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INTEGRITY CULTURE AS A FORWARD-LOOKING SUCCESS FACTOR: A PRACTICAL EXAMPLE

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ABSTRACT

Integrity Management is generally understood as a reaction to forensically relevant corporate situations of any kind whatsoever. A critical case occurs (corruption, cartel, and fraudulent transactions) and the call is made for compliance (for external control) and integrity (for internal cleansing).
The following article sees it from a different perspective: Integrity Management as a proactive control factor of support in the implementation of strategic goals.
Starting with a quick glance at historical positions of the ethical discussion and in conjunction with some pragmatic considerations on the topic of integrity, it will demonstrate, using a case from practical experience, how an organization uses Integrity Management to shape the culture and thus the character of the enterprise in such a way that Integrity Management becomes a fundamental component in implementing the strategy.

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I. INTRODUCTION

November 2006: 200 police officers make their way toward central Munich. Their goal: the head office of a large German DAX company. Their suspicion: corruption, bribery, deception. Suspicion quickly turns into certainty – the first detentions take place in December and in March 2007, an active executive board of a DAX Group is arrested for the first time. The investigations drag on, more and more responsible parties land in a swamp made up of bribery payments, corruption, and dirty transactions – more than a billion euros have disappeared into dark channels. The press writes about mafia-style situations, the company's image is damaged.
But the new top management of the Group wants to clean things up: a Compliance Officer is appointed, with more than 600 employees reporting to him, who are to expose and prevent statutory violations within the company. All is expected to be well again.

July 2017: once again, the Group hits the headlines. Some of the Group's products have turned up in an area where no products are allowed to be delivered due to the current political situation and imposed sanctions. Group management talks about having been "deceived", while others assert that Group management knew very well where the products were destined to go, but relied on the silence of the buyer.

An everyday case, which shows: the temptation is always there – the rules are clear, but the behavior still violates them. The motive: in this case, money.
Compliance means that companies and organizations fulfill their legal obligations and comply with internal standards. It thus becomes a matter of ensuring that all employees comply with the legal and commercial traffic regulations. Employee training, referrals to rights and regulations, and possible sanctions stand on the side of the potential implementation of regulations.
Time and again, revealed instances of rule violations at large companies end up catapulting the topic of compliance to the top of the agenda. Then – depending on the size of the company – a whole host of judges are appointed as compliance managers with the task of ensuring law and order in the actions of the company employees.
The idea behind the compliance approach is to strengthen control and intensify the penalties for violations, where applicable, so that the rule violation results in significant losses, which surpass the supposed benefit of the rule violation, such that the risk of such a rule violation is no longer lucrative. Such a perspective is extrinsically motivated.

Another point of view is the Integrity Perspective, prominently formulated by Lynn Sharp Paine back in the mid-90's, which has meanwhile been academically received and discussed many times. The Integrity Perspective posits a counterpoint: it takes the position that managers and employees are independently concerned with compliance due to inner convictions – because they live the spirit of standards due to their inner conviction. Integrity is based on one's inner attitude (Greek: ethos).
While one can conceivably assume with respect to Compliance Orientation that for the overwhelming majority the respective compliance with rules and standards can be conveyed through sanctions, in the case of integrity it pertains to the issue of whether ethos

as an inner attitude for a reflection of morals can be conveyed or whether it is an aimless undertaking, which is doomed to fail from the start, because humans are not receptive to it – to summarize this position: integrity is an attitude that one either has or does not have. It is molded in the first two decades of one's life, during which the inner attitude and the inner value structure slowly take shape.

