



2016 MIDDLE EAST ETHICS AND COMPLIANCE SUMMIT

Key Takeaways, Lessons Learned, and Best Practices from Leading Multinational Companies

Presented By:

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INTRODUCTION

In September, Parsons Corporation and Ethisphere partnered to host the 2016 Middle East Ethics and Compliance Summit, an event that brought together more than 100 leaders from more than 80 different organizations to share lessons, ideas and best practices to further ethical business practices across the region. The following pages highlight some of the key takeaways and lessons shared with participants from throughout the course of the Summit.

The following topics are presented throughout this booklet:

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Chuck Harrington, Chairman and CEO of Parsons, gives the opening keynote to the 2016 Middle East Ethics and Compliance Summit. (Click the image above to view Chuck Harrington's keynote presentation.)

A WORD FROM PARSONS' CHAIRMAN AND CEO

Chuck Harrington, CEO and Chairman of Parsons provided the opening keynote presentation at the 2016 Middle East Ethics and Compliance Summit, focusing on the role that companies can play in helping to stamp out corruption in the region (and worldwide). The following is a transcript of Harrington's remarks to the audience in Abu Dhabi.

We are delighted to have partnered with Ethisphere on its inaugural Middle East Ethics & Compliance Summit. For the companies and business professionals that attended this conference, your presence shows that you are committed to ethical business practices, and are also committed to the Persian Gulf's business practices—helping it to take its place among world leaders in the effort to stamp out corruption.

For those of you who don't know Parsons Corporation, we are a global engineering construction, defense and security company. We have over 14,000 employees performing large and complex marquis

projects around the world, with a particular focus on North America and the Middle East. Parsons has been in the Gulf for more than 60 years and we know how important a summit like this is—both for the governments in the region and for the local and international companies doing business here.

We are very pleased that when we approached Ethisphere about the idea for the summit last year, they saw the importance for a conversation like this to take place in the Gulf and immediately bought this idea to a reality. Across the globe, we are seeing more commitment from governments to adopt anti-corruption

“ But we have to remain vigilant. We don't take these efforts for granted. Just as there have been so many positive developments in global anti-corruption efforts in recent years, there are clouds on the horizon.

laws similar to the U.S. FCPA and the U.K. Bribery Act. There's more commitment to aggressively enforce those laws, more commitment to cooperate across geographic boundaries to pursue corrupt corporations and individuals; more commitment on the part of companies to adopt and enforce robust anti-corruption policies; and more commitment from people like you to do business ethically. We are also expecting the issuance of ISO 37001 later this year, the first ISO standard to specifically address anti-corruption compliance programs.

Moreover, we are seeing that type of commitment in the Gulf as well. From countries like Saudi Arabia, which has established a national anti-corruption commission and which in 2013 ratified the United Nations convention against corruption, and from leaders like Sheikh Muhammad Bin Zayed, who announced in 2015 the establishment of the United Arab Emirates Taskforce to investigate government corruption.

Things are certainly looking up. We cannot afford to be complacent, however. I have to admit that at Parsons we sometimes pat ourselves on the back. We believe in our integrity program. We regularly review and revise our Code of Conduct, both online and live training on the code. We developed leading and lagging metrics to measure the success of our program by business unit and linked to executive compensation, and we report those metrics to our Board of Directors at every board meeting.

Our active Ethics Committee consists of ethics officers around the globe, and a third-party ethics helpline available to all employees; we publish pe-

riodic ethics challenges that engage our workforce in discussion about real-world integrity issues they might encounter, and we award core value coins to employees who have demonstrated their commitment to integrity. These are just some of the efforts that we make to get our integrity message across.

But we have to remain vigilant. We don't take these efforts for granted. Just as there have been so many positive developments in global anti-corruption efforts in recent years, there are clouds on the horizon. There has never been such pressure, at least that I can remember, on company's bottom lines as we have seen over the last few years, coupled with plummeting oil prices and failing economies.

In many cases, projects and purchases are being canceled, delayed or reduced in scope, putting a squeeze on all of our businesses, resulting in more competitors pursuing fewer, and smaller opportunities. And with that come temptation sometimes to cut corners, perhaps to convince ourselves that what we are proposing isn't unethical, it's just sharp, hard-driving business practice.

