Anti-corruption in Action
How is Anti-corruption Practiced in Multinational Companies?

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Anestis Keremis

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CBS PhD School

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CBS COPENHAGEN BUSINESS SCHOOL
HANDELSHØJSKOLEN

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The CBS PhD School is an active and international research environment at Copenhagen Business School for PhD students working on theoretical and empirical research projects, including inter-disciplinary ones, related to economics and the organisation and management of private business-es, as well as public and voluntary institutions, at business, industry and country level.

Foreword

Seven years ago I set foot in Denmark having one and only one thing in my mind; a PhD. I was thinking back then that if I am to leave Greece and live in another country why not make it count and chase what I have been dreaming for many years. The desired for me was to learn how knowledge is produced. How all these books get filled with words and meaning? Where do scholars learn and how do they decide what is to be put on paper? I have to admit that this focus on knowledge production steepened upwards my learning process and added an extra layer of uncertainty on several stages of this journey. No question was simple and answers usually led to more complex questions. As a person striving to answer as many questions as possible, this 'hobby' of mine led to moments of desperation and disappointment. If I regret any of my choices during these four years? Not really. Life is more a journey than a destination. We make mistakes and fail until we get something done. I was however certain for two things; first, that I will somehow finish the PhD, and second that in my PhD defense there will be a new member in the family.

It is fair to say that I am grateful for all the support I received in Denmark. Not only for welcoming me, my dreams and ambitions, but also for the kindness and compassion I found in people here. First and foremost, I would like to thank my supervisors Hans Krause Hansen, Jeremy Moon, and Antje Vetterlein. I feel forever indebted to my supervision team and I look up to your professional and personal ethos as well as mentorship. Your door was always open and your feedback and advice always sharp enough to ease my struggle and inspire me to push forward. It has been an absolute pleasure and honor to work with you all. Hans took over supervision when I was lost in my data and books and prior to my main fieldtrip to China. Although we had limited time available he was able to support me not only in making the decisions I needed to, but also to follow them consistently. Han's well-organized supervision and feedback allowed my interdisciplinary approach to settle first in me, and then as a scholarly contribution. I am really thankful for that. Jeremy, has been with me since the beginning of the PhD and regardless my ups and downs, certainties and uncertainties, he has always been there steadfast and ready to support me. No matter the question or challenge I was facing, Jeremy has been there to help until the finish. I truly have no words to express my gratitude. I started my PhD scholarship with Antje Vetterlein and I am grateful to her too for her guidance and support as well as the opportunity to start this endeavor in the first place.

ABSTRACT

In this thesis I analyze anti-corruption in multinational companies by examining how it is practiced by compliance officers. In light of a growing number of studies conceptualizing anti-corruption as a macro-structural norm or a micro-exchange between individuals, and scholarly calls for more attention to anti-corruption in the private sector, I theorize anti-corruption as situated and recursive activity. As a situated practice, anti-corruption happens within the socio-material context of multinational companies in global governance and globalization. As a recursive activity, anti-corruption is analyzed as the discursive and non-discursive action of compliance officers. In this sense, the broad question I ask in this study is *how is anti-corruption practiced by compliance officers in multinational companies*? To answer this question, I employ a praxiography-inspired methodology which allows for the reconstruction of the practice of anti-corruption. Fieldwork took place in Denmark and China to address both the design and implementation of anti-corruption corporate programs, and consisted of semi-structured interviews with anti-corruption and compliance experts, participant observation in relevant events, and document analysis of public and private documents and other written material.

The analysis of the collected data resulted in three papers; in the first paper, 'Translating corporate anti-corruption: How ethics are integrated in business', I examine how compliance officers translate anti-corruption into business practices. I build on Actor-network theory and in particular its concept of translations and show that the sociopolitical role of the corporation can be found also in the relationship between the company and its members. In the second paper, 'Anti-corruption and its inherent tension: When rationalities of self-responsibility meet business identities', I investigate how compliance officers think about anti-corruption. I draw on Foucauldian studies and argue that there are tensions between business ethics and risk management principles in anti-corruption discourse and practice. In the third paper, 'Anti-corruption in practice', I draw inspiration by the International Practice theory and I take departure in four regular but not exclusive to anti-corruption practices. I point out the benefits of using a practice theoretical framework in the study of anti-corruption, while I also show how both the intended and unintended consequences of the practice of anti-corruption are necessary for its constitution as practice.

