



# Managing Ethics Upwards

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This article is based upon the findings of a study initiated and supported by the Ethics Resource Center (ERC) Fellows Program.

ERC FELLOWS PROGRAM WORKING PAPER

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## **Acknowledgments**

This study was made possible, in part, by the generous support of:

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## Managing Ethics Upwards

It is widely suggested and accepted that senior leadership plays a vital role in building and fostering an ethical business environment.<sup>1</sup> If that is the case, what is - and should be - the role of the contemporary ethics officer?<sup>2</sup> What is the best relationship between the senior leadership of an organization and the individual they have designated to help foster an ethical organizational?

Who is senior leadership? At a minimum we suggest that senior leadership include the Board of Directors, the CEO and his/her direct reports, the presidents of major business units, vice presidents, chief legal counsel and any other “officers of the corporation.”

Since the early 1990’s, ethics officers have often been designated as the “specific individuals within high level personnel of the organization” who have been assigned responsibility to oversee compliance with the organization’s standards and procedures as specified in the U.S. Federal Sentencing Guidelines.<sup>3</sup>

Recently, two concurrent trends emerging in the role of the ethics officer suggest that organizational beliefs about the office and its roles need to be reexamined.

1. Some corporations have begun to slide the ethics officer down the organization chart so that direct access to the highest level of leadership is decreasing. Examples include having the ethics officer report to senior leadership through one or more levels of management, not providing real access to senior leadership and omitting ethics officers in critical business and strategic decisions. Early in the 1990’s, many of the first ethics officers were, in fact, high-level personnel with direct access to the CEO, the Ethics or Audit Committee of the Board as well as in some circumstances, the members of the Board of Directors themselves.
2. Also, the focus of the ethics officer, in some organizations, is “downward” throughout the organization, spending little - if any - time working with or helping to manage the ethical behaviors of their leadership. While there is little doubt that the vast majority of ethics officers brief their leadership regarding their activities, and take critical policy direc-

tion from them, it is rare that the focus of their efforts targets senior leadership per se. The central focus of today's ethics office remains on employees, not leadership.

Of course, we are mindful of exceptions to both trends. Nonetheless, these two observations, illuminated by the exploratory findings from Ethics Resource Center (ERC) Fellows Program (Fellow Program) research into ethics, leadership and integration suggest that leadership in general - and ethics officers in particular - need to pay more attention to what we have termed "Managing Ethics Upward."

### **ERC Fellows Program Research Findings**

Beginning in 1998, the Fellows Program facilitated a series of research projects, each examining aspects of effective corporate ethics initiatives. From three differing perspectives, each project came to surprisingly similar conclusions on the critical role of senior leadership in fostering an ethical culture.

In a working paper entitled, *Moral Person and Moral Manager: Developing a Reputation for Ethical Leadership*<sup>4</sup>, Linda Klebe Treviño, Laura Pincus Hartman and Michael Brown examine the interesting question of how ethical leaders develop. The key finding from this study is that ethical leadership requires more than a leader who is privately an ethical person. An ethical leader must openly and actively communicate his/her values and strive to build a positive ethical culture.

Josh Joseph, writing on *Integration of Principles into Practice in the Workplace*<sup>5</sup>, examines how organizations put their principles into practice by studying the roles of the ethics office and senior leadership. He concludes it is necessary for the focus to be on the culture of the organization, not just the ethics program, for there to be effective ethics program integration. Imbedded in his finding is the observation that leaders make a critical contribution in the creation of organizational culture; they set the tone at the top and establish expectations about the use of values in guiding behavior and business outcomes.

In *Ethics and Compliance in a Global Economy: Making the Case*<sup>6</sup>, Frank Vogl suggests that many ethics programs are too narrowly focused to meet the challenges of today's global economy. He discusses how ethics officers



contribute in this area by not making the right arguments to the right (senior level) people about what is required for an ethically effective organization. Whether or not you accept Vogl's argument, there is clearly a need for ethics officers to significantly expand their own thinking - as well as the thinking of their leadership - on global ethics issues in order to be successful.