That's why events like Ethisphere's Middle East Ethics & Compliance Summit are so important. We all need to be constantly seeking new and better ways to get our message of integrity across to our employees, our partners, our suppliers, and yes—to our clients. That's why the work Ethisphere does in the field of corporate integrity is vital. Ethisphere serves as a conduit to bring some of the brightest minds in the business together to share ideas, advance the conversation and most importantly—serve as a constant reminder to each of us to do better.



Ty Francis, EVP and Group Publisher at Ethisphere, Sonny Ellis, General Counsel at Parsons, and Noura Benfarhat, Lead Executive Counsel - MENAT at GE Oil & Gas, talk about Anti-Corruption at the MEECS event.

GOOD JUDGMENT OFFSETS CULTURAL CHALLENGES AND COI ISSUES

Written by: Aarti Maharaj

An Ethisphere survey conducted at the Middle East Ethics Summit reveals that about 56 percent of companies require conflict of interest disclosures on an ad hoc basis—a move that could easily allow these issues to spiral out of control. On the other side of the spectrum, anti-corruption can be effectively managed if companies invest in the moral compass of the workplace.

The Middle East's political and economic situation has caused many companies to put a brakes on expanding into this region but the rewards of doing business the right way cannot be ignored. Increasingly, as companies move into this uncertain market, they are rolling out extensive ethics and compliance programs that addresses some of the most sensitive issues such as culture.

In the Middle East, family relationships matter and what would be conceived as a conflict of interest in one region are sometimes viewed as just good family ties—or are they? For Western companies operating in the Middle East the problem lies in designing compliance programs that are strong enough to root out looming conflict of interest issues while respecting cultural norms and practices.



At the end of the day if staff are just following the rules and they're not applying good judgment when situations come up and that's where the loopholes exist. Really it comes down to this: if the culture is rotten and if its not conducive to good conduct you can incur fines for bribery and corruption, money laundering or for dealing with customers unfairly.

According to a report by Ethisphere data services which was conducted at the inaugural Middle East Ethics and Compliance Summit in Abu Dhabi in September, about 63 percent of participants said that they review conflict of interest issues as part of a compliance and ethics risk assessment process while 56 percent admitted that they require conflict of interest disclosure on an ad hoc basis.

“Managing of conflict of interests is almost like a risk assessment,” said Dominique Abrokwa, Sector Compliance Officer, Oil & Gas, SNC-Lavalin Inc., in a session focused on deconstructing the complexities of conflict of interest issues in the Middle East. “First you need to see exactly what type of risks exist and you need to understand them in order to put mitigation measures in place or ask ‘do we need to accept the risk?’ I think the most important thing is to have discussions to avoid things falling through the crack.”

The panel, “Conflict of Interest: Managing Relationship Risk and Organizational Conduct,” led by Abrokwa featured insights from industry experts such as Adele Smout, General Counsel - Compliance, Emirates Global Aluminium (EGA); and Anders Wigand, Regional Compliance Counsel,

Middle East, Nokia Corporation.

At EGA, for example the company's Code of Conduct highlights that employees are expected to complete an annual conflict of interest declaration form and update the declaration as soon as an actual or potential conflict of interest occurs. “Conflict of interest is all about transparency and mitigation,” said Smout. “Throughout the year, we consistently tell employees to make a declaration because this is for your own protection and 99% of the time we work out mitigation steps to reduce the risk of their business decisions.”

In the eyes of leadership, a conflict of interest may be perceived differently than an employee with a compliance background in the Middle East. While some companies may implement strict legal guidelines for those in the executive ranks, a different set of rules may apply to the board of directors to help them exercise reasonable oversight. Roughly 46 % of the survey respondents said that for board members or governing authorities, structured training on conflict of interest are usually provided during the on-boarding process—according to the panelists this is a bad idea for those operating in the region where conflict of interest issues can easily spiral out of control.

