for integrity culture. Rather than addressing all employees uniformly, the programme focuses on team leaders and managers with day-to-day decision-making responsibilities, equipping them with case-based tools and conversation guides to facilitate regular integrity discussions within their teams. The use of pulse surveys and follow-up assessments

further allows Iberdrola to tailor content to real managerial challenges and to verify whether messages are effectively cascaded and internalised over time

### **Best practice 2: Treat external stakeholders as full integrity actors**

Several companies extend integrity communication beyond employees to suppliers, business partners, investors, regulators and professional communities. These initiatives help clarify expectations, reinforce accountability and strengthen trust across value chains and markets.

- **Panasonic: Communicating integrity expectations to business partners**

Panasonic communicates anti-corruption expectations to business partners through publicly available guidelines and codes, complemented by internal communication explaining third-party risks. This dual approach aligns internal awareness with external expectations and supports consistent standards across complex global supply chains.

- **IFAC: Integrity communication at ecosystem level**

IFAC promotes integrity through global advocacy, action plans, promotion of an international code of conduct amongst professional accounting organisations and professional accountants globally and toolkits aimed at professional accountancy organisations and regulators. By shaping professional norms across jurisdictions rather than focusing on individual firms, IFAC shows that integrity communication can operate at the ecosystem level, reinforcing integrity as a shared professional standard.

## 2.1.2. Maturity of communication systems

### **Best practice 3: Treat integrity as an “always-on” system**

One successful approach for building awareness is to move beyond one-off campaigns and instead focus on continuous awareness building, and integration into governance and regular operational activities.

- **Siemens Energy: Integrity Week and continuous visibility**

Siemens Energy’s Integrity Week combines leadership messaging, employee storytelling, learning modules and locally tailored events across a wide range of locations. Integrity themes are reinforced throughout the year via internal platforms, town halls, and targeted communications. This regular rhythm embeds integrity into organisational life, rather than treating it as an exceptional topic.

- **SNAM: Governance-embedded integrity communication**

Snam integrates integrity communication into its governance framework and Anti-Bribery Management System aligned with ISO 37001. Codes, guidelines, training, and reporting channels are consistently aligned across the organisation, providing continuity and coherence over time. This systematic approach is particularly effective in regulated and infrastructure-intensive sectors, where credibility depends on procedural rigour.

- **Siemens AG: Narrative-based communication of a comprehensive compliance system**

Siemens communicates about integrity through a structured

narrative that connects past compliance failures, the transformation of its compliance system, and the need for ongoing vigilance. Materials such as its in-house Compliance System presentations frame integrity as a long-term journey rather than a static achievement. By combining leadership statements, historical references, clear descriptions of preventive, detective, and response mechanisms, this approach reinforces credibility as well as institutional memory while linking communication directly to governance and accountability structures.

- **Rolls-Royce: Continuous reinforcement through recurring integrity campaigns**

Rolls-Royce treats integrity communication as an ongoing process through structured communication cycles and recurring initiatives. Campaigns such as *Winning Together, Winning Right* illustrate this approach by explicitly linking ethical conduct, compliance expectations, and speak-up culture to the company’s broader business objectives and performance narrative. The campaign is reinforced through leadership messaging and internal communications, including messages from senior leaders shared via internal platforms to highlight integrity expectations in the context of day-to-day business priorities. Together with on-going integrity initiatives, this approach embeds integrity into the company’s regular communication rhythm and supports sustained visibility beyond single campaigns.

- **YPF: Annual “Zero Tolerance” integrity campaigns**

YPF sustains integrity communication through annual “Zero Tolerance” campaigns aligned with identified corruption risks and compliance priorities. Each yearly campaign builds on the previous one, using recurring themes and refreshed messaging to maintain visibility and momentum. This structured planning cycle helps position integrity communication as a continuous organisational priority rather than a response to isolated events.

- **SAICA: Embedding integrity through its Integrated Ethics Plan**

SAICA communicates integrity as part of its “Integrated Ethics Plan”, a strategic initiative of the SAICA Strategy, which has activities that are implemented to maintain integrity in the profession. These activities include ongoing advocacy initiatives, stakeholder engagements, regular seminars and events on ethics (including the monthly Ethics in Practice series), guidance on how to maintain integrity in the profession and how to deal with ethical dilemmas, as well as thought leadership. This ensures that communication on integrity is ongoing and always at the top of mind in the profession.

