

**20 Risk &
Sustainability
Tactics That Halve
Risks, Improve
Impact, & Deliver
Value**

Where we're at

Strap in; this is the bleak bit where I cycle through all the things that are (or could) go wrong. But bear with me. We'll get to some solutions shortly!

Mid-market firms, scale-ups, and SMEs (collectively, and perhaps clumsily, "you") face expanding risks from many directions - ESG expectations may be the latest, but they are far from the only challenge. Persistent vulnerabilities include supply chain disruptions, economic instability, competitive pressures, technology gaps, inadequate safeguards against fraud and corruption, lack of business continuity planning, and more.

Research shows that 58% of SMEs admit to a limited understanding of risks they may face, and 72% do not have documented mitigation strategies in place. Common vulnerabilities include:

- Fraud prevention controls and cybersecurity to guard finances and data
- Oversight processes to monitor ethics and compliance violations
- Resilience planning to withstand interruptions from disasters, conflicts or infrastructure breakdowns
- Responsible innovation principles to deploy emerging technologies safely
- Preparedness to adapt to shifting consumer behaviours, markets, or regulations, especially around sustainability

While enforcement remains uneven, expectations are reaching an inflexion point. As stakeholder expectations rise and volatility increases, inaction could turn into an existential threat.

What's coming

- Technology: AI, automation, IoT, AR/VR, cryptography, and biotech hold enormous promise but have limited safeguards. Catastrophic cyber incidents could paralyse operations for weeks.
- Economies: Pandemic aftershocks, inflation, rising interest rates, supply bottlenecks, and conflict fuel uncertainty while China's growth falters. Few organisations' financial plans account for massive swings.
- Governance: Between 2018 and 2022, regulators levied over \$10B in fines for anti-corruption and fraud in the UK alone. Expect expanded prosecutions down supply chains.
- Society: Younger generations and diverse communities demand more accountable leadership. Social media backlash, boycotts, and divestment campaigns against perceived governance failures represent prime threats.
- Climate: Extreme weather disruption, resource usage and scarcity, ecosystem stress, and swelling climate migration will strain infrastructure and global stability. Most firms lack future-proofing.
- Supply Chains: Political tensions and climate change drive commodity volatility. Pandemics revealed brittle logistics. Inventory buffers may soon prove inadequate safety nets.

The complexities across these risk areas create compound - overwhelming unprepared organisations.

How things will change

As risks converge, we get the law of unintended consequences. Also called “second-order effects.” In plain speak, that’s when 🤯 really hits the fan.

Estimating the unintended consequences of multiple risks would take a book. Instead, I’ll pick a few severe but plausible examples to make the point:

- Nationalisation of critical facilities due to expanded domestic production laws in reaction to shortages.
- Cancelling of operating permits after overlooked workforce (and local community) tensions ignite protests at foreign facilities.
- Credit downgrades and liquidity crises due to undetected fraud or numbers manipulated to show stability.
- Customers defect post-scandal if sustainability and ethics failings are handled opaquely rather than with accountability.
- Cyber extortion paralyses production capacity or turns off automated safety processes.
- Vital rare earth minerals or microchip imports severed from trade disputes.

However, chaos sparks openings, too, as reactive competitors falter. Those of you prepared to handle ambiguity can capitalise on the following:

- Gaining talent and partnerships deserted by backward-looking organisations
- Achieving influence in rebuilding more ethical and transparent supply chains
- Unlocking innovation from assets stranded by short-sighted incumbents
- Channelling purpose and sustainability to differentiate brands amidst the turmoil
- Delivering in-demand skills training to underemployed workforces

The deciding factor between risk and opportunity starts with internal readiness to confront change before the tide arrives.

The road ahead

The near-term promises even greater turbulence than the past decade's upheaval. But by bracing operations today for extreme risks reasonably likely in the next 2-5 years, you can sustain a competitive advantage no matter what disruption lurks.

Building strategic resilience against known threats and unknown volatility creates strength for when crises inevitably strike. Those of you holding themselves to higher standards also encourage customers, employees, and supply chain partners to work collectively towards a more ethical, transparent, and sustainable future.

Section by section, year by year, tomorrow's leading organisations can deliberately shape operations to shine through whatever storms may come, proving that good business and good global citizenship are no longer mutually exclusive.



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Top 20 Tips to Survive and Thrive

The leaders poised to thrive through mounting uncertainty realise ethical reflexes now matter more than perfect plans. Rather than fixate on estimating probability (a notoriously tricky proposition), they focus on harnessing risk and embracing sustainability.

We moved into a new home in the winter of 2022/23. The house sits towards the bottom of a sloping garden. Above the slope are two fields formerly used for monoculture arable farming - decimated soil quality. When storms came, water flowed off the hard clay compacted soil, potentially threatening the house. In risk-speak, "high threat". The building has good damp coursing and drainage ("effective controls"). We could have estimated the amount of rain that would cause a threat to the home and invested in sandbags or something similar ("worst case scenario risk mitigation"). That's traditional risk and sustainability management - estimation, mitigation, and "avoidance of harm."

But we're creating a small homestead. Water is to be harnessed, not avoided. By observing flow, and then digging mini-ponds and channels across the property and excavating a larger water capture area, we collected water to use in dry periods. These steps and water retention systems around the property now mean we welcome storms.

Risk is not always to be 'avoided,' and sustainability does not need to start and end with reduction (consumption, energy, waste, etc.). Don't get me wrong; both are important. However, as a starting point, a defensive posture, seeking to avoid, minimise, reduce, etc., is not harnessing the strategic power and opportunity risk and sustainability present.

The leaders who will benefit from our changing times understand risk and sustainability enable renewal rather than just enforcing rigid rules. They create springboards to leap ahead of threats rather than just prevent backsliding against them. For organisations embracing flexibility, the future remains filled with possibility.

Now, let's dig into an eclectic collection of 20 top risk and sustainability management tips I've observed over the past two and a half decades.

3-D Risk & Sustainability Analysis

When most folks – especially those paying the big accounting and law firms a fortune – get an assessment, it's utter crap. It's a glorified checklist focused on what you have, not what you do, where, and how you do it. Let me give an example by peeking into a fridge.

Have you bought something virtuous and healthy (spinach seems common) and then let it rot? We all do this. We also buy items we need once and then linger for months, sometimes years. That time you needed one spice or sauce for a tagine/ramen/bake-off, etc.

The fridge and eclectic condiment cupboard is a classic assessment. We (or an expensive consultant) list everything we have, hoping that will give us an idea of priorities, sustainability, and risks to our health. A proper assessment lives across three domains.



1) External Context


If you have ungodly things like quinoa in your kitchen, and we score that as “low risk” to health, how might your activities away from the kitchen alter this? Let’s say you’re a deep-sea diver, smoker, and regular drinker, and your hobbies include rock climbing and MMA. Suddenly, a “low” score for your health risk looks hopeful, at best.

In organisational terms, we need to ask:

1. What do you do? An aid organisation specialising in reaching conflict victims faces a wholly different basket of considerations than a fintech firm providing microfinance. What you have, by way of frameworks or controls, is largely irrelevant until it’s paired against what you do.
2. Where do you do it? Syria or Sweden. You get the idea.
3. How do you do what you do? What’s the route to market, reliance on partners, error tolerance, frequency and value of sales, etc? Ethical sourcing? Supply chain insight? You can quickly see how these variables can significantly alter your risk profile.
4. When do you do most of your business? If you rely on seasons, tourists, harvests, and so on, we must consider these too.
5. Why do you do it this way? If we understand your why, we often get (quickly) to risk red lines you cannot cross. For instance, if your brand is built on “cruelty-free,” we need to know a LOT about your suppliers.

Operating model 45% 5/11

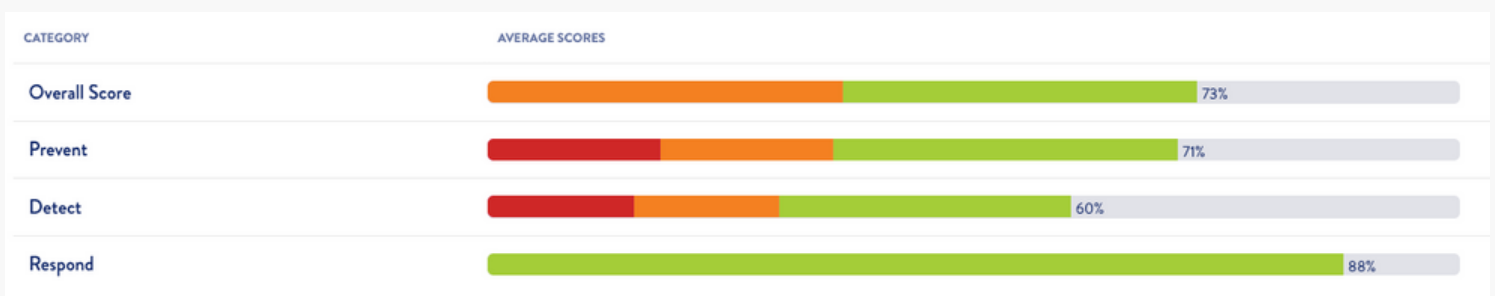
NO. 	QUESTION 	ANSWERS 
1	We have clear visibility of our supply chain (inputs, people, processes).	Yes  8s
2	Giving or receiving gifts, hospitality, or entertainment is rare.	Agree  5s
3	We are not involved in any government contracts.	False  4s
4	We do not have to deal with government licensing or permitting agencies regularly.	Yay, that's us!  9s
5	We do not use intermediaries to interact with government agencies, win business or handle customers.	Disagree  10s
6	We are involved in transactions to/from offshore (tax haven) locations.	Routinely  6s
7	We do not make political donations or lobby political bodies.	True  4s

If you want to test that out, the snapshot  is from a FREE (and, therefore, lite) tool to get you thinking about the operating context (external conditions beyond your control, where you work). [Click here](#) to give it a go.