II. COMPLIANCE AND INTEGRITY: AN ANCIENT DEBATE

The question is whether this argument can be supported. If it were true, it would have direct implications on the issue of whether employees at all hierarchy levels of a company are able to learn integrity in general, or whether the attempt can only be achieved on the extrinsically oriented compliance side, i.e. via (also positive) sanctioning.
Interestingly enough, this goes right back into the middle of an age-old debate, which describes the hour of birth of ethics: for the verifiable written history of ethics begins with Socrates (469 to 399 BC) and his student Plato (427 to 347 BC) – the fragments of the so-called Pre-Socratics are hardly systematic contributions to ethics. At the time of Socrates, there was a doctrinal conflict between himself and Plato on one hand, and the opinion leaders of philosophy at that time, the sophists, on the other hand. The point of contention was: can one teach virtue and morals as one teaches math and spelling – this would be the compliance approach today – or must this capacity for good actions derive spontaneously (of one's own accord) and from one's own knowledge – which today is known by the key word "integrity".
The sophists, roving migrant philosophers, approached the issue pragmatically: practical issues of ethics were a decisive factor for them. The sophists believed that one could easily teach people virtue, specifically to the degree they benefit from it. For they were convinced that there was no universally valid, objective virtue doctrine, but rather that virtue is always a subjective matter for each individual. According to the sophists, virtue was not an objective commodity, which one can approach with the aid of self-awareness, asceticism, theoretical debate or the like, but rather a teachable ability such as the art of speaking or mathematics. The sophists believed that no values or virtues were valid by nature, i.e. objectively valid. The sophists' thinking was therefore also characterized by relativism and skepticism.
They were skeptical to the extent that they did not believe in an absolute truth. Values and virtues arise based on the positing by man. They believed that virtues had a different validity at different times and at different places, depending on the agreement reached among people and as it is beneficial to them.

Socrates and Plato were of a different opinion: they assumed that there was an objective form of knowledge, in particular of [that which is] good. Goodness, therefore, and the capacity to act according to goodness cannot be taught, but one must instead come to an understanding of what is truly – and objectively – good from his own incentive, through reflection and contemplation, and act accordingly.
Socrates assumed being able to arrive at a good life by way of self-awareness. Socrates was convinced that every person has within himself the capacity to recognize good; according to Socrates, one can identify the hidden virtues through skillful questioning, for oneself, and for others, provided they can get involved in a philosophical discourse.

Socrates wanted to learn about the motif of an action from his dialog partners, and what values, conceptions and rules characterize the action.
These values must also be scrutinized again, says Socrates, and he was not satisfied with simple, superficial answers. If one continues to question, then one finds out that which is the true good, and how one implements it in the world.
Socrates perfected this process of continual self-awareness in the dialogues that his student Plato wrote down: in response to every statement of his dialogue partner, Socrates attaches a new question, pushing the stake of knowledge deeper and deeper into the mind of the counterpart. At the end of the dialogue, both dialogue partners have at times come a good step further, but sometimes not, and the readers at first lag behind in a state of confusion. But Socrates' questions in the dialogues are guided by interests, since the object of the dialogues is that the dialogue partners – and that means the readers – ultimately arrive at the knowledge of themselves – from their own incentive. Socrates serves as the midwife in the ever-new re-birth of self-awareness. That is why one speaks of maieutic in Socratic philosophy.
Once one has understood what virtuous action is, one can – according to Socrates – act in accordance with it. In other words: true self-awareness, according to Socrates, is the prerequisite for virtuous actions.

The idea of what is good is also the fundamental issue and guideline of Plato's philosophy as well. Plato's approach goes further than Socrates' does, he thought in more abstract terms: the idea of what is good forms the basis not only for his ethics, but also for his entire philosophy. Plato begins by conceiving of ethics theoretically, for he poses the question as to how the idea of what is good is acquired and how one can describe its repercussions on people's everyday life. The concrete actions of man are primarily secondary for him.
Plato arrives at the doctrine of virtue by way of doctrine of the soul. Plato perceives three parts to the soul of humankind: the actual divine, reason, and the two parts that refer to the perception of the world: the higher part, courage, residing in the chest, and the lower [part], desire, residing in the belly. Plato allocates one virtue to each of these three parts of the soul: to reason the virtue of wisdom, to courage the virtue of bravery, and to desire the virtue of moderation.
Plato places justice above these three virtues as the fourth cardinal virtue. Justice connects the first three and is at the same time the foundation and roof of the other three virtues. According to Plato, when all of the three other virtues are in balance with each other, man lives justly. In other words, none of the virtues may be over-emphasized, only through balance does one achieve a righteous life.