I argue that anti-corruption is constantly negotiated between organizational members, and it is governed through technologies and rationalities of self-responsibility from compliance officers who consider themselves as business advisors. I therefore position this thesis within the field of anti-corruption studies with strong ties to the broader business ethics literature. More precisely, I make the following theoretical and empirical contributions; theoretically I offer an understanding of anti-corruption beyond the agency/structure dichotomy by highlighting agency as situated action shaping and shaped by compliance officers. In so doing, I bridge the conceptual gap between normative corruption control approaches and the dominant anti-corruption discourse. Second, I argue that the sociopolitical role of corporations is not to be found only in inter-organizational relations but also in the relationship between the organization and its members. And third, I critically analyze and show how anti-corruption has been normalized and rationalized in and around corporations. Empirically, I emphasize the emergence and proliferation of compliance as a default corporate function; the role of anti-corruption in enabling communication in corporations, and the importance of human capital in anti-corruption.

DANSK RESUME

Hvordan praktiseres antikorruption af medarbejdere i multinationale virksomheder? Dette er det spørgsmål, jeg besvarer i denne afhandling. Anti-korruption er blevet en standardfunktion i virksomhedsdrift gennem oprettelse af compliance-afdelinger og korruptionskontrolmekanismer i virksomheder. Men vi ved meget lidt om antikorruption som fænomen. På den ene side konceptualiserer strukturelle tilgange antikorruption som norm, der skaber individers adfærd. På den anden side overdrives anti-korruption i aktørbaserede tilgange ved at konceptualisere den som en cost-benefit beregning for individet. Begge fremgangsmåder ignorerer rollen for de ansvarlige medarbejdere og mere præcist den handling, der tages når virksomheder udøver anti-korruption. Derfor teoriserer jeg anti-korruption som praksis. Praksis er ofte blevet knyttet til menneskers gentagne handling i en social kontekst. Jeg anvender en praxiografi-inspireret metode, der muliggør rekonstruktion af udøvelsen af anti-korruption. Feltarbejde fandt sted i Danmark og Kina for at dække både design og implementering af anti-korruptions virksomhedspolitikker, og bestod af semi-strukturerende interviews med anti-korruption- og complianceeksperter, observationsstudier ved relevante arrangementer, og dokumentanalyse af offentlige og private dokumenter og andet skriftligt materiale.

Analysen på baggrund af det indsamlede data resulterede i tre videnskabelige artikler. I den første, "Translating corporate anti-corruption: How ethics are integrated in business", undersøger jeg hvordan compliancemedarbejdere oversætter anti-korruption til virksomhedspraksis. Jeg bygger på aktør-netværks teori og særlig dets koncept for oversættelser og viser at virksomhedens socio-politiske rolle også findes i forholdet mellem virksomheden og dens medarbejdere. I den anden artikel, "Anti-corruption and its inherent tension: when rationalities of self-responsibility meet business identities", udforsker jeg, hvad compliance medarbejdere tænker om anti-korruption. Her trækker jeg på Foucault og viser, at der er spændinger mellem virksomhedsetik og risikostyringsprincipper i anti-korruptions diskurs og praksis. I den tredje artikel, "Anti-corruption in practice", fokuserer jeg på fire gængse, men ikke eksklusive for, anti-korruption praksisser, på baggrund af inspiration fra "the International Practice Theory". Jeg påpeger fordelene ved at bruge et praksisteoretisk perspektiv når man forsker i anti-korruption, mens jeg også viser, hvordan både de tiltænkte og de uforudsete konsekvenser af at praktisere anti-korruption er nødvendige for, at det

konstitueres i praksis. Jeg argumenterer for, at anti-korruption er i konstant forhandling mellem de organisatoriske medlemmer, og styres ved hjælp af teknologier og rationalet for selv-ansvar for compliancemedarbejdere, som betragter dem selv som virksomhedsrådgivere. Derfor er denne afhandling situeret i anti-korruptionsstudier med stærke bånd til den bredere litteratur om virksomhedsetik.