2) Internal Implementation

Whatever you have in your metaphorical fridge is meaningless unless we know how you use it. There’s a difference between having chicken fillets and cooking them well enough to avoid salmonella risks. Just as there’s a difference between sourcing organic products, or not.

1. Measure maturity – understanding how well people understand how to use all the controls you have, correctly.
2. Consider usability – in 2013, I was on a job in rural Cambodia with no laptop and got sent an urgent cyber alert email by my employer; it didn’t display on a Blackberry. Ensure your controls and communications work across the whole organisation.
3. Measure user experience – ask people if it makes sense, is helpful, and does the job. We’ve all muted the preachy training video and guessed at the multiple choice “quiz” until we passed – that training failed.
4. Get feedback – creating content (especially for risk) can be brutally dull. Rather than pontificating blindfolded, get input from people on what would help. Often, a one-page cheat sheet will go x10 more than 45 minutes of dreary training (it also costs a fraction).



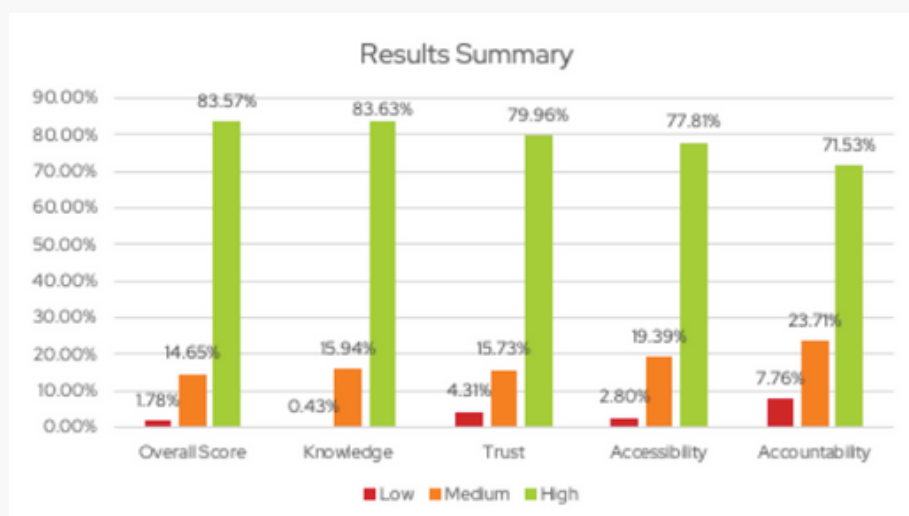
If you’re ready to test this out, why not try [this FREE quiz](#) on your compliance maturity? If you feel courageous, assess how well you implement risk management, [here](#).

3) Culture Eats Controls

Back to that fridge and the bag of spinach developing a culture and biohazard credentials. Ethics is the gap between our intentions (in our head) and the observed actions (what others see). We must understand the perception gap - between our intentions and others' reality.

1. Knowledge - do people know what to do, who to ask, how to get help, and understand your sustainability and risk content?
2. Accessibility - if they know where to go (for help or resources), can they? Are managers and leaders ready and willing to listen to comments or concerns? Are you reaching people in the field or on the shop floor?
3. Accountability - are standards followed, is everyone equal under (your) laws, and are incentives aligned with sustainable realities?
4. Trust - if people raise their hand, voice, or view, how is that treated (honestly)? Are cases appropriately investigated, and are those raising concerns protected?

This work has become my bread and butter because it typically takes 3-5mins of your employees' time and saves thousands (if not more). Why? Because we now know who (department, location, seniority) needs what support. No more developing policies, guides, training, and communications in a void, with no one and everyone in mind.



[Here's a simple quiz to test the theory, and here's what the output should look like.](#)

Sustainability and the Acronym Police

Barely a month passes without another risk acronym to bamboozle us. GDPR, UKBA, ESG, and R2D2 (checking you're awake) have been with us for a while now. But look out for pithily-titled ones like EUCSDDD, "the EU corporate sustainability due diligence directive." Rather than delve into every bit of legislation, not all of which is relevant, let's look at the general shift.

Environmental Factors

Firms influence climate change through greenhouse gas emissions (another acronym, GHG), triggering stakeholder reactions. Climate risk causes physical damage. In response, organisations look to tech but face transition risks as regulatory/market changes impact revenues. Beyond GHGs, particulate emissions, water pollution (and conservation), wider pollutants, and waste disposal attract increasing stakeholder attention. Organisations increasingly need to minimise the downsides of their activities' input and output (including the resources they consume).

Social Factors

How you treat your people (and the broader community) is no longer "a private matter." Social media and changing demographics have changed the game. "Treat" is a big word in this context and will extend (depending on what you do) to inequality, consent, land use and access, accidents, health, diversity, engagement, transparency, and benefits.

Governance Factors

Competence and integrity at the top have become a topic of increased scrutiny. Crimes that still get called "white collar" as if to add a bit of levity, kill. Corruption, anti-competitive practices, fraud (including dodgy reporting/accounting), and cyber issues can ruin lives. They also undermine trust, harm revenue, ramp up (legal and other) costs, and reduce competitiveness.

The upsides

Contending with these three horsemen may seem overwhelming. It is if you treat all as equally relevant to what you do (which they're not). Before we look at "how," why might you want to?

1. Customer segments and demand is growing for brands that take this stuff seriously
2. The authorities are more likely to grant licenses/access and leave you alone
3. Innovations (can) cut costs
4. Doing better mitigates legal/regulatory risk
5. With changing workforce competition, you can attract/retain employees more easily

4) Stick To What You Know

It’s hard to be all things to all people. Ask yourselves, honestly, what is our organisation about? If you’re deeply embedded in your local community and (think) you understand their needs well, start there. How might you begin this process? Look at the bingo below.

The bingo followed a review of the values of the world’s largest organisations. You’ll see a staggering amount of homogeneity. Unsurprisingly, stakeholders increasingly view this as trite.

Re-examine your values and ask your people (anonymously) which ones resonate (or not). Ask for alternatives. Then, work together to describe what those values look like in action. A word like “integrity” is meaningless without context, yet almost all big companies use it. Integrity for a clothing manufacturer might include commitments that there is no human suffering in the textiles in your supply chain. For an online farm-to-table retailer, it will (likely) focus more on environmental stewardship, organic credentials, and product safety.

But what about all those pesky questions from investors, lenders, clients, and others that relate to stuff we don’t fully understand and are non-core to what we do? Read on...

**CORPORATE
VALUES
BINGO**
Anything look familiar?

PASSION	OWNERSHIP	RESPECT	VALUE	HONESTY
ENVIRONMENT	DIVERSITY	INTEGRITY	ACCOUNTABILITY	SOLUTIONS
FAIRNESS	QUALITY	INNOVATION	CLIENT-FOCUSED	PERFORMANCE
LONG-TERM	TEAMWORK	TRANSPARENT	FUN	COMMITTED
COLLABORATIVE	INCLUSION	LEARNING	TRUSTWORTHY	EXCELLENCE

5) ...When To Comply

The matrix below is a summary, not a solution, but it helps to get started. The topics that typically cause the most consternation are ones where we (initially appear to) have low influence and/or complex issues. Heading back to that fridge, let's use a couple of examples:

1. You're unsure how to calibrate the nature loss (and ESG metric) from your proposed affordable housing development on disused farmland. That is a complex issue where you have high influence. If you don't have experts with experience with the International Union for Conservation of Nature Red List of Threatened Species (few of us do!), that's one to outsource. However, you may be able to estimate in-house water consumption (from past project estimations and costs), and it's probably in your best interest to minimise this (cost) and potentially include sustainable water capture provisions in the planning process.
2. You're asked about supply chain inputs in your electronic manufacturing and assembly operations. The questionnaire is not satisfied that your supplier of semiconductors is in Taiwan. They want to know about the "rare earths" (worker treatment, conflict-free, etc.). If you're a UK mid-market firm, you'll not have much influence over a Taiwanese behemoth. In this instance, it's a low-influence but complex issue. Seeking alternatives for an essential component will take time (reliable semiconductor manufacturers aren't two a penny). In this instance, you may wish to...



6) ...Resist

Resisting makes sense when you have no or few alternatives, like the example above. That doesn't mean you stubbornly refuse to change. It's about taking charge of the discussion and explaining what can reasonably be done. For instance, if you can set a timeline for a transition to a semiconductor supplier with audited evidence that the mineral and metal inputs are sourced from accredited mines in well-governed places (I know, not yet).