#### **Best practice 4: Embedding integrity into everyday decision-making for employees**

High-impact communication focuses less on repeating policies and more on helping employees navigate real-world dilemmas and trade-offs.

- **Deloitte: Ethics learning as a TV-series experience**

Deloitte aimed to re-imagine its ethics training through *Dilemma*, a professionally produced, TV-series-style programme featuring recurring characters and realistic workplace scenarios. Delivered in short episodes and supported by discussion materials and engagement activities, the series transformed mandatory training into a shared learning experience. This approach illustrates how storytelling can help foster reflection, dialogue, and sustained engagement at scale.

- **PLLOB®: Decision heuristics for ethical dilemmas**

PLLOB® provides a simple decision heuristic that translates complex integrity dilemmas into a small set of memorable questions related to rules, reputation, role-modelling, social acceptance, intuition and speak-up culture. Communication relies on concise visual nudges, short videos and leadership references that embed the framework into everyday language. This example shows how simplifying decisions can reduce compliance fatigue and support consistent behaviour across diverse contexts.

- **LPAvocati: Legal design as a credibility and usability tool**

LPAvocati applies a legal design approach to integrity and anti-corruption communication, redesigning compliance content from the perspective of non-specialist end users. By translating complex legal obligations into visually structured, human-centred materials, the firm helps its client organisations better understand regulatory boundaries, particularly in interactions with public authorities. This approach strengthens credibility by preserving legal rigour while improving usability and real-

world applicability of integrity safeguards.

### 2.1.3. Formats and channels: engagement over information density

#### **Best practice 5: Use creative and culturally resonant formats to overcome message fatigue**

Many companies deliberately move away from traditional compliance-awareness building measures to increase recall, relevance, and voluntary engagement.

- **Panasonic: Anti-bribery communication through manga**

Panasonic developed an anti-bribery manga to explain revised rules and typical risk scenarios in an accessible and familiar format. By using storytelling and visuals, the company made abstract risks more tangible, particularly for employees who may perceive corruption risks as distant from their daily activities.

- **Maersk: Unconventional campaigns**

Maersk uses unconventional physical elements, such as temporary sticker tattoos or door hangers, as part of integrity and code of conduct campaigns. These tangible cues act as visual reminders and conversation starters, helping integrity messages stand out amid competing corporate communications. This approach is especially effective for diverse workforces, including non-desk employees.

- **ENI: Multi-format integrity communication ecosystem**

ENI demonstrates how a diversified mix of communication formats can increase engagement across a large and heterogeneous workforce. Its integrity communication ecosystem includes a Code of Ethics film, short “compliance tips” videos acted by employees, an **anti-corruption video game** built around realistic dilemmas, podcasts recorded in local languages, and a dedicated ethics app consolidating resources and reporting channels. By combining storytelling, gamification and mobile access, ENI adapts integrity communication to different learning styles and cultural contexts while maintaining consistent messages.

- **ENI: Anti-corruption video game based on real-life dilemmas**

As outlined in the previous development, ENI developed an anti-corruption video game designed to place employees in realistic business scenarios involving integrity risks and ethical dilemmas. The game allows participants to explore the consequences of different choices in a safe, simulated environment, encouraging reflection on decision-making rather than passive rule memorisation. By using gamification to replicate real operational pressures, ENI enhances engagement and recall while supporting practical understanding of anti-corruption expectations. This approach demonstrates how interactive formats can complement traditional training by fostering experiential learning and supporting ethical judgement in practice.

#### **Best practice 6: Balance global coherence with local ownership**

Effective communication systems combine global consistency with strong local adaptation mechanisms.

- **Nordex and Siemens Energy: Integrity ambassadors and champions**

Both companies rely on local integrity champions or ambassadors who act as approachable points of contact and help translate global campaigns into local context. By giving integrity a human face, these networks normalise discussions about ethics and reinforce peer-to-peer accountability, reducing distance between central compliance functions and employees on the ground.

#### 2.1.4. Measurement, feedback and credibility

##### **Best practice 7: Measure what people see, feel and do**

Leading companies assess not only awareness, but also engagement and behavioural outcomes.

- **Maersk and Nordex: Linking communication to behavioural indicators**

Both companies track how communication campaigns correlate with increased use of speak-up channels, approval processes, or reporting tools. By focusing on behavioural indicators rather than awareness metrics alone, they assess whether communication leads to meaningful changes in conduct.

