

Ethics Control Mechanisms: A Comparative Observation of Hong Kong Companies

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ABSTRACT. Managers with different cultural backgrounds and under different circumstances have different views on what is acceptable ethical behaviour. This study attempts to determine whether major companies in Hong Kong share the same views as North American academics on what management ethical standards ought to be, and if so, whether any control mechanisms have been established to instill ethical behaviour within their organizations. Notable differences between the practice in these companies and those from a similar survey conducted in North America are identified and explained. The management accountant's role in the development and implementation of such mechanisms are investigated.

KEY WORDS: code of ethics, corporate governance, ethics, ethics control mechanisms, whistle-blowing

Introduction

The question of management ethics is viewed by managers using different benchmarks. When making ethical judgements, some are merely bound by legal requirements, society's norms and professional ethics. Compliance with the aforementioned constraints constitutes all that is required by the organization to survive. Others such as Tuleja (1985), Paine (1994), etc. see survival ethics to involve balancing the interests of all stakeholders in the community-at-large. While there are cultural differences, there are also shared areas of agreement concerning right and wrong in all ethical matters. Hence, dilemmas often have their roots in people's attempts to address competing pressures, goals, values, etc. For example, the closure of an unprofitable plant in a small community could discharge managers' responsibilities to the shareholders, but not to the

community-at-large when it comes to displacing employees in the closed plant. Marketing hazardous products in certain third world countries with more relaxed safety regulations could meet legal requirements of those countries, but could invite ethical considerations in the seller's country. Involving one's company in bribery to successfully negotiate a business deal when such practice is common in that part of the world also should be assessed against one's own ethical standards.

Hong Kong with its booming economy even after the 1997 changeover and its population of over six million, is one of the most affluent cities in the world. Society norms are governed by a blend of traditional Chinese culture and western civilization brought about by roughly 150 years of British colonialism. In this fast-paced economy, ethical standards in business dealings may be inclined towards being pragmatic, rather than being based on one's personal goals and values.

The purposes of this study are to determine whether ethics control mechanisms have been established by major Hong Kong companies to instill ethical behaviour within their organizations, whether management accountants are involved in the development and implementation of such mechanisms and whether differing views exist within these companies on management ethics and ethics control mechanisms from those of academics as revealed through the literature review.

The approach to this study is to explore what management ethics really encompass in the North American context, to arrive at ethics control mechanisms and to show how this may be linked to components of a management control system designed by management account-



tants. Subsequently, a review of comparative ethical issues in different countries including Hong Kong suggests that cultural differences for the most part, do have an impact on views towards acceptable ethical behaviour. Finally, a questionnaire is sent to all of the listed companies in Hong Kong, requesting them to indicate, the type of ethics control mechanisms, if any, they have in place, the management accountants' involvement in three of the more popular mechanisms and their views towards management ethics and control mechanisms.

A later section also addresses the role of management accountants in the area of management ethics. As management accountants are involved in setting management control systems, a review of the linkage of ethics control mechanisms with components of a management control system indicates what management accountants can or cannot do in influencing the ethical behaviour of an organization.

Management ethics

Tuleja (1985), pointed out that the public has very little regard for the honesty of business executives. In 1983, a public opinion poll indicated that only 18% of those polled put the standards of such executives at "high" or "very high". This stems from the fact that it is scandal rather than virtue that sells papers. For example, no matter how diligently an oil company may have worked to safeguard the environment, it is still the oil spill that makes page one. Furthermore, there is the widespread belief that "you've got to have a little thief to get ahead" in business. The culprits ranged from companies being caught giving illegal campaign contributions to being nailed for price-fixing and tax fraud to being found for bribing government officials. Lesser offenses included discriminatory hiring practices, false advertising, willful pollution of rivers, peremptory closing of plants, etc. The result of a study done by Lee and Yoshihara (1997) on business ethics of Korean and Japanese managers indicates that business executives believe basically in higher level business ethics, but occasionally have to make unethical business decisions which conflict

with their personal values, because of prevailing business practices.