### *Ethics and Leadership*

According to Treviño, Hartman and Brown, there are several different types of leaders:

1. **Unethical Leaders** - Those who believe that ethics has no business in the workplace. Their decisions are not guided by ethical principles. They tend to operate out of personal and pragmatic motives with less concern for the altruistic or idealistic implications of their decisions. This does not mean that every decision is unethical; merely that the ethics of the decision are not considered when it is made.
2. **Ethical Leaders** - Those who are personally ethical in word, thought and deed and conduct their decision making openly so that they are perceived as ethical even from a distance. Not only do these leaders consider the ethical consequences of their decisions, in addition to the individualistic and pragmatic, but also it is obvious to the observer that this is the case. They make a point of ensuring that the ethical aspects of their decision-making process is as visible and transparent as the pragmatic. Additionally, ethical leaders are attentive to culture and symbol aspects of how they act out the "moral manager's" role. They understand that their actions and decisions communicate symbolically as well as literally.
3. **Ethically Neutral Successful Leaders** - Those who are personally ethical in word, thought and deed, but are not open about it. These leaders may not be perceived as ethical from a distance. They are often viewed as not paying adequate attention to the ethical component of their decisions, not because the outcome is unethical, but rather because their decision-making process is not readily apparent.
4. **Hypocritical Leaders** - Those who deliberately choose to act unethically.

Out of this discussion of types of leaders an interesting phenomenon was observed. Ethics officers, in general, understood the concept of the ethically neutral successful leader. CEOs, by and large, argued against the notion. It is apparently difficult for an ethical person, especially one placed highly in an organization, to accept the need for making their private and internal ethical decision-making processes explicit and subject to review.

These leaders find it difficult to accept that it is not enough to do the right thing - but, they must go beyond - articulating how they determined what was right.

When this observation is coupled with the current practice that ethics officers are hired to primarily manage an ethics program “downward” and that senior leadership is somewhat exempt to program structure and related training, we come to appreciate the depths of the problem. This is particularly concerning as there are a number of ethical issues specific to the most senior levels of organizations - from executive compensation issues at the Board, CEO and Executive VP levels to special conflict of interest situations and matters of insider trading.

There appears to be no individual in many organizations who is specifically responsible for managing ethics upward, actively serving as an advisor and counsel to senior leadership on ethics matters in a manner similar to a general counsel’s role in overseeing legal matters.

There is a need for a new perspective as we move forward.

Ethics officers must manage an ethics program in both directions - pushing the program through the ranks and ensuring full understanding, endorsement and participation from the top.

We suggest that every ethics officer invests 25% of his or her total time working with senior leadership to ensure that support for the program is evident and real (in communication and in deed). Just as importantly, ethics officers should be helping these leaders understand and make clear their own ethical decision-making processes and how the ways they make difficult, strategic decisions impact the perceptions of employees throughout the organization.



A 25% investment in working with senior leadership on ethics issues can have a ten-fold impact on the efforts to effectively manage an ethics program downward. Five critical words at the right time from the right senior manager can have a trickle down effect of immeasurable proportions. Just as important, so can five ill chosen words have the effect of undoing a world of good.

The old management adage, “It takes one hundred positives to wipe out one negative” can be applied here. It takes one ethical misstep or the perception of such a misstep to erase any number of prior ethical decisions, actions or choices.

### *Leadership’s Expanded Challenge*

We recognize that allocating 25 percent of an ethics officer’s time to senior management only issues is fraught with challenges. An interesting element of the challenge facing ethics officers as they manage ethics upward is defining the boundaries of the subject - just what is ethics in an organizational context?

The boundary issue has been with ethics officers since the office was first conceived. So many ethics issues are also HR or legal or audit issues that defining “ethics” has been problematic for many. Expanding the role of the ethics officer to include managing ethics upward creates an additional area of overlap between “What is ethics?” and “What is leadership?” which exacerbates the problem. Just how leaders and ethics officers address this particular boundary issue will go a long way towards defining the rest of their relationship.

There is another challenge embedded in the reality that senior leadership’s time is ever scarcer. The roles and responsibilities of senior leadership are expanding - often requiring world travel and an increased amount of time out of the office. In addition, the trend of merging and acquiring to form mega-scale companies has stretched leadership beyond traditional bounds. These factors increase the amount of distance between senior leadership and the many other parts of the company - including the ethics officer.

The modern press and the introduction of high speed, worldwide communications has increased the level of scrutiny and accountability of the mod-

ern organization. Watch dog and special interests groups are constantly on the lookout. In addition, the fiscal strength of the modern mega-company is so vast that they often carry more power than the countries in which they work. As such, they have become higher profile members of the political stage and have a role in world events.