Mere specifikt, kommer jeg i denne afhandling med de følgende teoretiske og empiriske bidrag: teoretisk tilbyder jeg en forståelse af anti-korruption der bryder med aktør/struktur dikotomien ved at understrege aktør som situeret handling, der former og er formet af compliancemedarbejdere. Derved bygger jeg bro over den begrebsmæssige kløft mellem normativ korruptionskontrol tilgange og den dominerende diskurs indenfor anti-korruption. For det andet, argumenterer jeg for, at virksomhedens socio-politiske rolle ikke kun findes mellem andre organisationer, men også i forholdet mellem organisationen og dens medlemmer. For det tredje, viser jeg, og kritisk analyserer, hvordan anti-korruption er blevet normaliseret og rationaliseres i og omkring virksomheder. Empirisk understreger jeg fremkomst og spredning af compliance som en standard funktion i virksomheder; anti-korruptions rolle i at etablere kommunikation i virksomheder, og vigtigheden af menneskelig kapital i anti-korruption.

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'Anti-corruption is usually referred to as compliance and it usually stands on two pillars. One pillar is ethics and the other pillar is regulations. So the ethics is all about what the company believes in. It is the values that you have in a particular company that would like to promote and you want all employees to share these values. But you can say a lot of this is actually common sense. The reality is, though, that common sense is not that common, so that's why a lot of things need to be documented. And then you have the other pillar which is regulations but that's pretty much the laws the company is under. Could be global laws, could be regional laws, could be local laws and could be requirements which are not legal requirements but those the companies decided to follow. Anti-corruption is just a set of measurements and a set of controls to actually make sure the company is staying legally and ethically compliant.' (Interviewee A8, 21-02-2017)

1. Introduction

This thesis is about how anti-corruption is practiced in multinational companies. As anti-corruption has been considered a global norm (McCoy & Heckel, 2001; Rose, 2015), crusade (Brown & Cloke, 2004) movement (della Porta, 2017), industry (Sampson, 2010), and regime (Getz, 2006), the legal (Nichols, 2012), financial and ethical (Ethisphere, 2017) risks associated with corruption in the private sector have contributed the most to the establishment and proliferation of the practice of anti-corruption in multinational companies (MNC). This practice gets realized with the establishment of corporate compliance and business ethics departments with the objective of ensuring 'integrity and ethical conduct throughout the organization' (Gottschalk, 2014, p. 64).

Anti-corruption in the private sector can be traced back to 1977 and the introduction of the US Foreign Corrupt Practices Act (FCPA), as a response of the US authorities to hard evidence that US companies regularly had payed illegal payments to foreign officials in order to obtain contracts (Darrough, 2010). The FCPA criminalized bribery in international transactions, but it took almost two decades before anti-corruption emerged as an international and global matter of concern. This development took place only after the control of corruption was prioritized in World Bank's and the International Monetary Fund's (IMF) agendas due to the harm corruption causes to economic and social development (Rose-Ackerman, 1997). The OECD and UN Conventions that followed in the late

1990s and early 2000s pushed countries to update their anti-corruption legislation (Baughn, Bodie, Buchanan, & Bixby, 2010; Rose, 2015a), while the introduction of the tenth principle of the UN Global Compact required signatory companies to report on their progress on anti-corruption (United Nations Global Compact, 2011). This regulatory and normative framework was further enhanced and globally diffused by the works of non-governmental organizations such as Transparency International as well as the initiatives taken by business and other private and multi-stakeholder initiatives (Fenton Villar & Papyrakis, 2017; International Chamber of Commerce, 2017; Sousa et al., 2009).