Yet, business is expected to be moral. In an economy where the consumer is sovereign, it may be expected that sooner or later, public outrage will tend to raise the overall level of business conduct. Corporate leaders themselves are upset by moral lapses. They prefer alternatives that would work towards the long-run benefit of the firm as North Americans today are asking the private sector to go beyond the traditional bottom line of dividends and profit. They are asking the business leaders to adopt strategies for a new bottom line that not just takes shareholders, but the entire population as its constituency. Thus, the modern view of the corporation as a manufacturer of jobs as well as products or services dictates the corporation in engaging in a shift to co-operating with the government as a major force for social change. Donald MacNaughton, the former chairman of Prudential Insurance said that business is not simply an economic institution, but a socio-economic institution with a primary responsibility to society as a whole, and a secondary responsibility to stockholders and employees (Tuleja, 1985).

Some may claim that ethics is a personal commitment and that it has nothing to do with managers. From an organizational point of view, ethics has everything to do with management. Paine (1994) believes that unethical business practice involves the tacit co-operation of others and reflects the values, attitudes, beliefs, language and behavioural patterns that define an organization's operating culture. Thus, managers who fail to provide proper leadership and to institute systems that facilitate ethical conduct share responsibility with those who conceive, execute and knowingly benefit from corporate misdeeds. Executives who ignore ethics run the risk of personal and corporate liability in today's increasingly tough legal environment.

Many companies are implementing compliance-based ethics programmes to prevent, detect and punish legal violations. But organizational ethics means more than avoiding illegal practices. To foster a climate that encourages exemplary behaviour, corporations need a comprehensive

integrity-based approach that combines a concern for law with an emphasis on managerial responsibility for ethical behaviour. Managers who merely define ethics as legal compliance are implicitly endorsing a code of moral mediocrity for their organizations. Furthermore, employees may rebel against programmes that stress penalties, if they are imposed without employee involvement or if the standards are vague and unrealistic.

The task of ethics management is to define and give life to an organization's guiding values, to create an environment that supports ethically sound behaviour and to instill a sense of shared responsibility among employees. Paine (1994, p. 111) sees the hallmarks of an effective integrity strategy as being fivefold. Firstly, the guiding values and commitments make sense and are clearly communicated. Secondly, company leaders are personally committed, credible and personally willing to take actions on the values they espouse. Thirdly, the espoused values are integrated into the normal channels of management decision making and are reflected in the organization's critical activities. Fourthly, the company's system and structure support and reinforce its values. Lastly, managers throughout the company have the decision-making skills, knowledge and competencies needed to make ethically sound decisions on a daily basis.

Finlay (1995), suggests that self-aggrandizement is another folly that afflicts both the economic and ethical performance of many companies. It frequently begins at the top where people who head organizations forget why they have power and their accountability. They often place personal ego over corporate good. Indifference to the needs and interests of customers and shareholders is no more ethically acceptable among managers and executives than is indifference to the interests of patients and clients among doctors and lawyers. Efforts and actions taken by companies that divert attention and resources from the principal mission of the business or that allow it to be run by the convenience of management at the expense of stakeholders are inherently unethical. He sees that very little can be done by staff personnel and line management tends to be preoccupied by daily

operational problems. Chief Executives often become the cause of problems if corporate assets become the squandered possessions of such self-obsessed individuals. He sees boards serving to protect the underlying integrity and viability of the corporation, by beginning with a commitment to raise the priority that has traditionally been attached to such matters. Following this, an ethics and accountability of the board should be established to examine issues that impinge upon the organization's integrity.

Building ethical organizations

Ethical organizations can be shaped by using the tools of organizational design – structure and systems – to build a broad base of people who are committed to moral management and continually reinforcing their ethical behaviour. Gandz and Bird (1989) suggested eight different ways that this might be achieved, three of which are worthy of mentioning. Firstly, the subject of ethics should be addressed explicitly in the training and development of staff at all levels of the organization. Secondly, clear channels of communication must be established for employees who suspect that unethical behaviour is going on within the organization. Whistle-blowers who approach in confidence must have their privacy respected, even if this makes investigation difficult. If and when the identity of the complainant becomes known, it may require a great deal of management support for that person. Thirdly, exhibit model behaviour constantly by immediate superiors. The first two ways contribute directly to the implementation of two of the ethics control mechanisms discussed in the following section, while the last point was also cited by Lee and Yoshihara (1997) in their study of business ethics of Korean and Japanese managers as being most important in improving ethical standards.

Corporate ethics and the management accountant

Irvine and Lindsay (1994) indicated that a company’s management control system could include various formal ethics control mechanisms designed to instill an ethical orientation into decision making. Seven such mechanisms, including code of ethics, were identified and were linked to one of the three components of a management control system. It is recognized that the boundaries of these components were fuzzy and that the mechanisms necessarily interact.