The Greek philosopher Aristotle (384 to 322 BC) represents an intermediate position in this dispute to a certain extent. To Aristotle, ethics is an academic discipline along with the doctrine of thought (logic) and the doctrine of nature (physics). Primarily in his books "Nicomachean Ethics" and "Politics", Aristotle develops ethics – corresponding to the state of discussion at the time – as the doctrine of virtue. Ethics is therefore part of a practical philosophy because it deals with the application of knowledge to everyday life. In this way, Aristotle travels a path of ethics closer to life, in contrast to Plato who applied himself primarily to ethical theorizing.

According to Aristotle, ethics differs from logical philosophy in that it does not strive toward knowledge for its own sake, but refers to the spirit and purpose in actual practice. By nature, states Aristotle, everyone strives toward Good, because it is there where he finds bliss.
Aristoteles distinguishes two types of virtues: one being the dianoetic (Greek for relating to reason) virtues, and the other being the ethical (Greek for relating to habit) virtues. According to Aristotle, the dianoetic virtues are perceptible through reason, while the ethical virtues can already be found in tradition, in political order, in togetherness. Man must grapple with them and practice them by means of familiarization (thus the name ethical!). In other words: there are virtues that are derived from knowledge and there are virtues that result from practicing certain actions.
To determine the ethical virtues one must be clear, according to Aristotle, as to the context in which one understands actions. It therefore deals with delimiting the actual framework within which people act and desist from action. Aristotle finds this concrete space for his ethics in the polis (Greek for city-state), the Athenian city-state at that time.
Fundamentally, Aristotle goes the way of the aurea mediocritas (Latin for the happy medium) in his doctrine of virtue, i.e. the middle path between the extremes. Virtues such as competence, strength and capability, as well as aptitude for good actions never reach imbalance according to Aristotle, but rather seek balance in the middle.

What results from this – granted very rough — description of positions?

1. The first position assumes that morals can be taught, that they can be "brought home" to people, to express it in modern terms, in the form of a service. The sophists were not only convinced of this, but they also earned money by means of it. Depending on the external rule, the internal attitude, virtue, adapts and does what complies with the rule. Expressed in modern terms: the internal attitude complies with the law – in a certain form of the antique compliance approach.

2. The second position purports that virtue and morals must come from man himself; while surely it is possible to further this self-awareness process through questions and suggestions, but it is not really teachable, says Socrates. That would be the puristic integrity approach, which at the same time would assert that correct behavior, correct attitude can only be achieved through inner attitude and conviction; training and instructions on it would thus also lose their significance, because the motivation is intrinsic, through and through.

3. The third position, Aristotle, in turn starts with the existence of virtues, which can be perceived with the head and the heart: to pursue the middle course, which presumes making an active decision, reflecting on the conduct of life, i.e. ethics. This can be learned through experience and reason, for everything by nature strives for Good. This approach appears to be a useful portal for leaving the two one-sided positions and resort to a reality-oriented middle course.

This third position can be used to put the compliance-integrity topic in a broader context,

because integrity culture can only be lived in an organization if it resorts to this middle course, without falling into one of the two extremes (solely compliance or solely integrity orientation). Furthermore: the theoretical approach behind it opens up a new perspective on the debate. That is because this debate on the integrity of an enterprise is in fact only pursued most eagerly if a company and/or decision makers in businesses and politics are caught in misconduct.

III. INTEGRITY CULTURE AS A PROACTIVE STRATEGY

Another method of approach is presented below. With the aid of a subsequently described practical example, the process as to how the integrity approach can be implemented within an organization as a basis for a forward-looking strategy is explained. Neither an offense nor an infringement need be the impetus for Integrity Management, but the integrity approach can help implement the strategic goals of company management. Development of an integrity culture need not be defined as a response to a misdemeanor or a catastrophic event of any kind, but rather offers the possibility of a proactive change process, which can help provide an enterprise with more market security and strategic orientation.

The starting point for thoughts on developing a proactive integrity strategy is the St. Gallen Management Triangle: in an organization, strategy needs structure and culture to support it. In competing for customers and talent, companies and organizations want to win the hearts of people with their products or services. To this end, it is important to know where the heart of the company or organization beats. Values and attitudes, the culture of an organization, are supporting pillars alongside the structure and organization, enabling strategic corporate goals to be implemented. Strategic goals and performances are only effective if the employees direct their activities, day after day, toward implementing the strategic goals and driving forward the strategy. It's about the character of the organization. This is where proactive Integrity Management begins.