Resistance also makes sense when:

1. The issue is not one you can square with your values. For instance, if a pressure group objects to your existence (oil & gas services, mining, livestock agriculture, etc.), you may wish to defend your position with data (i.e., the challenges replacing myriad everyday items that currently use petroleum inputs). But offset the defence with evidence of how you benefit your stakeholders (or how you're changing, e.g., investments in petroleum product alternatives).
2. You can't solve this alone. For example, if you want to use greener energy sources but there are impediments to doing so (local opposition to wind turbines or photovoltaic panels). Creating the discussion and dialogue is better than fudging a response.
3. The legislation or requirement is poorly conceived. For instance, reporting on fair remuneration down your supply chain may be challenging if that supply chain includes places where a "fair" living wage is disputed (poor tax collection, wealth held in gold, a lack of governmental data on the citizens, groups excluded from census equivalents, migrant labour). In those cases, you will likely want to show willingness and explain the challenges.

We don't all have to go along with conventional thinking. If you want to buck the trend, do it. Authenticity is better than tongue-in-cheek conformity. Just be very sure about why you're doing it and how solid your data is.

7) Talk More

Steps 4, 5, and 6 may seem daunting. They are. But when you talk more, you get the insights you're lacking. The forums to talk may include industry associations, chambers of commerce, subject-specific forums (e.g., around sustainability), and consultation panels. Why would you even want to get involved in that potential time-suck?

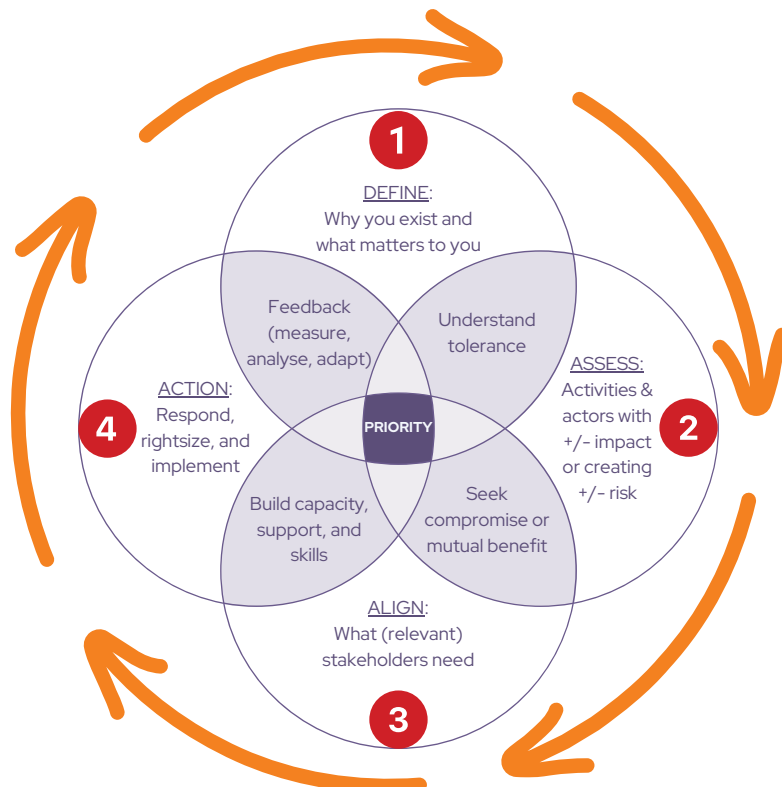
1. One person's waste is another's gold. An ESG (or corporate responsibility) headache for your neighbour might be a blessing to you or vice versa.
2. It's easier to work with and not against people - especially local stakeholders (sometimes termed "social performance") - you break down barriers and increase license. I've seen highly controversial projects (e.g., smelting facilities) get communities onside by listening.
3. Not trying (talking) is hard to defend when you get flack.
4. Many minds may cause chaos but can also develop solutions, pushing things from your "low influence" and "complex" boxes to somewhere more manageable.
5. It's hard to affect change from the sidelines.

To summarise, sustainability is your organisation's Ikigai. This concept, borrowed from Japanese philosophy (mainly to sell self-help books after we got bored of Hygge), advocates that we should find:

1. What we're good at
2. What we love
3. What the world needs
4. What we can get paid for

With some minor tweaking, it works very well for organisations; we must first ask ourselves:

1. Do we have the capacity to change this?
2. Does this align with who we are (values, mission, strategy)?
3. Is this what our stakeholders need (many a CSR or sustainability initiative has failed in the gap between perceptions of community needs and reality)?
4. What (in)actions create +/- impact or risk in what we do?



Third-Party Management

“Never in the field of corporate management has so much been done for so little value by so many to help so few.”

That’s my view of traditional third-party management - due diligence, risk ranking, filling out endless forms, etc.

How might we do better?

Which of the following third- party violations are you most concerned about?



8) Stop Adding Forms

I recently worked with a mid-market healthcare firm, where some forms their suppliers received cumulatively totalled 100+ pages. IT had one (information security, you see), procurement another (round pegs into square holes), compliance another, legal, HSE... you get the picture.

It's a relatable problem. Who wants to oversee all forms your third-parties (suppliers, intermediaries, agents, consultants, distributors, partners, etc.) complete?

The problems are evident. Anyone foolhardy enough to try and complete the Magna Carta will hate you. It's not an excellent premise for collaborative business relations. Then someone on your end has to read it - even more pain. That's the best case. The other alternatives include them fudging or skimming the forms and you either ignoring them (creating risks of appointing a fraudulent or underqualified entity), contesting (more paperwork and pain for both parties), or dumping them (risking excluding someone very good at what they do, but baffled by irrelevant questions).

A simple solution: stop... collaborate and listen. Then what?

THIRD-PARTY RED FLAGS				
TOPIC	ABAC	AML / CTF	SANCTIONS	HUMAN RIGHTS
Unclear why they're being considered/proposed	✗	✗	✗	✗
Unclear beneficial ownership / complex offshore structures	✗	✗	✗	?
Lack of experience, resources or staff for proposed engagement	✗	✗	✗	?
Relies heavily on government connections	✗	✗	?	?
Unable to adequately explain supply chain inputs	?	✗	✗	✗
Request for unusual transaction terms / routes	✗	✗	✗	✗
Relies on outsourcing (e.g. subcontractors)	✗	□	✗	✗
Appears 'intangible' (little website/physical presence)	✗	✗	✗	✗
Unable or unwilling to disclose origins of wealth	✗	✗	✗	?
Refuses to accept compliance clauses in contract	✗	✗	✗	✗

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9) Use Logic (for them)

You can build a sensible questionnaire with logic on software that costs less than a cup of coffee (per working day). It's not a negligible investment but a sensible mitigation of the opportunity cost of doing it the 100+ pages way. The logic should factor in the following:

1. What they do (for you) - different activities confer different risks (a provider of chemicals is not the same proposition as an outsourced IT service provider).
2. The value of what they do - go beyond pure numbers and think more laterally about things like criticality, reputational exposure (e.g., they represent you in the market), and familiarity (how long it would take to pivot to another provider).
3. Where and how they do it - high-risk markets and business models (e.g., intermediaries and agents who deal with challenging stakeholders but don't themselves have skin in the game).

You might be thinking, who has this information? Well, whoever is looking to appoint the third-party should be able to answer a) and b). With those answers, you can reduce the questions you ask them to something more manageable. For example, with that outsourced IT provider, you'll want to ask questions about data protection, cybersecurity, and broader information security. The depth of these questions will depend on b) - ongoing management of your hardware and software differs significantly from a three-month contract to support the roll-out of a new inventory management system.

There are more considerations, but hopefully, you're getting the idea.



10) Triage & Triggers

No system third-party risk-ranking system is perfect. You'll get false positives. But what is more problematic is missing the red flags.

Using the logic steps outlined above (and there is more where that came from), we can shrink our risk analysis of the third-party to something more proportionate. How? Well, you will have asked them targeted questions, and if their responses (or disclosures) are insufficient, unclear, or raise issues, then more digging is needed. Most of the time that won't be the case. But what about things they don't disclose?

Back in 2010, I was working on a project in Indonesia, where many people go by one name. Some just have one name. Others, like a long-serving prime minister, "Jokowi", abbreviated a longer name, Joko Widodo. To further complicate, you can choose which name(s) you put on websites, corporate filings, and more. Deep in hidden corporate disclosures, I saw a name that looked at once familiar and strange. I asked an Indonesian colleague, and they said, "Oh, that's an issue; he was a former cabinet minister, kicked out for corruption."

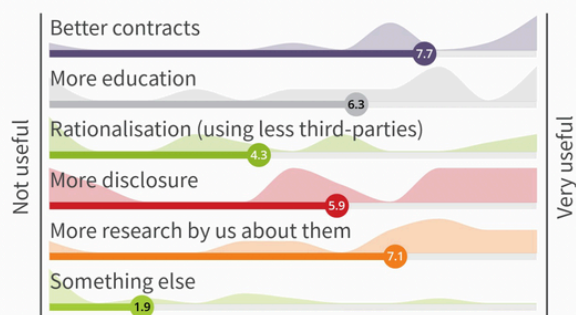
You might not always have colleagues who can contextualise things that don't look quite right. In those cases, you have a few choices (depending on the nature of the proposed relationship and the extent of your leverage over the third-party):

1. Ask them for more information.
2. Move on (if their disclosure raises more questions than answers, and you have alternatives).
3. Protect yourselves (e.g., contractual safeguards, ringfencing access, etc.).