Ethics control mechanisms	Component of a management control system
Code of ethics Employee training in ethics Ethics-focused corporate governance	Specifying and communicating objectives
Whistle-blowing channels Ethics committee Judiciary board	Monitoring performance and feedback
Ethics-focused reward system	Motivating by linking reward system to performance

Source: Irvine and Lindsay, 1994.

What is the management accountant’s role in instilling ethical behaviour? Since he/she is significantly involved in the design, implementation, use, and maintenance of the information system which is a fundamental aspect of a management control system, he/she may be expected to play an important role in implementing and using ethics-related control mechanisms in a company. As the management accountant is governed by professional ethics, he/she has a particular expertise in the area, is the keeper of the corporate conscience, or is the bell-weather person when it comes to management ethics.

For the same article, Irvine and Lindsay (1994) did a survey by sending a questionnaire to 300 Canadian company controllers of which 171 or 57% responded. The survey results include the following:

- (1) 74% of the controllers responding indicated that they used at least one of the seven ethics control mechanisms or taking some other specific action to promote ethical behaviour, while 84 companies (49% of respondents) indicated the former.
- (2) The most commonly used mechanism was a code of ethics (78 of the 84 companies).
- (3) Slightly less than one half of the 84 companies had instituted whistle-blowing processes.
- (4) Employee training in ethics existed in about 30% of the organizations.
- (5) The remaining four were not popular, notably low was an ethics-focused reward system.

Further studies for the same article conducted by the aforementioned authors indicated that while the management accountant is not likely to be the person having primary responsibility for an ethics control mechanism in most organizations, he or she could still be expected to play some role. The three most commonly used mechanisms are code of ethics, whistle-blowing involvement and employee training in ethics.

As a result of these studies, the following observations were noted: Firstly, companies with foreign (primarily US) parents had more ethics control mechanisms than did those with Canadian parents. Secondly, many companies had a code of ethics, but few employed mechanisms to monitor ethically-oriented performance and even fewer provided motivation for ethical behaviour through a reward system. Thirdly, ethics and ethical behaviour are not phenomena that can be confined as areas in which a particular group, such as management accountants, have a unique expertise or responsibility. Fourthly, ethically-oriented behaviour in an organization is a broad-based management responsibility.

Corporate ethics in Hong Kong

With changing environmental conditions, Hong Kong has moved in the recent decades from a society primarily dominated by cottage industries

to a highly industrialized one. With extreme pressure to achieve profits, unethical behaviour may be more tolerable than in most of the western countries.

Although not directly related to Hong Kong, Mehta and Kau (1984) compared ethical perceptions of Chinese businessmen in Singapore and the United States and found that across-the-board generalizations concerning ethics are impossible. For example, Americans regarded the heavy padding of expense accounts to be more unethical than did Singaporeans, but the Singaporeans found the use of company time for personal business to be more unethical than did the Americans. Dubinsky et al. (1991) concluded that nationality influences salespeople's beliefs about the ethics of selling practices and the need for company policies to guide those practices in the United States, Japan, and South Korea. White and Rhodeback (1992) compared American and Taiwanese business students on the extent to which cultural differences bear on perceptions of ethical Organizational Development consulting behaviours and concluded that subjects from the United States tended to provide higher ethicality ratings than the Taiwanese respondents. Dolecheck and Dolecheck (1987) compared ethical perceptions and attitudes of Hong Kong and U.S. personnel and concluded that Hong Kong managers were more likely to define business ethics as simply operating within the law, felt greater loyalty to protect the organization by which they were employed, were less likely to whistle-blow and felt compelled to compromise personal principles to conform to their organization's expectations and that the behaviour of one's superiors was deemed the most influential factor on ethical behaviour in both Hong Kong and United States. McDonald et al. (1996) also concluded that Australians generally perceive potentially unethical actions less acceptable than Hong Kong managers. Nyaw and Ng (1994) concluded that the national origin of students from Canada, Japan, Hong Kong and Taiwan does have an impact on their reactions to particular ethical dilemmas involving employees, supervisors, customers, suppliers and business rivals. Respondents from Hong Kong show less ethical concerns towards customers, suppliers and

sex discrimination while Japanese and Taiwanese are less likely to react in an ethical manner on issues involving supervisors and/or business rivals. In contrast, Canadians are more tolerant of unethical actions affecting the job security of employees.