“Human Resources is playing a huge role in the induction and onboarding of people and then line management are the ones really owning the issue,” said Wigand. “Circumstances may change and new organizations may expand into the market, so you need to look at that environment and see how things have changed and if a conflict of interest issue should be managed differently.”

Nokia, which addresses conflict of interests in its Code of Conduct manages declarations locally and are continuously educating and training all level of its staff on how to handle conflict of interests around the world. For Wigand, the format of training is also important. “Sometimes I convert a small conference room at the office into a mini studio, where I use a web camera to communicate and have employees look at an issue closer,” he added. “Being personal helps get the message across.”

Anti-Corruption: Driving Good Judgment

Some of the best global standards such as the UK Bribery Act or the FCPA are not always easy to follow. The challenge for companies operating in the Middle East is creating an effective anti-corruption program that empowers employees to identify and speak up about wrong doing. On the first panel session at the Summit, “Anti-Corruption in the Middle East and the Global Enforcement Landscape,” thought leaders from top performing firms in the region gathered to discuss the advantages of maintaining a strong ethical culture.

Moderated by Tim Haynes, Senior Managing Director, FTI Consulting the conversation included: Salmin Jadavji, Regional Head, Anti-bribery

and Corruption, Africa and Middle East, Standard Chartered Bank; Irina S. Lazieva, Senior Counsel, CEEMEA Area Compliance Leader, 3M; Iohann Le Frapper, Vice-Chairman of the ICC Commission on Corporate Responsibility & Anti-Corruption, International Chamber of Commerce (ICC); and Aoun Sharaf, Director - Head of Compliance, Gulf Capital. As companies expand into international markets, the experts agreed that the best course of action is to invest in the moral compass of the workplace.

“At the end of the day if staff are just following the rules and they’re not applying good judgment when situations come up and that’s where the loopholes exist,” said Jadavji. “Really it comes down to this: if the culture is rotten and if its not conducive to good conduct you can incur fines for bribery and corruption, money laundering or for dealing with customers unfairly— I think comes back to culture.”

Another issue the panel addressed is the notion of a “bossy culture”. Across Asia, it is generally known that employees do not challenge their supervisors and according to the panel this is due to a lack of empowerment to make the right decisions. “The bossy culture is: do I dare speak out, challenge my boss or the boss of my boss or do I what I’m told to do so there’s no fall out,” said Le Frapper. “If local management is in charge of driving the business but also managing the compliance people whether its a full time or part time position the pressure will be on these employees to ask how can I challenge the boss of the unit especially if the risk for me is very high with a clear signal—this is a tell-tale sign of a bossy culture.”



“Parsons has six core values with respect to integrity. As engineers we develop metrics to measure integrity in all our operations, and doing so help ensures we operate at a world class level every where that we do business.”

- Sonny Ellis, General Counsel, Parsons Corporation

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Audience members comprised of executives from multinational companies look on as panel presentations take place during the 2016 Middle East Ethics and Compliance Summit.

TAKING THE BUSINESS RISK OUT OF THE MIDDLE EAST THROUGH ETHICS

Written by: Emily Rochefort

Operating in the Middle East is seen as a profitable business opportunity. But for many companies setting up shop in this region means preparing to deal with an avalanche of risks associated with complex regulations, third-party verification, cultural sensitivities and much more.

It's common perception that doing business in the Middle East comes with relatively high risk but establishing clear-cut compliance and ethics policies is seen as one part of the solution. The truth is, employees operating in different parts of the globe need regular training and frequent communication with compliance.

"One thing we have to be vigilant about is ensuring that our employees understand their role

and mission as representatives of our company," said Bill Bodie, Executive Vice President, Parsons Middle East Africa (MEA) during Ethisphere's Executive Ethics Roundtable in Abu Dhabi, United Arab Emirates. "Our employees understand what they can and can't be asked to do and what they shouldn't be asked and we have a fairly good track record of upholding the highest ethical standards." This was one of the many thoughts expressed at the roundtable, which was held the



The key is to facilitate ongoing engagement and educational exchange with our sponsors/agents and ensure that senior leadership and management in the organization are well connected to and understand the issues that may exist with a sponsor.

following day after Ethisphere's Middle East Ethics Summit.