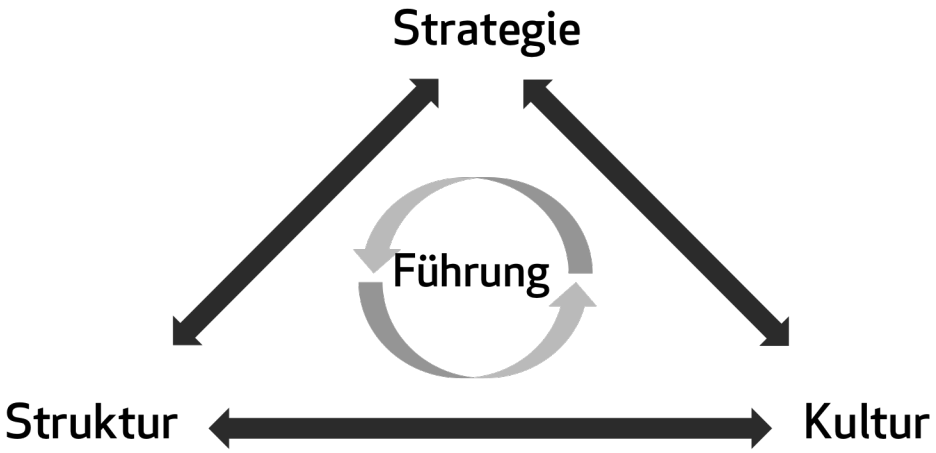

Fig. 1: „The St. Gallen Management Triangle"

To form culture and values within an organization, which are a component of solid Integrity Management, it is important to broaden one's view. For values go deeper into the character of an organization: when it comes to values – in the initial approach at least – it is necessary to distinguish between intangible assets (truth, trust, love, etc.) and tangible assets (money, house, etc.).
Ethically relevant values that a person brings with him/her depend on origin, education and character. They are a subjective commodity suitable to the times, the maintenance, care and outward explicitness of which always lie within the intrinsic motivation of the subject and in certain circumstances are not affected by external rules, measures or appeals. That is, in case of doubt it is possible that extraneous laws, appeals and rules within an organization may not even be perceived by individual employees in the organization, may not really get through to the attitude of this or that individual, because the inner attitude of the person does not hold the door open to receive them.

The goal of Integrity Management as a proactive strategy approach is that employees of all levels contribute to the overall value of the enterprise based on intrinsic motivation. It is therefore a question of linking economic values to intangible, ethical values; it is not a question of pitting them against each other.
Integrity Management defined as a proactive strategy factor strives to entrench intangible assets in the company, into the corporate strategy, and view them as an asset, as a positive value, with which the employees can identify. It pertains to the character of an organization, which distinguishes it from others - in times, in which VUKA characterizes the environment of organizations and the employees working there, a market advantage not to be underestimated!

IV. INTEGRITY MANAGEMENT AS A PROACTIVE STRATEGY FACTOR PAYS OFF IN THE MEDIUM TERM

Managerial and value-oriented, integrated behavior should mutually complement each other. They should be complementarily aligned and in this way contribute to the success of a company. Consultants and managers and their female counterparts often make a distinction between hard and soft success factors.
Hard success factors in this totally questionable explanation include measurable success figures such as market leadership, key strategy, strategy implementation and control, marketing, specialization, closeness to the customer, solid partnerships, high level of innovation, quality products and service, organizational structure, production technology, resource availability, etc.
By contrast, the so-called soft success factors are described as those, which at first glance cannot be measured in figures, such as employee identification and motivation, openness to innovations, listening to customers, corporate culture, time management, authentic leadership styles, management quality, mission statement, codes of conduct, etc.
According to this classic division, work on the integrity of an organization would be a so-called soft factor, since the topic has to do with mission statements, motivation and identification, and not with controlling, marketing or product management. At the same

time, the question arises as to whether the division into hard factors (because they are supposedly directly measurable) and soft factors (because they are supposedly not directly measureable) actually makes sense.