Multinational companies have economic and sociopolitical interests in the above developments. First, there is a business case for complying with bribery laws let alone the threat of fines from multiple jurisdictions with extra-territorial authority, which a corruption case may trigger (Nichols, 2012). Second, other scholars maintain that reputation matters (Sampath, Gardberg, & Rahman, 2018). Companies have more than enough motivation to be compliant and aligned with the norms and expectations of social responsibility when doing business since reputation and the ability to deliver social goods have been at the center of attention of interest groups and investors as well (Gond & Piani, 2012). Third, many scholars point out that corruption is harmful for business (Almond & Syfert, 1997). Indeed, corruption can be seen as problematic for corporations as for countries and societies not only because bribes and fines increase the overall costs of doing business (Pantzalis, Chul Park, & Sutton, 2008), but also because corruption creates market entry barriers for companies (Campos, Estrin, & Proto, 2010), hurts their innovation and productivity capabilities (De Rosa et al., 2010; Paunov, 2016), forces them to leave markets due to high costs (Hallward-Driemeier, 2009), decreases profits per firm (Ades & Di Tella, 2003), reduces the quality of products (Nwabuzor, 2005), and negatively impacts long-term performance (Baucus & Baucus, 1997).

Corruption is broadly defined as the abuse of entrusted power for private gain (Transparency International, 2017). Under this umbrella definition, it covers or extensively overlaps with phenomena such as bribery, fraud, or money laundering. For the purpose of this study, I focus on bribery and in particular its commercial and transnational form which restricts the object of investigation to transnational business to public or business to business relationships (Lord, 2013). According to the UK Bribery Act (2010), bribery refers to the offering, promising, giving, requesting, or accepting of a financial or other advantage with the intention to induce or reward improper

performance. In this case, bribery differs from fraud and money laundering in that it includes also non-financial inducements that may be used for the benefit of a commercial organization or individual. It is often related more to the intention to obtain an undue advantage than the value of the actual bribe. Bribery can appear in several forms such as in direct channeling of inducements through intermediaries, secretly negotiated payment between parties as in 'kickbacks', or requested in advance as 'grease money' or facilitation payment to expedite a routine procedure (International Chamber of Commerce, 2017).

Anti-corruption in corporations is practiced by compliance officers. This is not to say that only corporate employees with the title of compliance officer practice anti-corruption. Rather, anti-corruption is more a dynamic than a static function (Miller, 2014). Depending on the company's size, sector, operation, and maturity in terms of anti-corruption, the role of the compliance officer may be played also by CSR, communication, and sustainability managers, consultants, the executive management, and various internal and external and anti-corruption experts. Likewise, in some companies there are established compliance departments also known as 'Business ethics and compliance', whereas in other companies, compliance is a part-time responsibility of the legal, sustainability, internal audit, human resources, CSR, or communications departments. Nevertheless, the responsibility of the compliance officer and department is to ensure that the organization stays compliant with the internal and external ethical and legal regulatory framework the company operates within (Freeman, MCP, & MCT, 2007; Sampson, 2016). In order to do so, compliance officers utilize a set of corruption control mechanisms and logics prescribed by the global regulatory framework. Wrapped up under compliance, business ethics, and risk management logics, these programs include bribery risk assessments, due-diligence, training of employees, a Code of Conduct, whistleblower hotline, proper book-keeping, regular review and revision also known as 'best practices'.

In this thesis I utilize the broad theoretical concept of practice (Adler & Pouliot, 2011b; Callon et al., 1986; Dean, 2009; Feldman & Orlikowski, 2011; Nicolini, 2012; Schatzki, 1996) to analyze and understand anti-corruption. Practices have often been associated with situated action. By action I mean both discursive and non-discursive activity without giving priority to either.[1] Situated activity

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[1] I elaborate and discuss the ontological matter of discursive and non-discursive practices in methodological sub-section 6.5

refers to those discursive, historical, and material conditions within which action takes place (Nicolini & Monteiro, 2016). To understand therefore anti-corruption in action means to study the action of those who practice anti-corruption in MNCs. In order to do so, I employ a qualitative methodology (Schwartz-Shea & Yanow, 2012) inspired by praxiography (Bueger, 2014) to generate data from expert interviews with anti-corruption and compliance professionals, corporate private and public documents, and participant observation in selected anti-corruption and compliance events in Copenhagen/Denmark and Beijing/China. The outcome is a reconstructed practice where anti-corruption is constantly negotiated between organizational members and governed through technologies and rationalities of self-responsibility from compliance officers who consider themselves as business advisors.