Co-hosted by Parsons, the conversation focused on critical topics like company integrity, the unflinching adherence to compliance practices and reputational pitfalls. Attendees also had the opportunity to share new pathways to greater business success through the use of narratives and case studies. Other companies that participated in the event included: 3M; Department of Petroleum Resources, Lagos, Nigeria; Eagle Hills; Flash Entertainment, Emirates National Oil Company Limited, ICC Commission on Corporate Responsibility & Anti-Corruption, International Chamber of Commerce (ICC); MUBADALA; Parsons; Saudi Basic Industries Corporation (SABIC); Tata Steel, UPS, and much more.

Managing Cultural Sensitivities—A Two-Fold Approach

While companies implement policies to address culturally sensitive issues the real challenge is ensuring that compliance guidelines are applicable in different countries—and this is where employees are sometimes left in the dark. "When you do business in the UAE you realize how important it is to understand the nuance of culture and relationships," said one roundtable participant. "You have to figure out how to be respectful and faithful to those relationships while not compromising a global standard ethics and business practice." One issue that compliance officers currently face

is navigating the muddy waters of gifts and entertainment policies. "It's hard to believe it but I receive a lot of questions about shisha, and increasingly I am asked—should it be expensed?" asked one Dubai-based compliance officer. While shisha (also known as "hookah" in the US) is one of the oldest traditions in the Middle East, it is often not included a company's T&E policies. The smoking tool is often used in social gatherings and is a symbol of peace and friendship and is part of every day life in Middle Eastern cultures. Increasingly, its significance is spreading around the world but not every company provides training on how to handle these situations.

Dealing with Third Parties: Leadership's role

Front line leaders have long been the first line of defense—but does this strategy work in the Middle East too? Business executives and compliance officers continue to struggle with third party risk management and underdeveloped regulatory frameworks which differs across countries in the Middle East.

For U.S.-based companies, there are laws and frameworks for sponsors or agents but in countries like Saudi Arabia it is required that western firms doing business to have a registered Saudi entity and it differs considerably from US practice. In Qatar, for example, there is a free trade agreement with the U.S., which promotes a closer trading relationship between both countries. But "sponsors" in Qatar are categorized differently than those in

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the U.A.E. Case in point: depending on where you are conducting business, managing third parties can become sticky.

“We have a thorough system in place where sponsors and agents are vetted,” said Bodie. “But the key is to facilitate ongoing engagement and educational exchange with our sponsors/agents and ensure that senior leadership and management in the organization are well connected to and understand the issues that may exist with a sponsor.”

Foreign Corrupt Practices Act (FCPA) enforcement activity has continued to focus on relationships with third parties, particularly the use of sponsors or agents to win business. According to the 2016 Ernst & Young Global Fraud Survey, a staggering 23% of Middle East executives agree that it is common practice to use bribery to win contracts. Approximately one in five respondents in the Middle East also explicitly stated that they are willing to act unethically and offer entertainment to win or retain business. While this is bad news for companies operating in the Middle East, it should also be noted that companies are also doing less due diligence on third parties than before, the report said.

“Due diligence is not an insurance policy,” a roundtable participant said. “It depends on the risk appetite of leadership; you may show them where the risks are but it’s up to them to engage in unethical business activity or not.”

In cases as such, Parsons Senior Vice President, General Counsel and Secretary Clyde “Sonny” Ellis said face-to-face meetings are very important. Rolling out extensive anticorruption and anti-bribery policies are just one side of the coin— in order to effectively implement them, Ellis has found that regular meetings can help leadership understand the true nature of risks.

Parsons history of working in the Middle East dates back to 1953 and the company’s integrity program includes an active Ethics Committee which consists of ethics officers around the globe.

“An employee on the business side may have a different view off risks unless there’s an obvious ethical dilemma, said Ellis. “Again you don’t want to inhibit business, you want to give them as much rope as you can provide to make the right decisions but at some point we have to step in and say its not clear cut and that’s too much risk—it’s a hard conversation to have.”