- **AtkinsRéalis: Survey-driven insight and refinement**

AtkinsRéalis uses regular integrity and engagement surveys to assess awareness, trust, and organisational culture. Results are analysed by region and role, allowing targeted follow-up actions and continuous refinement of communication strategies.

- **Iberdrola: Measuring behavioural impact through sequential surveys**

Iberdrola combines integrity communication with a structured measurement framework based on sequential surveys addressed both to trained managers and to their direct reports. By assessing whether integrity-related discussions actually took place after training, the company moves beyond awareness metrics to evaluate behavioural diffusion and sustained dialogue. This approach demonstrates how communication effectiveness can be assessed through observable managerial practices rather than participation rates alone.

##### **Best practice 8: Ensuring visible follow-up to integrity communication**

Trust and credibility increase when employees see that communication leads to action.

- **AtkinsRéalis: “You said, we did” communication**

Survey findings and employee feedback are followed by visible updates on actions taken, shared through internal channels and leadership messages. This reinforces the value of participation and strengthens confidence in speak-up mechanisms.

- **Saipem: Leadership-led integrity signalling**

Saipem reinforces integrity through CEO/top management-led Integrity workshops and continuous follow-up communication, complemented by digital tools such as e-learning modules and ethics chatbots. Visible leadership engagement signals that integrity is a strategic priority rather than a purely compliance-driven requirement.

- **Rolls-Royce: Communicating outcomes across integrity initiatives**

Across its integrity and ethics communication activities, Rolls-Royce places emphasis on communicating aggregated speak-up data, trends, and follow-up action categories to employees. Making outcome categories visible supports trust in reporting mechanisms and reinforces accountability.

YPF uses employee feedback, surveys, and compliance indicators generated under its “Zero Tolerance” framework to assess the impact of communication campaigns and inform subsequent actions. Insights are reflected in future campaign design and messaging, reinforcing the link between engagement, measurement, and continuous improvement. This approach embeds follow-up directly into the communication cycle.

- **YPF: Feedback and follow-up within the “Zero Tolerance” framework**

**Summary: Best practices for communicating business integrity**

The analysis of company use cases highlights eight best practices that underpin effective corporate communication on business integrity and anti-corruption:

- 1. Tailor communication to roles, risks and decision contexts**  
Effective initiatives adapt messages, tone, and tools to where integrity risks arise and decisions are made—ensuring the right people receive the right information at the right moment.
- 2. Engage external stakeholders as integrity actors**  
Companies increasingly communicate expectations to business partners, investors, and professional communities to reinforce integrity beyond the organisation.
- 3. Treat integrity communication as an “always-on” system**  
Sustained, recurring communication embedded in governance and management routines is more effective than one-off campaigns.
- 4. Support ethical decision-making in practice**  
High-impact communication moves beyond rule transmission to provide practical guidance for navigating real-world dilemmas.
- 5. Use engaging and culturally resonant formats**  
Creative and context-appropriate formats help overcome message fatigue and improve recall across diverse workforces.
- 6. Balance global coherence with local ownership**  
Clear global standards are most effective when combined with local adaptation and peer-level engagement.
- 7. Measure engagement and behavioural outcomes**  
Leading companies assess not only awareness, but also participation, use of speak-up mechanisms, and behavioural indicators.
- 8. Demonstrate follow-up and responsiveness**  
Visible action in response to feedback strengthens trust, credibility, and sustained engagement.

## 2.2. Compendium of corporate communication practices on business integrity

The table below presents a compendium of concrete communication initiatives implemented by companies contributing to this policy paper. The examples below illustrate how the best practices identified in Section 2.1 are applied in practice across different sectors, regions, and organisational contexts.

Company	Overview of communication initiatives	Target audience	Formats and channels	References
<b>Iberdrola</b>	Communicates its integrity and anti-corruption framework through a combination of internal leadership-focused initiatives and public transparency reporting. Key initiatives include the Lead with Integrity programme for managers and the publication of an externally accessible Compliance System Transparency Report	Employees, investors, regulators, business partners, and the general public.	<a href="#">Public report (PDF), Iberdrola website.</a>	Iberdrola <a href="#">Corporate Governance webpage</a>
<b>Novartis</b>	Deploys targeted Anti-Bribery and Anti-Corruption (ABAC) communication programmes for high-risk markets and functions. These programmes use cinematic storytelling, teaser campaigns, and dilemma-based narratives ahead of mandatory training to raise awareness and engagement.	Employees in high-risk roles, functions, and locations.	Videos, internal campaigns, targeted training journeys.	Corporate Ethics, Risk and Compliance communications (internal).
<b>Deloitte</b>	Developed Dilemma, a professionally produced, TV-series-style ethics training programme. The series features recurring	Employees globally.	Video series, digital learning platforms, facilitated discussions.	Internal ethics and compliance training materials.