There are good reasons to abandon this classification, because the so-called hard factors depend on the soft factors and vice versa. Closeness to the Customer, quality assurance, and strategy pertain to how strongly employees identify with the company. Production processes on paper and optimally organized with the help of consultants will not cut it if the employees do not go along with them. The most stringent rules and controls, be they on the part of the state, or be they internal within the company, do not help at all if the employees do not wish to comply with them from within themselves – see also the example at the beginning, see also our individual behavior in road traffic for example: the rules here are happily transcended or stretched, because presumably one's subjective perception describes a different relationship than that which would objectively make more sense for all.

In other words, it is obvious that there are key figures and success factors, which are of an objective nature and can be quickly calculated based on formulas and specifications, which can then also be compared and show developments such as trends. Another obvious fact is that without culture, which helps carry these structures and strategies, it is simply impossible.

The service provider, a company with about 750 employees, had been through various changes at the management level in 2013, and even the chairperson of the board was newly appointed. The new leadership developed and completed a new future strategy in a relatively short period of time, as to how they wanted to position themselves as a market leader in the industry, although in a market that had become ever more competitive over the years. The strategy was initially developed internally, and then further developed during sparring with external consultants. The sparring with external consultants in particular led the company to a considerable re-sharpening of the strategic goals, since the external consultants consistently kept an eye on the internal implementation and could thus keep the strategy free of meaningless generalizations. At the end of this process, which lasted about a year, the strategy was complete with vision, mission statement, values of the organization and strategic departmental goals. Partial goals for the year 2014 were derived from these goals and put into effect.

It quickly became apparent to the leadership group, however, that the simple adoption and announcement of the strategy internally was not enough; for while the employees received the strategy delivered in a nice glossy format, and many reported that they had read it, no one knew exactly how much any individual employee had understood and internalized. It was assumed that in the beginning this was only true for a few employees, and not because the employees had not been intellectually capable of it, but rather because in the strategic goals of the company, the actual meaning and way to implement them in the everyday activities of each employee were not evident enough. The cultural anchoring was missing.

The strategy was firm, but what that meant for activities in the workplace of the employees in customer contact, in service, in internal administration, was not clear, because there was no intrinsic motivation to implement the strategic goals in the everyday activities of one's own accord.

After company management caught on to this realization, the culture of the enterprise was given a closer look. Central questions were:
To what extent does the internal culture support the new strategy and goals?
What type of attitude, what type of culture, what character do we need as an organization, so that the employees can actually go along with the strategy?
What do we need to do to get the internal culture to practice the strategic guidelines within the meaning of an integral attitude?

The fact that this is a profoundly corporate cultural issue was obvious to the management group, while it was also clear that culture and the intrinsic attitude of the employees of the organization cannot be decreed, but must develop from mutual cooperation. For this reason, company management turned the spotlight on a number of questions:
Where can the Integrity Management as an organization have access to resources?
In what direction should the Integrity Management be further developed in order to breathe life into the strategy?
Where does the organization need intrinsically motivated employees who also pay attention to compliance with the strategic guidelines, in order to advance the entire enterprise?

To that end, the company management, together with external consultants, established the process of „Strategy-oriented Culture Development (STOKE for short). With this strategy-oriented culture development, the organization struck a new path. The evolved culture of the organization should be consciously perceived and subsequently reflected how as an Integrity Management it supports the goals and strategy of the entire organization. It pertained to a conscious development of the intrinsic motivation for culture in terms of the strategy according to the St. Gallen Management Triangle: Integrity as a proactive strategy factor.

V. A PRACTICAL EXAMPLE: FRAMEWORK AND INITIAL SITUATION

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VI. THE ROUGH FRAMEWORK: APPROACH, GOALS AND CONDITIONS

How was that tackled? First of all, the present culture was taken into consideration and analyzed. The objective was to clarify, which cultural values and attitudes support the new strategy of the entire organization and which ones stand in the way. Building upon this, a target culture was to be defined, with which the entire organization goes along. The target culture had a strong characteristic in reference to the integrity attitude of the employees. On that basis, certain measures were to implement the new culture into the organization. The goal was to reinforce a goal-based and reality-based culture, organized from the strategy itself, and breathe new life into it.