At Parsons, transparency in training is equally important. Ellis highlighted that after a session of educating management or a member of the C-Suite on anticorruption/anti-bribery policies in their locations around the world, compliance will draft minutes about the meeting. In turn, these are used as a data point when measuring the effectiveness of Parsons’ programs.

Making the Judgment Call on Third Parties
Another hotly debated topic in the Middle East is dealing with third parties who came on board without a formal agreement—a common practice that is keeping compliance and ethics officers up at night. One participant said that a verbal agreement between an employee and an agent/distributor, which might have occurred many years ago poses serious regulatory and financial risks. The worst part is sometimes, these third parties can get lost in the business. “We found ourselves stuck with very old relationships—dated back to as far as 20 years ago and there were no written agreements,” a CECO added. “It’s easy to find issues but you can’t do anything with them since there are no agreements and the business has to decide if it’s worth the cost of termination.”

Several people at the roundtable admitted that taking the risk to terminate age-old third parties—despite the lack of formal agreements is a good move to protect the business from future risks. “I recommend terminating third parties that violate the company’s practices and in turn use this as an opportunity to educate the business on vendor risk management,” said Wafa Derouiche Compliance Counsel Europe, Middle-East & Africa (EMEA), TE Connectivity.



FTI Consulting's Senior Managing Director Tim Haynes discusses Anti-Corruption in the Middle East with representatives from 3M, Gulf Capital, Standard Chartered Bank, and the ICC Commission on Corporate Responsibility & Anti-Corruption.

THE GC PERSPECTIVE: COMPLIANCE IS A JOURNEY, NOT A DESTINATION

Written by: Aarti Maharaj

Ensuring that the company plays by the rules and are in compliance with all regulations have always been a fundamental role of the General Counsel. But due to shifting demographics and a growing global employee base, the responsibility of the General Counsel has expanded beyond compliance—making these professionals a trusted business partner.

The role of General Counsel and compliance has evolved the same way the business has over the past few years. In today's complex regulatory environment, the General Counsel is seen as part of the leadership team and the business. In the past, however, the role of the General Counsel was limited in scope but increasingly, companies are turning more and more to these legal professionals to provide advice that extend beyond compliance, according to a recent panel of experts at Ethis-

sphere's inaugural Middle East Ethics Summit in Abu Dhabi.

The session, "The General Counsel Perspective" featured Noura Benfarhat, Lead Executive Legal Counsel, Middle East, North Africa & Turkey, GE Oil & Gas; Clyde "Sonny" Ellis, Senior Vice President, General Counsel & Secretary, Parsons Corporation; and moderated by Ethisphere's Executive Vice President and Group Publisher, Ty

“ [Compliance] needs to be part of the solution and we need to have our business people view us as problem solvers not as problem creator. You have to build trust within the business leadership that when you do step up and say ‘I think there is an issue here’ then there really is an issue.”

Francis—identified ways legal professionals can deconstruct the issues at hand to the business and leadership. Often, the General Counsel's office is seen as a roadblock or is known to respond with a conservative “yes” or “no” answer to an issue without much reasoning behind their decisions.

“We need to be part of the solution and we need to have our business people view us as problem solvers not as problem creators,” said Ellis. “You have to build trust within the business leadership that when you do step up and say ‘I think there is an issue here’ then there really is an issue.” Ongoing dialogue is equally important. Client-facing employees who are “on the ground” can encounter a host of ethical issues and it is up to the General Counsel to ensure that this side of the business are well-equipped to navigate ethical dilemmas. Given the growing demands of the General Counsel's role it may seem easier to handle an issue via email but this is not always the right channel of communication.

“You need to build relationships and trust so that employees who interact with clients regularly will sit with you, talk to you and say if this situation is right or wrong,” said Benfarhat. “You proactively go out and have the discussions and understand the business and the risks, but also you rely on the whole business and all the employees to come to

you and say ‘we believe maybe this is not right, we think there is a risk in here, did I do the right thing?’”