These differences could be partly explained by the conclusion of Leung et al. (1996) in that "Guanxi" is another marketing variable which China trade executives must manage. China may have a different concept of bribery and corruption and therefore, giving gifts or providing market investigation trips to clients in China may be considered as norms rather than exceptions. The research also suggests that firms take a rigid approach to some sensitive issues such as undercutting commission at company level but they psychologically accept the idea of "under-table" method at personal level. As Hong Kong is now part of China with heavy trade and investment in the mainland, one may have to adopt a double standard to allow the necessary flexibility in China dealings.

Roberts (1984), in his study when being the Manager of Management Development at Hong Kong Telephone Company presents a contrasting view. He believes that values may be related more to industrialization than to culture.

The survey

As very little in the way of ethics control mechanisms, have been reported in Hong Kong academic literature, it should be of vital interest to academics and managers how management accountants in Hong Kong representing local listed companies would view management ethics, whether the seven mechanisms as suggested by Irvine and Lindsay have been implemented and the extent of management accountants' involvement in such implementation. Listed companies were chosen because their names and addresses were readily available through the Hong Kong Stock Exchange and because these companies were mostly well established and that profit maximization might not be their first priority. The following conditions stipulated by the Hong Kong Stock Exchange give some indication of

the sizes and fields of these listed companies. In order to have an applicant company listed, the company must have a trading record of not less than three financial years during which the profit attributable to shareholders must in respect of the most recent year, be not less than HK\$20 million and in respect of the two preceding years, be in aggregate, not less than HK\$30 million. The profit mentioned should exclude any income or loss of the issuer, or its group, generated by activities outside the ordinary and usual course of its business. The Exchange may accept a shorter trading record period and may vary the above profit requirement for natural resource exploration companies, newly formed project companies or exceptional circumstances where the issuer or its group has a trading record of at least two financial years. The expected market capitalization of a new applicant at the time of listing must be at least HK\$100 million while those held by the public must be at least HK\$50 million. The industries represented by the listed companies as per the Sing Tao Daily News are banking and finance (5%), conglomerates (7%), hotel, food and beverage (4%), industrial manufacturing (18%), garment manufacturing (4%), public, transport and warehousing (3%), electronics (10%), properties (14%), construction (6%), media and telecommunications (3%), retail and distribution (11%), China enterprises (6%), China affiliated companies (3%) and China H shares (6%).

The sample questionnaire in the Appendix was sent to the Finance Directors or Chief Financial Officers of all 637 listed companies in Hong Kong. They were asked to complete the questionnaire to the best of their knowledge. The results are compared to those of the Irvine/Lindsay study based on Canadian companies. Differences and similarities are analyzed and conclusions reached.

Findings

59 out of the 637 companies (9.3%) responded as compared with a response rate of 57% out of 300 in the Irvine/Lindsay case. This is typical of the Hong Kong scenario possibly because of

work pressure and to a greater extent, non-implementation of ethics control mechanisms. Etheredge (1996) indicated that the response rate in Hong Kong is notoriously poor, particularly in the case of companies without codes. The low response rate may be taken as a reflection of Clark's (1966) comment that distributing the questionnaire to a large group of respondents was likely to bring answers from those who especially regarded the subject of business ethics as important. Bond (1987) also indicated that Chinese people are reluctant to release personal information. Corporate governance while not popular in Canada according to Irvine and Lindsay (1994), was highest on the list in Hong Kong (38 or 64.4%), followed by code of ethics (35 or 59.3%). This latter was the most commonly used one in Canada (45.6%). A Z-test is used to test the hypothesis that the proportion of companies answering "yes" to the question is more than the proportion of companies answering "no" in our sample. The Z-tests show that the proportion of companies having code of ethics in place is significantly more than the proportion of companies having no code of ethics at the 10% level of significance. Furthermore, the proportion of companies having corporate governance is significantly more than the proportion of companies with no corporate governance at the 5% level of significance.

Whistle-blowing channels and employee training in ethics each had 26 or 44.1%. These two were also ranked numbers 2 and 3 respectively, in Canada. Notably low in Canada was the ethics reward system and in Hong Kong too, this was low, being the second to the last (9 or 15.3%). Judiciary board was the least popular one in Hong Kong with only 3 or 5.1%.