What about doing more digging? That's usually called due diligence (DD), sometimes KYC (know your customer), or IDD (integrity DD).

This was the priority steps for a mid-market healthcare company that had rapidly expanded and increased supplier base considerably. It will be different for you, but we asked those needing the services (not procurement) what they needed to make better and more sustainable decisions.

How should we reduce third-party risk

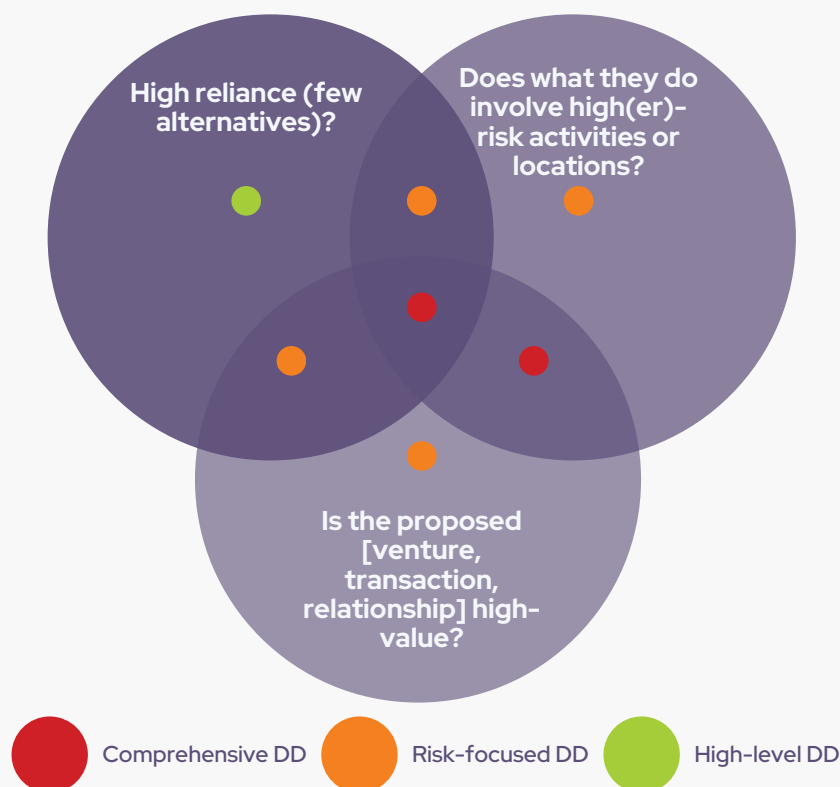


11) Don't Be Daunted By DD

DD takes time and costs money (outsourced or opportunity cost if done in-house). That doesn't mean you don't do it. Do it properly, where needed. How do you know where it's needed? The graphic below is a necessary simplification, but it should give you a general idea of when DD is required and what sort of DD is best. But what does each of those involve?

1. High-level DD: DD designed to ensure the partner has no significant red flags (e.g., legal issues, disputes, scandals, negative media, etc.).
2. Risk-focused DD: DD focused on the risk issues related to the relationship. If you are reliant on the partner, in what way? For instance, a tax advisor interacting with government agencies would merit a DD scope focused on political connections, regulatory issues, corruption, and appropriate licensing.
3. Comprehensive DD includes all of the above plus track record, reputation, (potential) regulatory exposure, financials, management, and connections.

Does comprehensive DD always have to be outsourced? No. Suppose you can speak the language(s) of the third party, have access to records in that country (which is increasingly possible), and have some people you can talk to (references, colleagues, contacts). In that case, you'll need some training, but it's achievable.



12) Create Your Spreadsheet

What about all the questions you might field? Create a spreadsheet (or something fancier if you have the existing tech - tools like Obsidian are helpful with their tagging features). I had to. On one tab, I labelled it "Compliance"; on the other, "Reasons to believe."

Compliance was where I stuck answers to questions we get that are driven by box-ticking. It starts with the banalities (date of incorporation, registration number, bank name and location, etc.) before progressing to "have you ever..." questions. You know, have you ever been involved in litigation or defenestrated a colleague for whistling too positively early in the morning?

These compliance questions are CYA (cover your ass/arse; more on that later). The forms they'll arrive in tend not to lend themselves to exploration of explanation; it's binary Y/N, with a box to explain any "Y" answers.

The "Reasons to believe" tab is where you can save the things you do because they're things you believe in. Your organisational Ikigai. Here, we include not just goodery (mentoring, charity, pro-bono) but the work we're doing about more systemic issues that matter to us - regeneration, travel, equity, and those areas we've chosen to focus on.

Most of the questions you'll be asked by lenders, investors, clients and partners will sit on the "Compliance" tab, and collating all the different questions you're asked in one place will help save a lot of time. Most DD forms you'll receive differ marginally.

The illustration shows a tilted spreadsheet or form with the following fields:

Entity name:	
Date	
Contact details	
Primary contact person	
Address	
Phone number	
Internet address	
Tax ID number	
Type of entity	
Date of establishment	

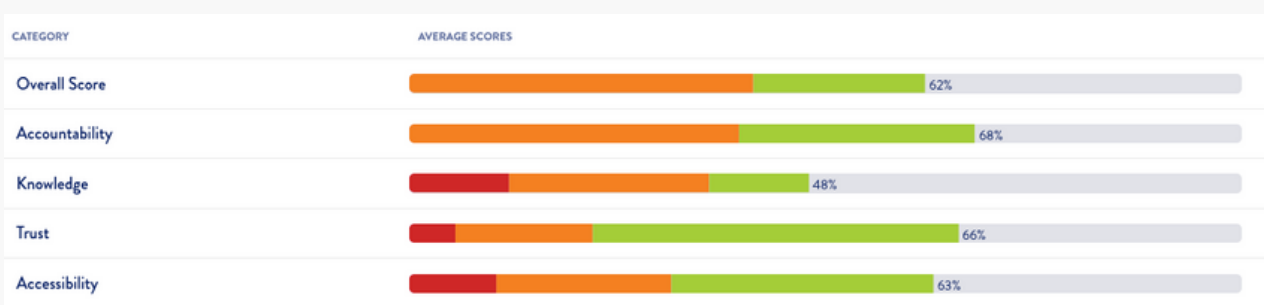
Mind Your Language

A few years back, we started doing integrity culture assessments. Pithy, I know. The thinking is/was that culture eats controls. Most of the hundreds of cases I investigated were not arch villains hatching nefarious plots. They made poor decisions, usually because of pressure (to hit targets, incentives, managers, etc.). In that setting, it seemed important to understand where people were most likely to deceive, override controls, create risk, or make poor choices.

The first iterations of the assessment overlapped considerably with psych safety. But that wasn't enough. The topics of this paper - corruption to climate - aren't always immediately apparent. Pysch safety analysis often focuses on more straightforward human interactions. We added components until we hit the current four. There's always a challenge making categories MECE (mutually exclusive, collectively exhaustive), but this works for now:

1. Knowledge - do we know what to do, where to go, expectations, how (not) to behave, etc.?
2. Access - can we access support, resources, leaders to own decisions, etc?
3. Accountability - are we all (equally) accountable? Do (in)actions have consequences?
4. Trust - can we disagree, say no, admit mistakes, speak up without fear of reprisal, trust the system, etc.?

With all the doomsaying in the media and endless cycles of corporate sleaze and scandal, I'd assumed the poorest scores would be around accountability and trust. I was wrong.



The average scores from a standardised survey we've been running for two years.

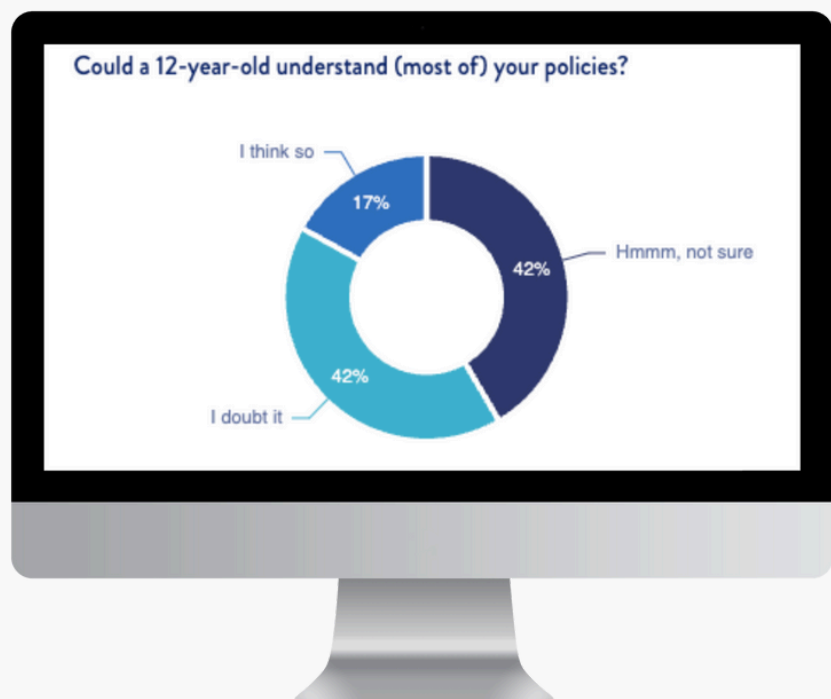
Mind Your Language (cont.)