Measuring the Impact of the Message

It is common perception that what gets measured, gets done. This is a lesson companies have learned, relearned and will likely learn again. Watchdogs around the globe are increasingly calling on organizations to examine their metrics and culture. From Enron to Volkswagen, the Challenger to WorldCom and Wells Fargo, there are multiple examples of organizations with formal systems that say one thing and cultures that promote another. According to the panelists all industries can benefit from gathering data. Ellis said that data—including lagging indicators should be used to measure how the message resonates with different employee base. “We do surveys periodically, if you survey your employee base too much they get tired of it, they turn it off, but once every 18 months, maybe two years, there will be a survey with questions not only about the employees’ commitment to integrity but how they think the company is doing,” Ellis said.

At GE, Benfarhat found that combing through granular details drives change throughout the

business. She added that when videos are distributed to employees, the company's data analytics team measure the amount of clicks and open rate to track how the relevance of a compliance video. Moreover, if employees feel empowered to speak up without the fear of retaliation, that's another indicator of the effectiveness of a message. "The way we see how the concerns are raised is actually a measure to know how many people are empowered. When you have an increase in the number of anonymous cases then you feel that we need to find the focus why people are not speaking up and disclosing their names when they raise a concern. We also compare it versus last year so are we on the right path."

From the C-Suite: Creating a Unified culture
In another panel, Alan Robertson, Chief Executive Officer, Middle East & North Africa, Jones Lang LaSalle (JLL) highlighted that for 200 years, the company has managed to maintain a solid ethical culture. The global real estate firm's core values of high ethical standards, great teamwork, excellence in client service, sustainability and diversity—applies to all branches around the globe—no exceptions.

In Robertson's role, getting the message across to 300 people of 37 different nationalities can be somewhat of a challenge at times but through

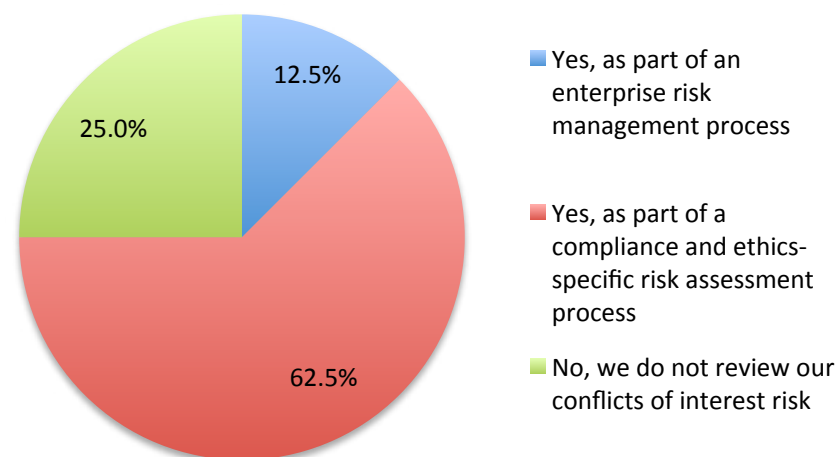
metrics, his team can identify how messages are received in certain regions. "The way that you get your message across to Indians might be different than how you get your message to our Lebanese colleagues or the Saudis," Robertson said during the session, "The C-Suite Conversation: Embedding Ethics in the Company Culture." He added, "we need to be more innovative and creative in the messaging than our colleagues in the UK would because in the Middle East we have a more multi-cultural group of people."

Operating in the Middle East does present its fair share of risks. Whether its language, regulations or the culture of gifts and entertainment, the role of the General Counsel has expanded to data collection which are needed to help the business understand and steer clear of nefarious activities. According to Robertson, the key differences between the Middle East and most parts of the United States is the sheer scale of the projects in the region in the real estate and construction industries. "The age that a young professionals get thrown into the deep end to handle a massive project, which back in the UK might come once in a generation and when it does happen it's someone with 30 years of experience doing it, not someone with 10 years of experience. It's another additional area of risk and this is why understanding of a region's culture and employee base are important."