	characters and realistic workplace scenarios, supported by discussion materials and engagement activities.			
<b>Siemens Energy</b>	Organises an annual Integrity Week, combining leadership messaging, employee storytelling, learning modules, and locally tailored events across its global operations. Integrity themes are reinforced year-round through internal communication channels and Integrity Champions.	Employees at all levels and across regions.	Events, internal platforms, videos, ambassador networks.	Corporate integrity and compliance communications (internal).  <a href="#">Siemens Energy internal integrity communications samples</a>
<b>Siemens AG</b>	Communicates on integrity through a structured narrative linking past compliance failures, the evolution of its compliance system, and the need for continuous vigilance. Includes Compliance System presentations, the <a href="#">Siemens Integrity Initiative</a> , the Compliance Game, and the Compliance Files podcast series.	Employees, business partners, policymakers, and the wider public.	Presentations, podcasts, gamified learning tools, public reports, partnerships.	<a href="#">Siemens Integrity Initiative webpage</a>
<b>Panasonic</b>	Developed anti-bribery manga to explain revised rules and common risk scenarios in an accessible and culturally familiar format. Integrity expectations are also communicated to business partners through public guidelines and codes of conduct.	Employees and business partners.	Manga, written guidelines, internal campaigns.	Corporate compliance and ethics materials (internal and public).
<b>Maersk</b>	Uses unconventional and experiential communication formats (such as <a href="#">temporary sticker tattoos</a> , <a href="#">door hangers</a> , and <a href="#">visual cues</a> ) as part of integrity and data-privacy campaigns. Communication effectiveness is assessed through behavioural indicators such as use of speak-up channels, tracking QR codes, and	Employees, including frontline and non-desk workers.	Physical campaign materials, internal communication platforms.	Corporate integrity and compliance communications (internal).

	clicks/visits to information.			
<b>AtkinsRéalis</b>	Relies on layered leadership cascades and a global Integrity Ambassador network to communicate integrity messages. The company uses regular surveys and a 'You said, we did' approach to demonstrate follow-up on employee feedback.	Employees across regions and functions.	Leadership messages, ambassador networks, surveys, intranet.	Corporate integrity and ethics communications (internal).
<b>Snam</b>	Integrates integrity communication into its governance framework and Anti-Bribery Management System aligned with ISO 37001. Communication is embedded across codes, training, reporting, and supplier engagement.	Employees, subsidiaries, and business partners.	Codes of ethics, training programmes, governance reporting.	<a href="#">Snam sustainability governance webpage</a>
<b>Saipem</b>	Reinforces integrity through CEO/Top management-led Integrity workshops and continuous follow-up communication, complemented by digital tools such as e-learning modules and ethics chatbots. Visible leadership engagement signals that integrity is a strategic priority rather than a purely compliance-driven requirement.	Employees and suppliers.	Events, digital tools, internal platforms.	<a href="#">Saipem business integrity webpage</a>
<b>IFAC</b>	Promotes integrity through global advocacy, action plans, recommendations and toolkits, as well as capacity-building activities aimed at professional accountancy organisations, accountants, standard-setters, and regulators. Supports the development, adoption, and implementation of high-quality reporting, audit & assurance, public sector, education, and ethics standards for the accountancy profession globally.	Professional accountancy bodies, professional accountants, standards-setters, regulators, policymakers, and other key stakeholders including businesses and investors.	Public reports, toolkits, videos, campaigns, partnerships, public events.	<a href="#">IFAC website</a> IFAC ethics knowledge gateway webpage