The following points were essential in order to establish the long-term cultural development within the organization for the medium term:

- Comprehensive inclusion and participation of managers and employees.
- Set an example from above, begin above and work across levels: executive board and managers as essential culture bearers, role models and ambassadors.
- Resource-saving approach: use existing formats, platforms and processes in the organization. Play on existing stages, with new ones only where truly necessary. This strengthens the intrinsic motivation as well as the individual employees (familiarity!)
- Emotional tangibility: interactive, illustrative and moving forms of communication are established.

Starting with these criteria, five phases were defined in view of the strategy-oriented culture development:

- Phase 1: Take measurements with responsible parties. Which detailed steps serve the purpose and fit with the organization?
- Phase 2: Analysis of the ACTUAL culture. Employees and managers discuss the existing culture with one another and summarize them in concrete examples, stories and images.
- Phase 3: Develop the TARGET culture. The company management gathers the results and sets the framework for STROKE, guided by the questions: which culture carries the strategy? Which cultural resources are available? What do we need more of, what less?
- Phase 4: Implementation of the TARGET culture. Alongside the strategy and in the everyday work, the organization reflects the cultural weaknesses and strengths and develops concepts on how the culture can be strengthened and developed.
- Phase 5: Transfer to the regulating processes of the company. Evaluation of the process completed to date.

Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
Take measurements before the process	Analysis of the ACTUAL culture	Development of the TARGET culture	Implementation of the TARGET culture	Evaluation and transfer to the regulating processes, supplement with additional measures

Fig. 2: „Overview“

A. Phases 1 to 3 as inventories and new definition of the entrepreneurial character of the organization

The goals of *Phase 1* were to develop the process plan for STROKE in coordination with the leadership team of the organization and create acceptance of the process through communicative inclusion of the employees.
To this end, STROKE was presented at an employees' meeting. The external consultants explained how the relationship between strategy, structure, and culture is to be interpreted, and identified the initial goals of the process. The relationship between extrinsic and intrinsic motivation was made clear, in order to clarify for the employees that it does not only pertain to the role of management, but that the employees themselves are ultimately the deciding change agents and by means of their own methods of working and communication, contribute to the intrinsic motivation of the other employees as well. The strategic added value of a proactive integrity culture can be conveyed in this way.
After determining the individual actors and their respective responsibilities, the key actors within this context were defined (works council, supervisory boards, etc.) and respective options were developed for these actors to participate in the in the ongoing process. In addition, the maturity level of the organization for this upcoming process was analyzed. Following this, kick-off workshops were held with the various actors, during which initial process ideas were presented and discussed.

In *Phase 2* the analysis of the ACTUAL culture based on an existing survey was on the agenda. In 2013 the organization conducted a detailed employee survey through another external consulting institute. Building upon this employee survey, the actual status of the culture and the awareness level for Integrity Management was ascertained. In workshops for employees, which were offered on a voluntary basis, the Actual culture was analyzed. Storytelling was used to make this specific. Employees were to talk about typical everyday examples for the culture, first in small groups, then in plenum and subsequently explain why these stories, these examples, and these cases are expressions of the current culture.
During the process, some negative examples (but not only negative ones) came to light at

first, fully intentionally. This purging effect of the initial workshops is an important transitional phase for this type of process. That is because in order to detect what is working positively, and also detect what is not going so well, it is helpful to also take a look at the negative side and processes (but again, not exclusively!), which allegedly or actually are not going well.
Another stage of the workshops was to ask the employees to depict their current perception of the organization in the form of a painted picture. This phase produced a number of hand-painted pictures of the organization, which reflected the culture in all its facets. This unit, which extended beyond storytelling, served the twofold purpose of uncovering the resources and development options in view of the culture in the organization and identifying the focal topics.

In *Phase 3*, the goal was to develop the target culture. After the contours of the actual culture were clearly outlined, the point was to determine the orientation of culture development and make it plausible. Phase 3 gathered the resources of the present culture and tied to good present practices. In doing so, it was important to keep in mind that the target culture is based on the strategy and supports the formulated values/goals. Moreover, the target culture being defined is intended to link to examples and pictures from Phase 2 and likewise show in activities, pictures and examples what will be strengthened, deepened and further developed in the future. Included here were strategically relevant projects and departments of the organization, the topics of which render the culture development and outlines of a future culture and Integrity Management concrete and tangible.
First of all, in accordance with the hierarchy levels, management was questioned about the target culture in a workshop. This took place in an intensive discussion with examples and a history of the present, each referring to the strategic goals, in order to keep the nexus to the strategy current and present. These workshops were carried out across all levels of the organization. Invitations on a voluntary level reached approximately a third of the workforce. The results of each workshop were in charts and guiding principles, toward which the organization is expected to orient itself in the future with a view to strategy, brand, and culture.