Years later, we've conducted assessments across 10,000 people in 30+ organisations (sample of the output for one organisation [here](#)). Yes, the trust/accountability hunch paid off in some of them. But in many organisations, knowledge faired worse. I'd struggle to find trends that stood up to anything resembling the hellish standards for correlation in the algebra-gibberish that was a statistics course I took at university. However, scale-ups, inorganic growers, and rapidly expanding or internationalising firms might be one such group.

I don't know if that looks relatable to you, and the headline data is only a fraction of the value. The real gems come when we dig into each question and analyse it at the demographic level (function, seniority, location, etc.). Once here, we can (typically) save a LOT of time and money by meeting people's needs. Let's say your business development colleagues in Site C score poorly on questions about incentives being achievable ethically; we can action that insight just as we can assist the operations team in Warehouse B, who don't understand your messages on compliance.

Of all the questions we've asked, the 12-year-old test (responses below) is the starkest. Across all those people and organisations, policies and procedures remain about as user-friendly as a car manual written in Aramaic. Why does this matter? Most people, especially across internationalised organisations where they aren't working in their first language, read to a 12-year-old level, at very best.

So, what can we do?



13) CTA, Not CYA

In the first years of this business, I embarked on less of a learning curve, more of a learning slide down a mountain of smoldering thistles. As I wasted money, time, and hair, I learned about CTA - call to action. What action are you trying to elicit or initiate? A good piece of marketing doesn't leave you fumbling around trying to work out what to click, do, or how to respond.

CYA - cover your ass/arse - by contrast, is an exercise in showing your workings, sending everyone on anodyne and irrelevant compliance training so you can tick a box if the regulator ever asks. CTA and CYA are frequently opposed. To embed sustainability and manage risk, we need people who make taking (the right) action easy.

Back to the fridge. If our objective is to explain food expiry, we tend not to lead with a treatise on e-coli, where the product was packaged, or who might be most impacted. We keep it simple: use by date. Yet, in corporate messages, we often see the opposite. We explain corruption or climate change with lengthy explanations about legislation, origins, fines, and other (for the most part) irrelevances.



13) CTA, Not CYA (cont.)

I'm not suggesting all we need are soundbites. But not everyone needs to know everything. What procurement needs to know (or ask) about sustainable suppliers will differ from finance, for example.

On the platform we built (to simplify assessments and address any subsequent gaps), we uploaded 200+ pieces of content (policies, guides, training, checklists, etc.). The most downloaded are the distillations of complexity into cheat sheets or checklist forms. That doesn't mean you don't need substance behind that.

Think of your communications on risk, sustainability, and broader integrity issues like a good "Quick start guide" with a new product. Try to address the central questions, pain points, and priorities—the CTAs. Keep the longer-form product manual for those needing that level of knowledge or with more complex risks.



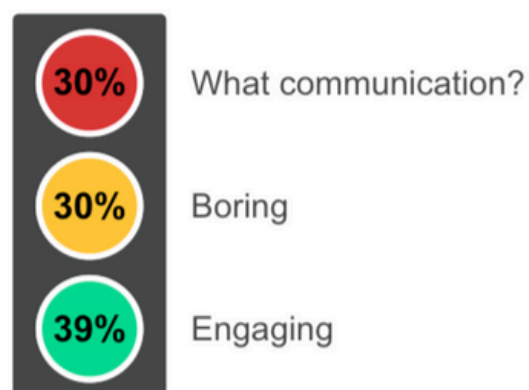
14) Beware Shiny Things

When faced with complexity, some of us may be sold the myth that the issue is with the delivery mechanism. The policy is dry; no one reads it. Therefore, we need to create a fun quiz. Maybe, but beware of gimmicks.

If I had a £/\$ for every time I heard someone argue that “gamification” was the answer... I’d have enough for a pretty nice meal. Gamification alone doesn’t help. I tried. I left my last role after 13 years, dealing primarily with quite traditional organisations. In my first few training sessions (for a smaller organisation in Vietnam), I was excited as I could use cool new gamification and quiz tools. The sessions bombed. I’d failed to pass the 12-year-old test and clarify the CTA.

Think about how people will use the knowledge, when, and where. Work backwards from there to develop content in a suitable medium. A poster reminding people of water conservation at the points where most water is wasted may be infinitely more powerful than an expensive 25-minute animated video with cartoonish animals looking thirsty on cracked savannas.

Communication in my organisation about sustainability and risk issues is...



Answers to a question I posed to 40 sustainability professionals in a session I ran as part of their sustainability-focused MBA; given many of them were the authors or the communications, how might their colleagues have responded...? 🤔

Speak-Up Not Down

If you're reading this, the chances are you're a leader (manager to executive). Now try and imagine you're not.

To manage risk and leverage sustainability, we need ideas from the other end of the organisation. Both risk and sustainability are dynamic. We require a constant flow of intelligence to ensure we're not caught off guard or missing opportunities. I'm not advocating an abdication of risk and sustainability responsibility to the frontline folks, but rather the system I saw (some) Japanese firms use while working there. The management will set the general direction and specify priority or no-go areas. These ideas trickle down, gathering feedback sent back up to inform strategy and action.

Why might this lead to better risk and sustainability outcomes?



15) Frontline Realities Must Lead

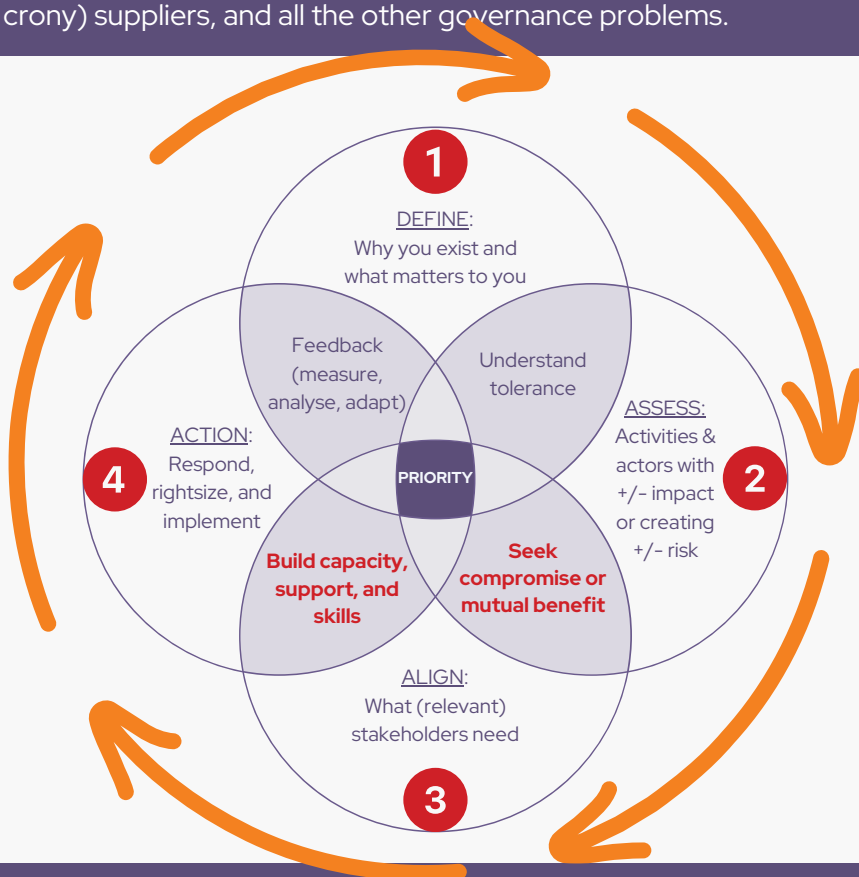
During 12 years in Asia, many multinational companies expected adherence to environmental and social performance standards that did not exist locally, and 'no-questions-asked' bonus-busting financial growth from their subsidiaries - 20% was not uncommon. To do that without cutting corners in some of the most politically, environmentally, bureaucratically, and socially complex countries is a fantasy.

To make that fantasy more plausible requires nuance. A construction and engineering company recognised this. We worked with them to balance the risks and opportunities within sub-markets - infrastructure, commercial real estate, government buildings, etc. - across their SE-Asian markets (five countries). For instance, let's say Country X is embarking on a donor-funded port-building splurge. That might sound quite appealing, but first, we must understand the political, security, social, environmental, corruption, and other key sustainability risks. After that analysis, the less sexy but more fast-paced and efficient commercial real estate sector might be more appealing.