10 of the 59 respondents (16.9%) reported no ethics control mechanisms whatsoever whereas 1 reported of having all control mechanisms with 100% management accountants' involvement in everything. Of the companies that do not have employee training in ethics, 5 had management accountants providing informal reminders and training regarding the existence and understanding of company policies and code of ethics while 1 provided training to Finance staff highlighting integrity, ethical values and competence

in addition to what the other 5 had done. Some companies had certain control mechanisms in place, but no management accountants' involvement, e.g. 4 in code of ethics, 1 in whistle-blowing channels and 2 in employee training in ethics. 2 companies had no whistle-blowing channels, but had management accountants report awareness of suspected unethical behaviour or serving as possible sounding boards for possible conflicts.

Only one of the 59 respondents provided comments to part 3 of the questionnaire. The individual commented that the best control mechanism was self-discipline as the highest level of ethical control was dependent on personality and professionalism of key staff.

Conclusions

One may conclude that the results of the survey show a significant percentage of Hong Kong listed companies (83.1% of respondents) having at least one or more ethics control mechanisms in place and that the three most commonly used mechanisms in Canada also ranked number two and number three (numbers two and three in Canada both ranked number three in Hong Kong) in Hong Kong. Management accountants' involvement with such mechanisms is also higher than in Canada, i.e. code of ethics (88.6% versus 10.0% in Canada), whistle-blowing channels (96.2% versus 17.9% in Canada) and employee training in ethics (92.3% versus 8.3% in Canada). Design and implementation of the first two mechanisms in Canada fall mostly in the hands of senior executive officers (73.3% and 59.0% respectively) while the third one in the hands of middle managers (41.7%). Shale (1994) described the activities of seven clans in Hong Kong and indicated that a few decades of neckbreak growth have helped a handful of entrepreneurs take control of large chunks of Asia' economy and in due course, pass them on to their families. Smaller companies have a substantially higher chance of being family owned. It may very well be that many of the listed companies in Hong Kong are family-held companies in which case key financial positions would likely be occupied

by individuals related to the major shareholders. Hence, we have results that show these control mechanisms are adopted by our sample companies in Hong Kong.

As indicated in the previous section, only one of the 59 respondents provided some comments. The view that the best control mechanism is self-discipline as the highest level of ethical control is dependent on personality and professionalism of key staff is not contradictory to Gandz and Bird (1989) in that model behaviour must be exhibited constantly by immediate superiors in building ethical organizations. Lee and Yoshihara (1997) also cited this as most important in improving ethical standards. With no respondents disagreeing with the preamble in the questionnaire on what ethics management is all about, one may assume that the responding companies agree with the academics' viewpoint.

There are two possible interpretations to the results of the survey. One is that since there is a much lower responding rate in Hong Kong (9.3%) than in Canada (57%), those that have not responded may not have any ethics control mechanisms in place. If this assumption holds, then over 92% of the listed companies would answer "no" to all questions if they were forced to complete the questionnaire. This suggests that a substantially lower percentage of companies (less than 8% of all companies surveyed) have ethics control mechanisms in comparison with Canada (28% of companies surveyed).

When assuming that non-response is due primarily to Hong Kong work pressure, the results show a substantially higher percentage of responding companies having one of the seven mechanisms in place (83.1% versus 49%) as reported under the first paragraph of this section.

The survey shows that corporate governance is the most commonly used mechanism in Hong Kong but not in Canada. However, since the three most commonly used mechanisms in Canada, namely code of ethics, whistle-blowing channels and employee training in ethics are also commonly used in Hong Kong, one therefore cannot conclude from this study that cultural differences between Hong Kong and Canada dictate the probability that companies' views towards management ethics would be different, as there