Given the press of events and expanding scope of concerns, the very definition of organizational ethics is also expanding.

### *The Shift from Compliance to Integrity*

In the earliest stages, organizational ethics for most US corporations centered on the narrowest perspective of ethics - the notion of compliance. Are we following the laws? Are we at risk from litigation? If so, how do we minimize that risk?

Ethics programs matured and ethics officers, most of whom were selected from the managerial ranks with little, if any, special preparation, developed increased sophistication regarding the challenges facing their organizations. Both the ethics officers and their organizations began to embrace personal and corporate values in decision making (values-base decision making) as the logical expansion of the definition of what it means to be ethical. What has emerged is what many ethics officers today characterize as the “best practices” model of the ethics office and of a values-based corporation.

But change continues. What is emerging today is a more holistic definition of what it means to be a “good” corporation. This new, global view will again help to reshape the responsibilities and focus of the ethics officer.

The shift to a global perspective means another broadening of the definition of ethics. “Global Integrity” is the latest descriptor, and it embraces both compliance and ethics as described above. It also adds to the definition - concern for rule of law, human rights, good governance, labor/child labor concerns, anti-corruption/anti-bribery, concern for the environment, safety, social responsibility, good corporate citizenship and respect for the whole diverse array of local cultures. This increases the organization’s obligation to reach beyond traditional company boundaries to consider how decisions would affect the surrounding community.



One consequence of this new global definition of organizational ethics is increased scrutiny by stakeholders, especially advocacy groups and the media.

Corporate ethics officers, especially those in multi-national corporations and/or corporations with global suppliers/markets, are being challenged with fundamental questions in this expanded integrity area. Perhaps the most common, and most challenging, is how the corporation will balance the desire for global standards (consistency) against the need for local application of standards (flexibility).

### **Managing Ethics Upwards - Changing the Ethics Office**

Many of today's ethics officers see themselves as staff to the senior leadership, charged with taking the ethics message down the organization chart to the rank and file. That is but half of the focus.

*Perspectives have to shift.*

Senior leadership has to be convinced of the merit of empowering the ethics officer to be a key resource to the senior team: a source of information, a check-point for critical choices, an educator, a conscience and a source of undiluted truth and unchecked candor. Every senior leader needs someone who is freed from fear of retaliation or concern for personal career goal, who has the courage, but more importantly, the charge to speak up when the emperor is about to go out naked.

Ethics officers have to see themselves as more than executing the senior staff's ethics agenda and imposing it on the organization below. They are, and need to see themselves as a key player at the executive level. That also suggests that senior management needs to see ethics officers as part of the senior staff. While often several "pay grades" below the senior team, ethics officers require as much or more access to the top as those who report directly to the senior leadership. That will not happen if the senior staff and ethics officers do not agree that the ethics officer is entitled to that level of access and if they cannot make the case for it effectively and regularly.

### ***Enlarging the Scope of the Ethics Officer***

The job of the ethics officer is enlarged significantly by this shift in focus. It may be that additional resources are required, since the traditional focus

downward through the organization should not be sacrificed. Traditionally, the ethics officer has had to argue mightily for resources after the initial spate of interest and investment in creating the ethics program. That is not likely to change. Resources are and will likely remain the reason senior managers will be reluctant to accept changes in the ethics office's role and scope. In some cases, the real reasons may lie deeper.

At some companies, the real reason for resistance may be that senior leadership does not see the need for the presence of the ethics officer at the table. They believe that they can handle that role. Empowering the ethics officer to manage upward may also be seen as a threat by some of the senior leaders. Or it could simply be a status issue, with the senior leader not comfortable taking direction or guidance from someone perceived to be of a lower level.

As suggested above, the shift to managing upwards is no minor adjustment in the role of the ethics officer. It constitutes a major shift in perspective and recasting of that role. What follows are several strategies for managing that shift. It is not expected that any ethics officer will find all of the strategies appropriate and/or feasible, but every ethics officer should include many of them in their redefined position.

To begin, we recommend focusing on three key areas: (1) formal communications, (2) informal communications and (3) strategic planning and decision-making.

### *Formal Communications*

The ethics officer should be included in the review process of all major communications emanating from the senior leadership team. This is not for approval purposes, but for a review of the likely perceptions that employees will have of senior leadership's commitment to ethical standards. Left unreviewed, it is easy for a key document or communication to misstate the point and inadvertently undo months or years of effort and investment.