In this context, sustainable (and ethical) 20% growth becomes more plausible. Pursuing the initially lucrative port-building contracts might not even have secured the 20% growth once you've factored in the problems. For starters, free prior and informed consent, dredging, community displacement, impacts on livelihoods, bribe requests, requirements to use substandard government-approved (i.e. crony) suppliers, and all the other governance problems.

Many risk and sustainability initiatives fail when good intentions meet operational reality. Focus on aligning your interests, skills, and capacity, with stakeholder needs.

I've seen people waste a fortune and go through hell because they failed to consider these two steps. It is the most effective risk mitigator and sustainability enhancer, without doubt.



15) Frontline Realities Must Lead (cont.)

How do we gather that information? The simple answer is to ask people. You may need to outsource the asking if it's an entirely new market. But for most business strategies, you have assets in place. Your frontline staff live the sustainability and risk realities. They know why environmental degradation continues despite a teeming hive of environmental inspectors. They understand why those unions aren't really unions (as you and I might recognise them) but political cudgels. They've experienced gender-based violence meated out on factory floors. You get the picture.

Once you have a set of questions rightsized to your organisation (see the [3D risk section](#)), setting more realistic, sustainable, and de-risked incentives becomes much easier. If you're thinking, "Yeah, but taking risks is how you secure high rewards." Sure. The right risks. Innovation, disruption, marketing, and all your other competitive advantages. Taking sustainability and integrity risks might lead to some quick wins, but the best case is you'll forever look over your shoulders. In the worst case, you trash a reputation and trust built over many years.

If you believe your people speak up and would tell you if they'd ever witnessed unethical, illegal, or otherwise unsustainable behaviour, don't be so sure.



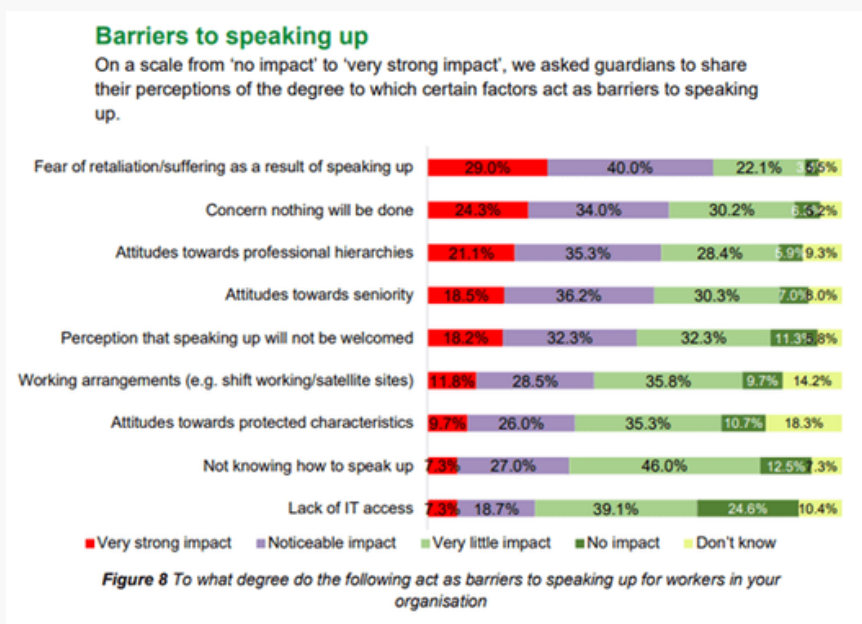
I asked an audience of hundreds of investigators - those charged with upholding standards - if they'd ever not spoken up about wrongdoing (90%+ admitted they'd kept silent at least once). I then asked why. The chart above summarises their responses.

16) Don't Call Us, We'll Call You

You won't be able to police all your employees. Middle managers – especially the jaded ones with cynical coffee mugs – often don't share your sustainability zeal. Most employees follow the direction of these managers. The mood in the middle can make or break your risk and sustainability agenda. You can do positive things here but I'm not here to talk HR.

You need a mechanism for people to speak up, specifically to sidestep or go above their manager. If that sounds like a snitch culture, get over it. Many of us, especially in subordinate positions, will shy away from confrontation or speaking truth to power. You can't always rely on brave souls standing up to dodgy teammates or bosses. Why? The data indicates that those who speak up suffer badly. They (usually) have very little to gain from raising their voice and, in doing so, act in the best interest of the organisation. Not providing alternate ways these people can help you avoid harm is, at best, neglectful.

Most organisations will have a speak-up framework. The most basic might be an email address. That's a start. But do people use these frameworks? Do they know they exist? Can they access them? Do they trust that their allegations will be treated seriously, kept confidential, and their anonymity preserved? If you don't know, look at the [Culture Eats Controls](#) section above.



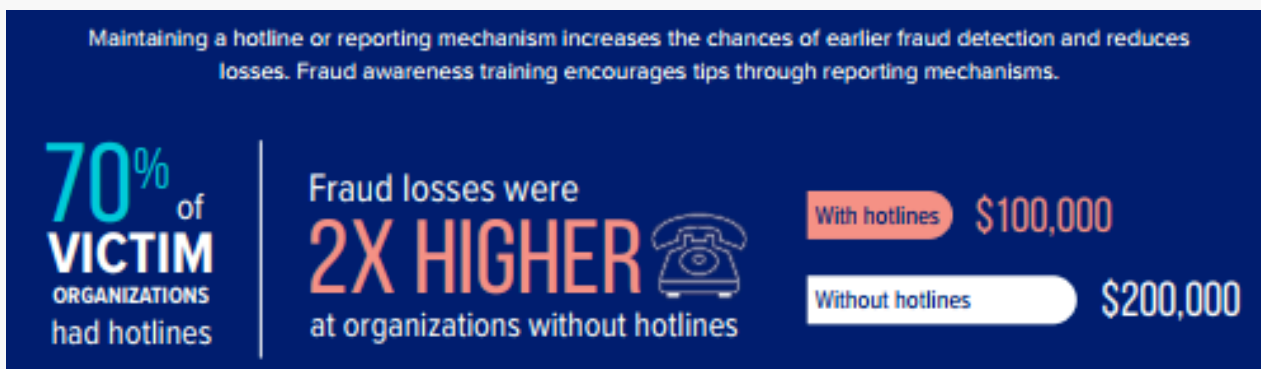
A 2023 survey by the UK's National Guardian's Office (who lead, train and support a network of Freedom to Speak Up Guardians in England) found the fear of retaliation is the number one barrier stopping employees from speaking up. Almost 70% cite fear of retaliation as having a "very strong" or "noticeable" impact.

16) Don't Call Us, We'll Call You (cont.)

A practical speak-up framework need not be complex or cost the earth; I built one in three hours using a web-based app generally used for surveys requiring branching and logic. The tool needs to work for your organisation. If most of your employees are overseas, providing a phone number wherever you're headquartered won't work—or buying a big, clunky web app that times out. Think of speaking up like customer service – you need to be available to your customers where, when, and how it's convenient.

You'll need to make a few more decisions. Who will have access (employees, contractors, suppliers, local community, etc.)? What happens after they raise an issue? You can't promise to solve every allegation in a specified timeframe, but you can set basic communication parameters (average response time, etc.).

Once the framework is working, you'll need a way to triage and prioritise the reports. This appears to be a lot of work. It can be, but it's still better than the alternative. Organisations with functional speak-up frameworks detect bad stuff earlier, which means the costs (and other impacts) are lower.



The [Association of Certified Fraud Examiners](#) run an annual survey of their 90,000+ members, asking us about investigations we've managed that year. The data above from that survey demonstrates the value of a speak-up framework from the perspective of reduced harm.

16) Don't Call Us, We'll Call You (cont.)

But what about the upsides, like making the organisation more sustainable? If you search "suggestion box" now, you'll be greeted with a chorus of blogs about why they're dead. These blog authors generally try to sell you virtual suggestion boxes, sometimes branded "continuous improvement systems." Urgh, okay. You'll quickly descend into arguments about the pros and cons of anonymous versus named suggestions - the former is harder to categorise/qualify and may include more moans and groans. The latter will deter some from coming forward, especially if their manager has rebuffed them. For instance, there is some data (ancient data) suggesting that "An [admittedly not very current] [2012 survey](#) found that while 93% of North American workers make suggestions to their bosses on a regular basis, only 39% of companies have formal processes in place to address these ideas in an open and transparent way."

The tool and parameters you choose to gather feedback will depend on you: what you do, where, how, and with whom (stakeholder demographics). Not gathering feedback to assess impact, risk, or crowdsource creative solutions will cost much more than gathering that data. If you're stuck, I'll happily [give you 30 minutes of my time](#), having worked across many models and frameworks.



Whatever you put in place, not everyone will use it. And that's useful. How...?

17) 80/20 Rule (Inverted)

During WW2, the US Navy started to map the flack and bullet holes on returning aircraft. The initial idea was to reinforce the perforated areas. Luckily, Abraham Wald, a mathematician, took over and corrected the [survivorship bias](#), explaining that this data was from returning planes. What of those who never made it back? Might the damage they sustained be on the areas without holes? They set to work reinforcing the intact areas on returning aircraft, improving survivability.