TABLE I
Surveyed results

	Yes (%)	No (%)	Z
Code of ethics	35 (59.3)	24 (40.7)	1.429**
Whistle-blowing channels	26 (44.1)	33 (55.9)	-0.906
Ethics reward system	5 (8.5)	54 (91.5)	-6.375
Ethics committee	9 (15.3)	50 (84.7)	-5.338
Judiciary board	3 (5.0)	56 (95.0)	-6.913
Employee training in ethics	26 (44.0)	33 (56.0)	-0.922
Corporate governance	38 (64.4)	21 (35.6)	2.218*
<i>Management Accountants' Involvement</i>			
<i>Code of ethics</i>			
Develop and/or review the code	30 (50.9)	29 (49.1)	0.138
Enforcement ranging from setting good examples to policing transactions	26 (44.1)	33 (55.9)	-0.906
Serve as advisor by suggesting consequences and prescribing corrective actions	24 (40.7)	35 (59.3)	-1.429
<i>Whistle-blowing involvement</i>			
Report awareness of suspected unethical behaviour	26 (44.1)	33 (55.9)	-0.906
Serve as sounding board for possible conflicts	21 (35.6)	38 (64.4)	-2.212
<i>Employee training in ethics</i>			
Provide training to Finance staff highlighting integrity, ethical values and competence	18 (30.5)	41 (69.5)	-2.995
Provide informal reminders and training regarding the existence and understanding of company policies and code of ethics	28 (47.5)	31 (52.5)	-0.384

** significant at 10% level of significance.

* significant at 5% level of significance.

is a high degree of commonality between the two locations in terms of the types of ethics control mechanisms used. This phenomenon can be reinforced by the fact that only one out of the 59 responding companies presented a comment on management ethics.

It is interesting to note that corporate governance is the most commonly used mechanism in the survey. This is an overall concept that is difficult to pinpoint and could mean different practices in different companies. Some may interpret the term as adherence to prevailing organizational culture, reflecting the ethical beliefs, personalities and professionalism of senior management

as in the case of family-held companies which are common in Hong Kong. This was also reflected in the one and only comment on management ethics in the questionnaire. It is also conceivable that smaller listed companies with no formal ethics control mechanisms in place, may use corporate governance as a catch-all in response to the generality of the term. Even if this were the case, it should not significantly impact on the results of the study as the commonly used mechanisms and the unpopular ones were largely the same in both locations.

Future research

Further investigation into the interpretations of corporate governance among the 38 companies (64.4%) that indicated “yes” to that particular ethics control mechanism is warranted and whether the practice of corporate governance by these companies serves as an effective mean for achieving sound ethical behaviour within these companies also needs to be determined. The managerial implication here is that if there is common understanding as to the usage of a control mechanism, its managerial practice should be reviewed for possible uniformity in order that maximum effectiveness can be achieved.

Since Hong Kong based companies may have a different organizational culture than that of China enterprises and China-affiliated companies, it would be worthwhile to single out the latter two categories to see if the results of the survey would be any different in these cases. If so, methods in dealing with such companies would have to be adjusted.

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Appendix

Questionnaire

It is widely believed among academics that ethically speaking, companies have a responsibility to the society as a whole in addition to having the responsibility to stockholders and employees. Thus, organizational ethics goes far beyond avoiding illegal practices and/or abiding by a code of ethics. Ethics management in a company therefore, involves management defining and giving life to the organization's guiding values, creating an environment that supports ethically sound behaviour and instilling a sense of shared responsibility among employees.

1. Based on the aforementioned, indicate which of the following type of ethics control mechanism your company has in place:

Code of ethics	Yes _____	No _____
Whistle-blowing channels	Yes _____	No _____
Ethics reward system	Yes _____	No _____
Ethics committee	Yes _____	No _____
Judiciary board	Yes _____	No _____
Employee training in ethics	Yes _____	No _____
Corporate governance	Yes _____	No _____

2. If your answer to any of the first two ethics control mechanisms and to “employee training in ethics” mentioned in 1. above is yes, indicate whether the Finance Director/Chief Financial Officer or his/her delegate(s) is involved in the following:

Code of ethics

Develop and/or review the code	Yes _____	No _____
Enforcement ranging from setting good examples to policing transactions	Yes _____	No _____
Serve as advisor by suggesting consequences and prescribing corrective actions	Yes _____	No _____

Whistle-blowing involvement

Report awareness of suspected unethical behaviour	Yes _____	No _____
Serve as sounding board for possible conflicts	Yes _____	No _____

Employee training in ethics

Provide training to Finance staff highlighting integrity, ethical values and competence	Yes _____	No _____
Provide informal reminders and training regarding the existence and understanding of company policies and code of ethics	Yes _____	No _____

3. Please provide comments if any, that you have towards management ethics and/or ethics control mechanisms. Comments can be written on the reverse of this sheet or on a separate sheet.

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