B. Two-day closed-door meeting of the responsible parties and employees' as key points

A two-day closed-door meeting took place at the end of the workshop series, in which selected employees (a feedback group formed at the beginning of the process) as well as the management team participated. In the closed meeting, the point was to summarize the guiding principles from the workshops, check them regarding their relatedness to the strategy and connect them to positive future narratives.
This intensive work was one of the key points for redefining the integrity culture of the organization. The supposedly simple task of summarizing and correlating developed into a fundamental debate regarding the character and orientation of the organization.
Subsequent to the closed meeting, the guiding principles were copyedited and – starting from the strategic goals – put into sequence.
Two years from the beginning of the process with the initial announcement at the employees' meeting, another special event occurred in the summer of 2016. The goal of the

event was to present the guiding principles to all of the employees on one hand, and enable them right then and there to engage in an initial discussion of the guiding principles during a brief encounter. The particular feature of the event was that it was not management that presented the principles of the culture, but rather the employees who had followed the process for two years in a feedback group. That brought necessary authenticity boost regarding acceptance, because that made it clear: they are guiding principles from the employees of the organization for the employees of the organization.
After presenting the guiding principles, which were always highlighted with examples, all of the employees had the opportunity to discuss the guiding principles in an initial encounter in the form of a Woldcafé.

C. Phase 4: Implementation in the Everyday Work World

In *Phase 4*, finally implementation was to take effect: the objective was to once again give all employees an understanding of the guiding principles in a half-day workshop and to derive measures from them that signified concrete implementation of the guiding principles for the respective areas of responsibility. First of all, general conditions and objectives of the implementation phase were set out in a management circle with all managers of the organization. Following this, workshops of at least a half-day took place within the departments and teams in a cascade manner from top to bottom. The workshops were conceptually designed so that the employees first embrace the guiding principles in depth, and from there take a look at which guiding principles the group is well positioned for (Resource view). Then, with an eye toward implementation of the guiding principles in the respective unit, identify any deficits. From these deficits ("Where is room for improvements?") two or a maximum of three topics are extracted, which the group will ultimately work on. The focus and framework here should be for one's own arena ("mind your own business"), not the neighboring department or the neighboring team ("If they would only get on with it, then we could ..."). The assignment is to plan and name the actions that could be implemented in one's own team, in one's own department. To that end, target action plans were developed and responsible persons were designated for the actions in order to achieve sustained progress in the implementation.
Conducting the action workshops was recorded in the target agreements for managers, so that sustainability could be achieved by means of target control. Since there were approximately 70 workshops in total for the entire organization, the time period for execution was spread out over several months.

D. The status today and the upcoming steps

In the meantime, all units have conducted workshops and developed appropriate actions tailored to the units. The units are currently working out these actions, for which the time allotted is the end of 2017. This is also recorded in the target agreements for 2017, thus providing sustainability of implementation.
Various supporting workshops are being offered by the consultants, which bolster the responsible parties for actions during implementation, and for obtaining feedback on their own actions via collegial consulting.

VII. SUMMARY

In developing an Integrity Managements and supported by the external consultants, the organization links to the formulated strategy as well as to strengths and resources of the present culture. Awareness of examples of a developed culture already experienced results in an integral attitude for employees and therefore to an integrity orientation of the entire organization. In addition, the organization proceeds with a practical orientation: development and communication of the culture in workshops, in which constitutive examples from practice are adopted and reflected upon with an eye toward solutions, so as to clarify, strengthen and develop the culture.

This approach could catch on: Integrity Management not as a reaction to critical situations within an organization of any kind whatsoever, but rather as forward-looking strategic planning, which acknowledges Compliance Management as a necessary variable, but only a secondary controlling variable in corporate development.