In your organisation, most people won't speak up (80% stay silent, and less than 20% might speak). That bold claim is not backed by science; it's my anecdotal experience. That's the bad news. The good news is that we stay silent differently. For instance, while the members of Department A - responsible for gathering resource consumption and emission data - may be reticent about admitting that the results are utter fabrication, other stakeholders in that process may be less encumbered.

There's another 80/20 rule we can more quickly analyse. If Departments C and D face proximate sustainability and risk pressures, why do 80% of suggestions or allegations come from C and only 20% from D? There could be many reasons. Maybe D is worse performing and facing redundancies, the bosses are feared, or it's a clique mistrustful of you, the leaders. Whatever the reason, it's valuable data. You now know where you have potential exposure and might need to think about reinforcing knowledge, access, accountability, and trust.



Look at what's not there, dig deeper.

Incentivise This

“Why should we be incentivised to do our jobs ethically?” We were surveying an electric vehicle component manufacturer. One of the questions was, “Are you incentivised to behave ethically?” There had been concerns that aggressive production and cost-reduction targets might create corner-cutting and sourcing from cheaper but non-approved suppliers (with sustainability – environmental and human – implications). Respondents to the survey could add comments to any question, and this question drew the most responses.

Back to that fridge. As a parent, bribing your child to finish the healthy meal you’ve prepared can be very tempting, promising something sweet and sinful. But what happens at the next meal?

We have a similar problem in sustainability and risk. For instance, should we reward people for recycling more? That may initially seem sensible, but if recycling is a behaviour you want as a given, what happens when they can’t recycle any more than they already are? Could they consume more resources to create more recycling? What about fraud? Numerous surveys from the Big 4 suggest that between 3%-5% of revenue in most organisations is lost to fraud. It’s a big problem. Should we reward departments for being less fraudulent than last year?

It seems absurd, and it is. And it isn’t. My son regularly comes home from school with stickers for not doing things he shouldn’t do. Bear with me. He’s proud of his “showing wisdom [and not kicking the person who snatched his space hopper]” sticker. Setting incentives for ‘positive’ things can definitely work, but incentives for not doing wrong are a more slippery slope.

We want our people to be committed to reducing our impact. But we may not want to offer bonuses for whoever does that most, as it’ll distort matters. We might instead reward the people who reduce impact despite challenging circumstances. For instance, if certain plastics are not readily recyclable in one area and a bright employee finds out that a nearby university is prototyping a new type of road-building material integrating that plastic, that’s to be commended. Another example I saw was in India, where a site manager had refused to acquiesce to a corrupt demand and was detained by dodgy cops for 24 hours. He was recognised by the country manager for going well beyond what was expected (denial of liberty) by his employer.

The reward is not immediately about money or some other obvious bonus in each instance. It’s recognition, face time with senior leaders, or a career development/skill acquisition opportunity. Make people proud to do the right thing; don’t bribe them.

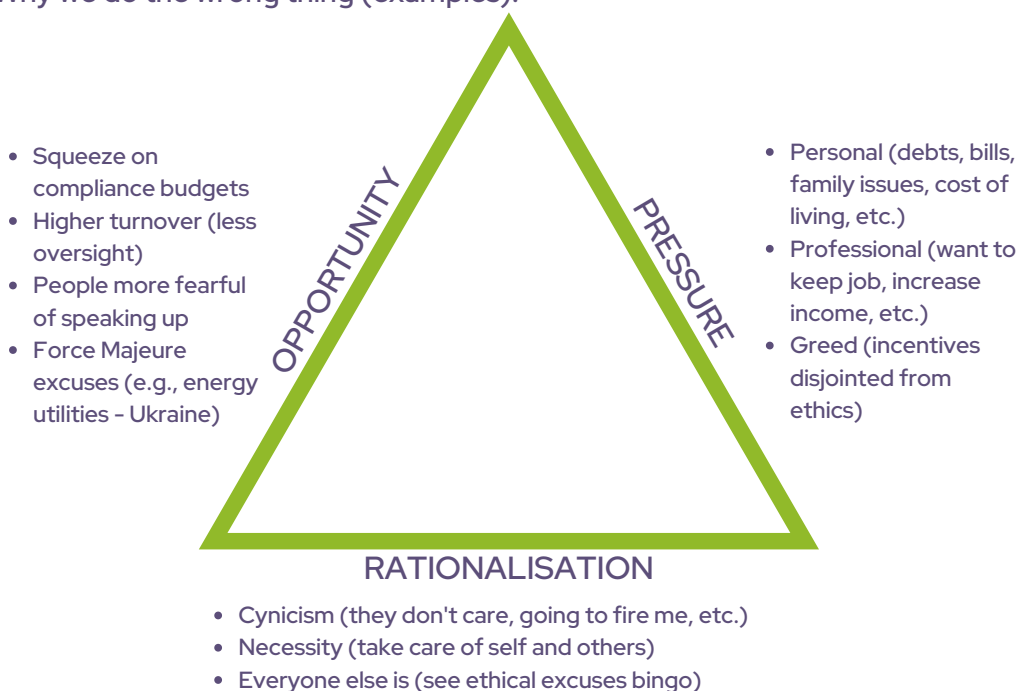
18) Discipline (Details) Matters

Now, we get to the cold business end of this paper. Things will go wrong. People make mistakes, demonstrate poor judgment, and a few intentionally do the wrong thing. That’s been my experience. In the past few years, I’ve provided guidance on 60+ investigative matters. In a small minority of cases, people intentionally did what they knew was wrong for personal benefit. The rest of the time it pressure, poor judgment, or a misguided notion that they were helping.

In that context, we need to have disciplinary frameworks that are consistent, fairly applied, but flexible. What the hell does that mean? I’ll give you two not-at-all hypotheticals (case studies):

1. A security manager is accused of harassing a junior female employee. There’s no physical evidence. None of his reports will talk. This issue only came to light when the female employee sent an email after she quit and she is now unreachable.
2. An interpreter in a high-risk country is asked to drive around visiting staff. That’s not his job, but he obliges. The interpreter faces not inconsiderable personal risk by working with foreigners (hated by many of his compatriots). You find out that he’s been taking the vehicles on long treks across the country on weekends and holidays to visit his kids. The company policy (and insurance) says the vehicles must be kept garaged and locked on your heavily guarded premises when not used for official business (in the city).

Why we do the wrong thing (examples):



18) Discipline (Details) Matters (cont.)

Okay, the two case studies are tricky, to make the point. In the first scenario, you don't have much of a case, even though the alleged violation is severe and has significant repercussions for your commitment to people. In the second instance, you could dismiss him if you provide evidence (e.g., a policy or contract the interpreter signed) that he knew not to take the vehicles for personal use. But what if you didn't explain to him the rules? What if you didn't check his license? What if you didn't notify the insurer? What if you consider your role in asking him to go above and beyond his allocated responsibilities? What if you consider seeing family reasonable?

Investigations get messy. Proving things isn't as easy as some TV shows suggest, and you can't (please don't) let the psycho in HR (there's always one) get their Jack Bauer torture routine going.

There's no neat solution. But the table below provides the components of a sound deterrent and preventative framework. The key, I feel, is striking the right balance between transparency about the process (and outcomes) and protecting those impacted. It's hard to believe in a disciplinary function if we never see or hear about it.

1	Communicate expectations clearly.	<input checked="" type="checkbox"/>
2	Write down consequences for violations (a sliding scale depending on severity is fine).	<input checked="" type="checkbox"/>
3	Communicate the consequences. You don't have to bark at people; you might choose to...	<input checked="" type="checkbox"/>
4	...Anonymise case studies of past issues and explain the consequences. I appreciate you need to be a certain size to do this with a degree of confidentiality, but the more people know you take this seriously, the more comforted most people will be.	<input checked="" type="checkbox"/>
5	Be transparent with stakeholders (especially anyone impacted by the issue) about what is and isn't achievable. For instance, if the dispute involves only two people it won't stay anonymous.	<input checked="" type="checkbox"/>
6	Review your performance on every investigation and implement improvements.	<input checked="" type="checkbox"/>
7	Don't botch investigations by making rookie mistakes (e.g., chain of custody, illegal confiscation of devices, failing to have a union representative present).	<input checked="" type="checkbox"/>

19) Resilience Check

In the last section, we looked at issues within the organisation. Now, consider all those things that could threaten you outside the organisation. Okay, let's not. Well, not yet anyway.


When most organisations think of threats, they often couch them in competitive terms. That's great, but what about other potential adversaries? When I ask leaders about that, they usually discuss scary regulators. How many organisations are prosecuted yearly for big bad things like environmental spills, embezzlement, worker mistreatment, and supply chain violations? Not many.

I'm not suggesting "to hell with regulations." It's just not the best starting point for building organisational resilience. Getting embroiled in a major regulatory, political, or media scandal is like being attacked by a shark - devastating but unlikely. Sharks kill around 12-15 of us per annum. Sharks are those major scandals - grand corruption, dieselgate, planes falling out of the sky - but what about mosquitoes? Mosquitoes kill 2-3 million people each year. They're all over the place and carry a variety of diseases. Mosquitoes are the daily assaults on your sustainability plans and integrity that can majorly undermine your organisation at the aggregate level. They include fraud, harassment, misreported GHG emissions, community unrest, and environmental degradation.

