



# TALKING THE WALK

CONVERSATIONS FOR ETHICS & COMPLIANCE TEAMS

## Case Scenario

### Case 10

## THE GIFT THAT KEEPS ON GIVING

“Thanks, Bethann, for springing for the good fruit. These are delicious!” Francine gushes while noshing on a fat, juicy pear.

“Happy to do it. Just one of the perks of my fab new job. Gotta love the holidays—and clients with generous expense accounts.”

Francine is a little surprised by Bethann’s response.

“Wow! Your work actually lets you keep stuff that comes in? In my office, everything gets sent back, donated, or added to the break room communal stash. They take it pretty seriously. Some big exec got in trouble for accepting box seats from a contractor, so they laid down the law.”

“Yeah, but that’s a vendor,” Bethann counters. “Isn’t that a different thing? It’s like a bribe or something. But with your clients, they’re already paying you. Why should it matter? When I was a kid, my dad was always bringing home fancy chocolates and those weird sausages no one ever eats that he got from his clients.”

“Maybe it’s just my company. They tend to take everything so seriously. Your work does seem more laid back.”

The next morning...

Bethann opens her email to the cheery monthly message from the CEO: business is going well, been a great year; at this time of year I’m reminded how thankful I am for you and all your hard work; great things ahead for us; etc, etc, etc. Suddenly, her eye is drawn to a section, “Thank you in advance for your continued respect of the company gift policy. As you already know, it’s critical that we avoid even the appearance of anything that could be deemed improper. We appreciate your understanding and diligence. It makes a difference!”

*Well, that isn’t the best news... I wish I’d known about the gift policy—yesterday. I don’t know. Maybe they mentioned something about it at orientation. I just don’t remember. They gave us so much information that week....* Bethann swallows hard. *Do I really need to speak to Michael about this? Ugh. He haaaates when I knock on his door.*

### THE CHARACTERS

Bethann: a younger employee, right out of college, in her first professional job

Francine: Bethann’s roommate

Michael: Bethann’s supervisor

### Questions for Discussion

#### TALKING THE TALK

1. What should Bethann do next?
2. Whose responsibility was it to make sure that Bethann knew the policy?
3. What could the company have done to help Bethann make the right call?
4. Once Bethann tells Michael what she did, what should his response be? The company's?

---

---

---

---

#### WALKING THE WALK

5. How likely is something like this at our company?
6. How good are we at informing employees of our gift policy and reminding them of it? Who else (other departments, managers, etc.) could we enlist in our efforts?
7. How would we handle an incident like this?
8. How well do we prepare managers to handle situations like Bethann's report to Michael?
9. Michael doesn't sound like a very approachable manager. What does our company do to ensure that supervisors encourage speaking up? What else could we do?

---

---

---

---

#### FROM THE ECI DATABANK

According to ECI's 2018 GBES\*:

**7%**

of employees  
**OBSERVED  
ACCEPTING**

**BRIBES, KICKBACKS, AND/  
OR INAPPROPRIATE GIFTS**

from suppliers or vendors in the  
previous 12 months.



Nearly two out of three workers  
(64 percent) **say their supervisor  
talks about the risks they face in  
their work and how to address  
them.** Almost as many (63  
percent) say top management  
does.



Almost two in  
three employees  
(64 percent) feel  
comfortable raising  
issues to supervisor.

\* <https://www.ethics.org/knowledge-center/2018-gbes/>