Example: A CEO of a hospital chain spent two years trying to create a corporate culture built on the notion that quality care and the highest ethical standards were the two pillars upon which both mission and financial success would depend. In an effort to underscore the need for financial respon



sibility, he decided to send a letter to every one of his 14,000 employees urging them to pay careful attention to cost controls and make every reasonable effort to balance patients' needs against the system's need to manage its finances.

The message received by many employees was "Reduce cost by whatever means possible. Nothing else matters but financial performance." Clearly not his intended message, this ill conceived communication undermined his credibility with employees and did terrible damage to the ethics initiative. There is symbolic content in this story that the CEO overlooked and which the ethics officer should have noted, if only he had been given the opportunity to comment on the letter.

An ethics officer positioned, as part of the communications team, would have been able to remind the CEO to include the ethics/care message and perhaps even pointed out that 14,000 first class letters might not be the best way to communicate a concern for cost-control.

### *Informal Communications*

There is no substitute for the informal communications that take place in the organization. It often has more credibility and strength than formal communications. Nothing has more power than stories.

Example: A newly-appointed police chief made a point of showing his direct reports a small stack of traffic tickets he had received. These were speeding tickets issued by the radar-controlled cameras along the interstate. Several were "justified" as he was responding to a police call in his personal vehicle. Others were because he, like most of us, was simply in a hurry.

He explained to his employees that he had paid for all of the tickets and attached copies of his cancelled personal checks to each. He went on to explain that he kept the tickets in his desk for when influential friends dropped by looking for a favor - a ticket to be "fixed". He would show them that he did not even fix his own tickets, so they should not expect him to do so for them.

The message to his employees, though indirect in keeping with his personal style, was crystal clear - we have a stated value, honesty, which he takes seri-

ously.” In effect, he stated, “I do not fix tickets. You had better not either.” Word spread through the city, and respect for the chief and confidence in his commitment to the city’s ethics initiative both increased.

Ethics officers have access to organizational data - issues raised, questions asked, actions taken, decisions rendered - that form the basis for creating a new set of stories. By carefully selecting and communicating illustrative and educational examples, the ethics officer can help clarify what the organization means - in practical and relevant ways - when it tells employees and others that it expects every decision maker to “do the right thing”. Informal communications can clarify priorities and provides examples of exemplary behavior.

### *Sitting at the Strategic Table*

Very often the strategic decision making team is so intently focused on their business purpose that they may slight the organization’s values and principles without even noticing.

Example: In their eagerness to acquire a strategic partner, one corporation ignored evidence revealed during the “due diligence” process regarding ethically questionable actions of the former VP Marketing of the corporation being courted. Four years after the acquisition and seven years after the unethical conduct, this small defense supplier was temporarily debarred from government contract work while a full-scale investigation was conducted.

The cost was staggering to the bottom line and the reputation of both the organization and its leadership. An ethics officer, sitting in on the deliberations, might have been able to point out the risk and convince the leadership to continue the search, rather than acquire a potential ethics/compliance disaster.

### *Specific Strategies for Managing Ethics Upward*

Managing ethics upwards is easier said than done. It entails some genuine diplomacy and skill. A number of ethics officers have expressed concerns about the challenges of accomplishing such a shift in their own, as well as their leadership’s thinking. To develop a more robust dialogue about such issues, a brainstorming session was conducted by Michael G. Daigneault, President of the Ethics Resource Center and Convener of the ERC Fellows



Program, and Jerry D. Guthrie, Corporate Director, Ethics, Compliance & Business Conduct at BellSouth Corporation and Member of the ERC Fellows Program, at the October 1999 meeting of the Ethics Officer Association.

More than one hundred ethics officers participated and suggested a number of specific strategies for the delicate task of managing ethics upward.

1. *The “Bubble-Up” Strategy*

Use specific cases and questions bubbling up from the employees of the organization to meaningfully involve the senior leadership in a good faith discussion of what is the appropriate course of action for each case and question. Help senior leadership see the strong connection between their actions and words and the conduct of their employees.

2. *The Structure Strategy*

Focus carefully on the way in which the ethics function is structured. Does the ethics officer have real access to senior leadership? Is genuine senior leadership input and involvement encouraged or discouraged through various communication channels? Is sufficient time allocated for ethics matters? Are meetings structured to merely report to senior leadership or to encourage their involvement as well as to educate them on some of the issues that are arising?