SURVEY: CONFLICTS OF INTEREST ASSESSMENT WITHIN MIDEAST BUSINESS OPERATIONS

Alongside the 2016 Middle East Ethics and Compliance Summit, Ethisphere administered a survey to compliance and ethics leaders working in the Middle East around how they deal with COI issues. The chart to the right demonstrates how companies assess COI risk in the region. More findings from the survey can be found at:

<http://insights.ethisphere.com>



THANK YOU

Parsons and Ethisphere would like to thank the following organizations for participating in the 2016 Middle East Ethics and Compliance Summit, and for sharing their insights with peer organizations to reinforce the value of integrity in doing business across the region.

- 3M
- ABB Group
- Abu Dhabi Global Market Authority
- Abu Dhabi Sewerage Services Company
- Ahmed Seddiqi & Sons LLC
- Al Ansari Exchange
- Al Dahra Holding LLC
- Al Hosn Gas
- Alstom
- Apple, Inc.
- Averda
- BDP International, Inc.
- Boeing International Corporation Dubai
- BP
- CBRE Group, Inc.
- Cleveland Clinic Abu Dhabi
- Cummins Inc.
- Damco Logistics LLC
- Department of Petroleum Resources
- Dubai Mercantile Exchange
- Eagle Hills
- Eli Lilly and Company
- Emirates Global Aluminium
- Emirates National Oil Company
- Etihad Airways
- Etihad Aviation Group
- Eurasian Resources Group
- Expeditors
- Flash Entertainment
- FTI Consulting, Inc.
- GE General Electric
- Guardian Industries Corp.
- Gulf Capital Pvt.JSC
- Gulftainer Company Limited
- Hadeed Emirates Contracting LLC
- Hewlett Packard Enterprise
- HSBC Finance Corporation
- International Chamber of Commerce (ICC)
- International Projects Development Co
- Jones Lang LaSalle Incorporated
- Kerzner International
- MAFCO
- Maridom Palace Hotel
- MasterCard
- Mazrui International LLC
- McDermott International, Inc.
- MSB Consultancy
- MSD
- Mubadala Development Company
- Nardello & Co. (UAE) LLC
- National Petroleum Construction Company
- New York University
- Nokia Corporation
- Norton Rose Fullbright (Middle East) LLP
- Nshama
- OSN
- Parsons Corporation
- PepsiCo International LTD
- Rafhan Maize Products Co. Ltd / Ingredion Pakistan
- RAK Ceramics
- Reckitt Benckiser Inc.
- Rehmaniyah Management Consultants
- SABIC - Saudi Basic Industries Corporation
- Saudi Aramco
- Sidra Medical and Research Center
- SNC-Lavalin
- Sony Middle East and Africa FZE
- SPCB, P.C.
- Standard Chartered Bank (SCB)
- Tata Steel India
- TE Connectivity
- The Boeing Company
- Thomson Reuters Regulatory Intelligence
- Trimble Navigation Ltd.
- U.S.-U.A.E. Business Council
- UAE Federal Ministry
- University of London
- University of Sharjah
- UPS
- Visa Inc.

ABOUT PARSONS

Parsons is a technology-driven engineering services firm with more than 70 years of experience in the engineering, construction, technical, and professional services industries. The corporation is a leader in many diversified markets with a focus on infrastructure, defense, and construction. Parsons delivers design/design-build, program/construction management, systems design/engineering, cyber/converged security, and other professional services packaged in innovative alternative delivery methods to federal, regional, and local government agencies, as well as to private industrial customers worldwide. For more about Parsons, please visit www.parsons.com, and follow us on Facebook, Twitter, LinkedIn, and YouTube.

ABOUT ETHISPHERE

The Ethisphere® Institute is the global leader in defining and advancing the standards of ethical business practices that fuel corporate character, marketplace trust and business success. Ethisphere has deep expertise in measuring and defining core ethics standards using data-driven insights that help companies enhance corporate character. Ethisphere honors superior achievement through its World's Most Ethical Companies® recognition program, provides a community of industry experts with the Business Ethics Leadership Alliance (BELA) and showcases trends and best practices in ethics with the publication of Ethisphere Magazine and The World's Most Ethical Companies Executive Briefing. Ethisphere is also the leading provider of independent verification of corporate ethics and compliance programs. More information about Ethisphere can be found at: <http://ethisphere.com>.