When our people face these more frequent but less immediately scary threats, we must arm them. Specifically, with three things:

1. Knowledge
2. Tools for better decision-making
3. Forums for discussion

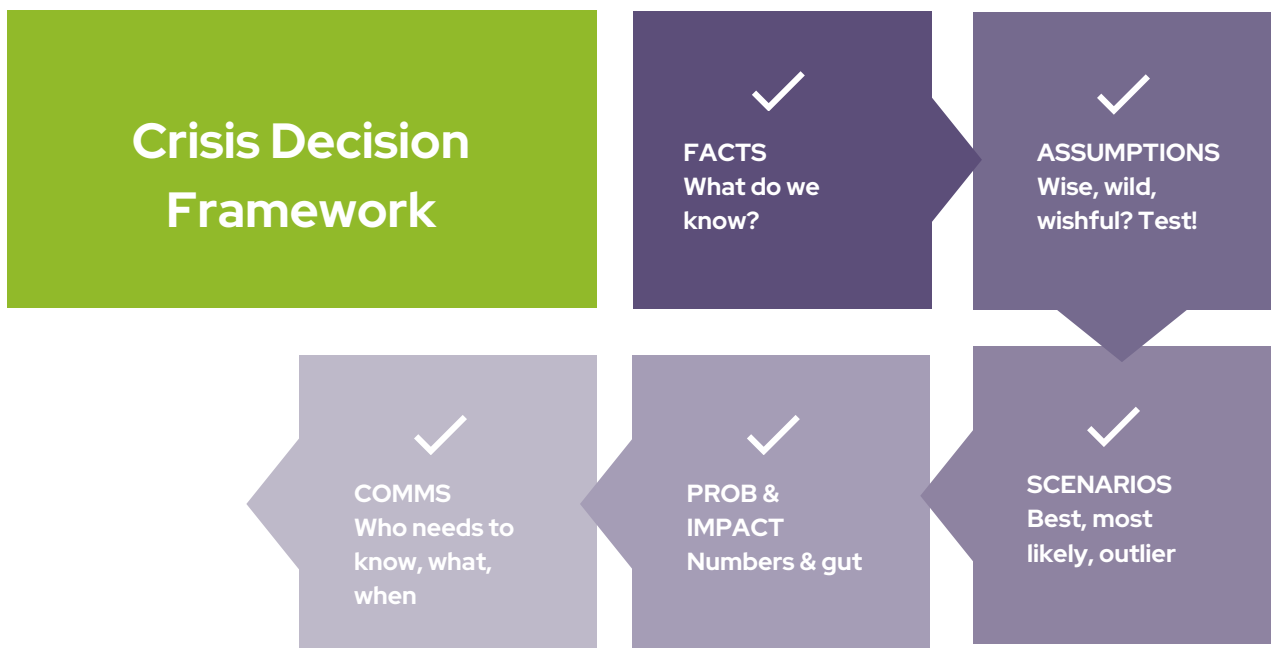
We've covered the first point above - rightsizing risk to those you face. We've also considered creating a culture where problems are discussed ([point 3](#)). But decision-making is a vast area. In the interests of brevity, I'd suggest considering these three concepts:

1. Pre-mortem: Consider doing the thing we think we probably shouldn't. How does that look? What went wrong? What could we have done differently?
2. Five whys - the application will depend on the issue, but the aim is to get to the root cause.
3. Crisis decision-making framework ( next page) - I've used this for 20+ years now, and its leading utility is preventing us from acting on assumptions (too much) and recognising that few issues are binary (scenario-thinking, also called thinking in bets).

19) Resilience Check (cont.)

In each of these frameworks, much of the value is making us step back, pause, and think. When we do this habitually, it also improves non-crisis (or risk) decisions—particularly, making us consider the second-order consequences of seemingly good things we want to do to make us more sustainable.

Remember, the motor vehicle was heralded as the saviour of London by alleviating the horse manure clogging up the streets and waterways. Then, the internal combustion engine became the villain, and the electric vehicle became the saviour. What next, when we contend with finite resources for batteries, petroleum products used in their manufacture, and end-of-life/recycling challenges? These decisions may still be net improvements, but considering the consequences of decisions is the most helpful skill in organisational resilience and sustainability.



20) Prevent, Detect, & Respond

Most organisations are biased toward action. In risk, we often consider effective management as balancing planning, detecting, and responding. Fail to plan, prepare to fail. No detection mechanisms create fertile ground for misdeeds. A lack of adequate response harms resilience, which has (understandably) become a byword for success in an increasingly complex and volatile world. But no one tells you how to spread finite resources across those domains.

It depends and ebbs and flows. For instance, at the start of many businesses or new ventures, you don't know what you don't know (like planning for a trip when you don't know precisely where, when, with whom, how, or what you'll be doing; see image below). Strategic planning around risk and sustainability is sensible and will likely inform your SWOT analysis. But, if we return to the barely conscious fridge analogy, we might find:

1. We plan to live healthily and buy all the right things to stock that fridge.
2. We go to the doctors and get regular health screenings.
3. Then, we get hit by a driverless car on the way to work.

We might then plan a different route to work or take greater care crossing the street. So it goes with risk and sustainability; our resources will range across those three areas.



20) Prevent, Detect, & Respond (cont.)

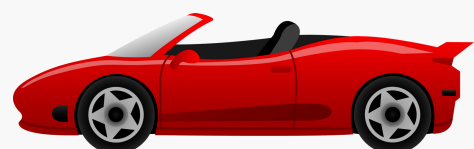
You might argue that's not very helpful. I agree. So, I have tried to think of a framework that might inform your approach to mapping resources across prevention, detection, and response. When I did this, I realised it needs to be different across functions within your organisation.

If you're an online retailer stocking hundreds of items, where the maximum price of one unit is \$50, but you have thousands of transactions daily, the cost of failure per product might be survivable. For instance, if a media report names a particular product as contributing to modern slavery in Chinese factories exploiting Uighur people, you should be able to respond decisively (investigate, delist the product, find alternate providers, etc.). But, your impact in the aggregate, if your packaging is mainly single-use plastic with lots of transport emissions, could be significant. The teams handling product issues will, therefore, need a very different prevent, detect, and respond framework to those managing logistics and packaging.

If, however, you're supplying complex equipment with a high per-unit value used in life-saving capacities (e.g., medical devices, water purification, etc.), where transactions are less frequent and individual failure could be catastrophic. Well, you can guess that you'd be wise to spend most of the resources on planning (to avoid issues, source responsibly, conduct clinical trials properly, etc.) and detecting (testing, checking the sustainability of supply inputs, etc.).

Whatever approach you take to sustainability and risk management, my final observation is not a fridge metaphor but a vehicular one.

Don't build a Ferrari if your business travels on potholed mountain roads. And don't rely on a tractor if your business moves fast, in tight spaces, with fine margins. Sustainability and risk must match your world. Once matched, it will work (or not) depending on the quality of your communication - knowledge, access, accountability, and trust.



Who We Work With...

"I have worked with Rupert to conduct assessments and advise on projects with our investment portfolio companies. He is particularly skilled at sensitively engaging with firm leadership on very tricky topics.

Rupert's assessments provide solid tools to help our investments become better businesses, providing guidance appropriate to a company's stage of growth."

Rita Roca, Business Integrity Leader, IFU

"Ethics Insight provides a toolkit to operationalise an organisation's ethics, risks and sustainability. They help build a culture where doing the right thing is the norm."

Kevin Withane, Founder of Diversity X, and UKBAA Angel Investment Award Winner 2023

"I wanted to align strategy and sustainability. Rupert showed me that there are many ways to make sustainability strategic.

Rupert has helped me become a better problem solver, strategic business person and clear communicator."

Danielle Crawford, Senior Advisor, Corporate Sustainability Performance, Rio Tinto



Swedfund



TI Fluid Systems



EVBOX



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ERICSSON



OCEANAGOLD



PRUDENTIAL



WSP



TOLL



JOLIBA CAPITAL

Rupert Evill



I help people make better decisions – reducing risks and leveraging sustainability.

I have 23 years of experience across 50+ countries – from integrity, political, and regulatory risks to sustainability – seeing what strategies and tactics work (and which don't). Much risk and sustainability methodology is dogma; I cut through the noise.

After studies focused on sustainability, I started working in roles focused on political risk, crisis response, and counter-terrorism. I spent 13 years with Control Risks – predominantly investigating, conducting due diligence and risk assessments, or gathering intelligence on sustainability, security, geopolitical, and integrity issues.

I founded Ethics Insight in 2019 to support the underserved mid-cap, SME, and impact investor communities. My approach couples the clarity required in the high-stakes situations I experienced early in my career with empathy for organisations trying to do the right thing long-term, often with limited resources and increasing expectations.

I have augmented my professional experience with postgraduate studies in Behavioural Analysis, ESG, and Business Sustainability Management. I am a Certified Fraud Examiner and Crisis Responder and sit on the Association of Corporate Investigations advisory panel. I wrote a book, "Bootstrapping Ethics", to help those with limited experience or resources navigate sustainability, risk, and ethical challenges.

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for reading!**

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