3. *The Survey Strategy*

Survey the entire employee population (or a statistically significant random sample) and ask questions about employees’ perceptions of the organization’s ethical culture as well as their view of senior leadership. Brief senior leadership on the results of the survey and help them to action plan specific strategies for themselves and the organization to address issues that arise in the survey results.

4. *The “Hot Buttons” Strategy*

Research and identify specific causes and “hot buttons” that are important to senior leadership. Utilize those causes to work closely with senior leadership to help them contribute to the success of the entire ethics effort. Note, for example, that an ethics program may be significantly enhanced through the actions of a CEO who is a genuine patron of various corpo-

rate responsibility activities. While the two may appear to be separate realms, employees (and others!) generally connect the two as the ways in which an organization lives its values.

5. *The Best Practices Strategy*

Some leadership teams respond positively to “what the other guy is doing.” Research the ways in which other organizations involve their senior leadership in ethics issues. Do they have codes of ethics that apply specifically to the Board? Are there special issues that have been identified that the senior leadership team must be particularly mindful of? Has the senior leadership held a retreat or special training on ethics issues?

6. *The 360 Degree Feedback Strategy*

Encourage senior leadership to utilize a 360 degree evaluation strategy. Help ensure that as part of the process, attention is paid to the ways in which management makes ethical decisions and communicates to all critical stakeholders. In addition, an aspect of the process should be the ways in which senior leaders foster the values of the organization. Specific practices that hinder the development of an ethical organizational culture can be identified and eliminated through this type of process.

7. *The Education Strategy*

Provide senior management with numerous opportunities to learn more about their critical role in developing the ethical climate of their organization. Supply them with a regular stream of articles, newspaper clippings, speeches, e-mails, reports, surveys, conferences, meetings, briefings, retreats, etc. to involve them in the expanding realm of issues that they must be prepared to successfully wrestle within the ethical realm.

8. *The “Pay Me Now or Pay Me Later” Strategy*

Point out that a small amount of preventative maintenance can save the organization a great deal of breakdowns and problems down the road. Involve leadership directly in thinking through what that prophylactic strategy should be. As the next section will outline, even small changes at the start can make a huge impact in the long run.



## Moving Forward

As noted in the discussion of ethically neutral successful leaders above, many senior level managers who view themselves as ethical, do not fully understand the critical role that they must play. They do not see the need for an ethics officer at their elbow. They may find the mere suggestion of being “managed” by the ethics officer insulting, the idea totally offensive to their sense of self.

What is needed is the same degree of collaboration and communication among ethics officers as we see in the discussion of best practices. Ethics officers should be discussing this challenge and sharing successes and strategies to enable their peers to progress in the effort to shift the focus to include managing ethics upward.

This is not a shift that will occur easily, swiftly or through the work of others. Those of us who believe that managing upward is more than just a good idea - that it is an essential strategy necessary to prevent ethics programs and ethics officers from being marginalized, must find a common voice and work for this change. Perhaps more research needs to be done. Certainly more needs to be discussed and written on the subject before it will have the gravity and “critical mass” needed for success.

## Endnotes

1. This working paper is designed to apply to both the for-profit and non-profit realms. For the sake of brevity and flow we will utilize the words “business” and “workplace” to apply to all forms of organizations - regardless of their tax status.
2. We will utilize the term “Ethics Officer” to refer to that individual within an organizational setting that has been given the responsibility of ensuring that the values and standards of an organization are understood and abided by the relevant stakeholders of the organization. Such a responsibility has been given many different titles - ethics officer, ethics and compliance officer, or compliance officer.
3. Federal Sentencing Guidelines Manual: United States Sentencing Commission, The West Group: 1999.

4. See ERC Fellows Program, Exploratory Research Findings August 1999, Tab 4.

5. See ERC Fellows Program, Exploratory Research Findings August 1999, Tab 5.

6. See ERC Fellows Program, Exploratory Research Findings August 1999, Tab 2.



The Ethics Resource Center (ERC) is a nonprofit, nonpartisan educational organization whose vision is an ethical world. Its mission is to be a leader and a catalyst in fostering ethical practices in individuals and institutions. The ERC fulfills its vision and mission through groundbreaking ethics work in our four core leadership areas: *Institution & Coalition Development, Research & Knowledge Building, Education & Advocacy* and *Consulting & Technical Assistance*.

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