<b>PLLOB®</b>	Provides a decision-making framework that helps employees assess ethical dilemmas using a small set of memorable questions. The <a href="#">framework</a> is communicated through visual cues, short videos, and leadership messaging.	Employees and managers.	Visual materials, videos, internal communication.	<a href="#">PLLOB website</a>
<b>Rolls-Royce</b>	Deploys a structured, annual ethics and compliance communication plan designed to bridge the gap between written rules and day-to-day behaviours. Communication is tailored by audience and aligned with organisational priorities.	Employees at all levels, senior leadership, middle management, unions and works councils, business partners and suppliers.	Intranet and employee hubs, digital screens, mobile-accessible Code and policies, dilemma-based communications, leadership videos, internal campaigns, external website, <a href="#">LinkedIn</a> , annual reporting.	<a href="#">Rolls-Royce ethics and compliance webpage</a> Public reporting on the <a href="#">Rolls-Royce website</a>
<b>YPF</b>	Implements an annual integrity and anti-corruption communication campaign built around a zero-tolerance standard for bribery and corruption. Campaigns combine internal and external communication and prioritise key corruption risks identified through compliance data analytics.	Employees across all levels and functions, business partners, and third parties.	Internal communication platforms, intranet, videos displayed at facilities, physical posters and banners, QR-code flyers, social media ( <a href="#">LinkedIn</a> ), targeted outreach to third parties, annual compliance events.	<a href="#">CEO video</a> <a href="#">LinkedIn post</a>  <a href="#">Whistleblowing platform</a> <a href="#">LinkedIn post</a> <a href="#">2025 compliance event</a> <a href="#">LinkedIn post</a>
<b>ENI</b>	Deploys a diversified set of integrity communication tools to engage a large and heterogeneous workforce. Initiatives include a Code of Ethics film, short integrity videos, podcasts, a dedicated ethics app, and an interactive anti-corruption video game based on real-life dilemmas.	Employees across functions and geographies.	Videos, podcasts, mobile applications, interactive digital tools.	<a href="#">Eni governance webpage</a>
<b>LPAvvocati</b>	Supports integrity and anti-corruption communication through a legal design approach aimed at improving the clarity and usability of compliance content. Communication materials are redesigned	Client organisations and professionals.	Redesigned compliance materials, workshops, newsletters.	Corporate communications (internal).  <a href="#">Whistleblowing internal communications graphic</a>

	to make legal obligations more accessible to non-specialist audiences, particularly in interactions involving public authorities.			
<b>SAICA</b>	Developed a monthly 'Ethics in Practice' series covering current ethics topics such as the ethical use of technology and sustainability reporting, as well as ethical dilemmas experienced by the profession. Webcasts are communicated through newsletters, SAICA's website, and social media platforms.	Members, Associates, and Trainees.	Live webinars hosted monthly, with recordings available on SAICA's learner management system (Evolve).	<a href="#">SAICA ethics webpage</a> and Evolve learner management system.

# Conclusion

Corruption remains a persistent global challenge, imposing economic, legal, and societal costs that affect businesses, governments, and citizens alike. As this paper demonstrates, communication is a strategic lever for anti-corruption efforts. When embedded into the anti-corruption program, corporate communication can be a strong driver for embedding integrity into the becomes a catalyst for integrity.

The use cases presented throughout this paper show that effective integrity communication is not defined by volume or visibility alone. What distinguishes impactful approaches is their ability to shape behaviour, strengthen decision-making, and build trust across organisational and external ecosystems. Companies that treat communication as an on-going activity, tailored to roles and risks, reinforced by leadership, supported by engaging formats, and measured through behavioural indicators are better positioned to embed integrity into their DNA.

At the same time, indulging in integrity communication is not without risk. Overstatement, inconsistency, or a lack of alignment between message and practice can undermine credibility. The guardrails identified in this paper (such as authenticity, measurement, cultural adaptation, and visible follow-up) are therefore essential. Integrity communication must reflect real commitment, not substitute for it.

Looking ahead, integrity communication will become even more critical in a world shaped by digital transformation, heightened stakeholder scrutiny, and evolving regulatory expectations. Companies are increasingly called upon not only to comply with anti-corruption rules, but to demonstrate transparency, accountability, and ethical leadership. In this environment, communication functions as both a preventive tool and a signal of institutional maturity.

However, no single actor can advance this agenda alone. Businesses, policymakers, professional organisations, and civil society share responsibility for strengthening the integrity ecosystems. Governments can provide enabling frameworks and clear expectations. Companies can innovate in their methods and engagement strategies. The OECD, as a leading standard-setting international organisation can amplify good practices and facilitate peer learning.

*Business at OECD* remains committed to supporting this collective effort. By gathering and sharing practical examples, identifying what works in practice, and fostering dialogue between the private sector and the OECD, this paper aims to contribute to a more effective and credible approach to integrity communication.

Communicating about integrity is a strategic choice. When done thoughtfully and consistently, it strengthens culture, enhances resilience, and supports long-term value creation. In a world where trust is increasingly fragile, integrity communication can help ensure that businesses are at the forefront of the fight against corruption.

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