The remainder of this thesis consists of nine sections. In the second section, the history of anti-corruption as a global movement is briefly reviewed. In the third section, anti-corruption is discussed in relation to Denmark and China as the main locales where fieldwork took place. In section four, the extant literature on anti-corruption and corruption is outlined and discussed leading thus to section five where the research question and sub-questions are presented. Section six follows with the development of the theoretical framework which builds on practice approaches and theory. The section concludes with a discussion on the study's 'flattened' ontology and its implications for the study of anti-corruption. Section seven is about the interpretive and praxiography-inspired methodology applied, followed by a discussion of the methods used, namely interviews, participant observation, and documents. The section closes with a discussion on the data analysis performed and knowledge production. In section eight summaries and brief discussion of the three papers is offered. The thesis concludes with the ninth section in which the main findings and theoretical and empirical contributions are summarized and discussed along with the study's practitioner implications, limitations and suggestions for future research.

2. A brief history of anti-corruption

Anti-corruption can be traced back to the late 1970s and early 1980s and one can distinguish three major stages or phases in its development (Jakobi, 2013b; McCoy & Heckel, 2001). The first stage concerns mostly the efforts of the US authorities to limit the phenomenon of bribery of foreign officials. In the second phase from the mid-1990s to the mid-2000s, anti-corruption was

internationalized and institutionalized through a series of international conventions and initiatives. From the mid-2000s onwards, anti-corruption entered its third and current phase as it has been internalized in the bureaucratic mechanisms of public and private organizations.

In 1977, the US FCPA was enacted as a response of the US authorities to the Watergate scandal as well as to hard evidence and indications of US companies making illegal payments to foreign officials for obtaining contracts (Darrough, 2010). The FCPA consists of two provisions, namely anti-bribery and accounting. The anti-bribery provision prohibits 'companies and individuals from corruptly providing, offering, or promising anything of value to foreign government officials to obtain or retain a business advantage' (Mark, 2012, p. 427). Its accounting provision requires companies to make and maintain accurate books and records of their transactions, and it also requires the establishment of a system of internal controls to ensure that the previous two provisions are followed accurately (Mark, 2012). As the first of its kind law with extra-territorial and extra-national jurisdiction, the FCPA enabled the prosecution of both national and foreign persons for their actions in the US and overseas. Although the FCPA was not regularly enforced during the first twenty years of its existence and its effectiveness in battling corruption has been criticized (Weismann et al., 2014), it is arguably the departure point for the anti-corruption movement that followed in the 1990s (Darrough, 2010). As we shall see in the following lines, it rendered compliance and business ethics programs as essential for organizations, and provided the blueprint and driver for the OECD Convention and treaty which contributed to the international diffusion of anti-corruption internationally and beyond the OECD area (Gabel et al., 2009).

Other early initiatives on anti-corruption include the introduction of the International Chamber of Commerce Rules of Conduct to Combat Extortion and Bribery (ICC Rules) of 1977, also due to the series of corruption scandals in the mid-1970s. ICC Rules were revised and updated in 2005; they are of a general nature and are promoted as a form of self-regulation and good practice, meaning that they lack legal effect (UN Global Compact, 2006). Around the same time, the first International Anti-corruption Conference (IACC) took place in Washington in 1983 (Blalock, 2001). Since then, and with the support of Transparency International, IACC, regularly takes place every two years in various places around the world as a 'premier global forum for bringing together heads of state, civil

society, the private sector and more to tackle the increasingly sophisticated challenges posed by corruption' (IACC, 2018).

In the second stage, anti-corruption took off as a movement in the 1990s through its internationalization and institutionalization (McCoy & Heckel, 2001). A particular role in this development was played by the shift in the agendas of the World Bank and the International Monetary Fund which framed corruption as 'cancer'[2] (Wesberry, 1997). Corruption was found to increase inequality and hurt the poorest and weakest layers of society the most, erode trust in governments and institutions by wasting public resources, undermine the rule of law, impede investment and especially in social services and welfare, and to increase the cost of doing business by distorting market mechanisms and fair competition. In addition, in 1993, the leading anti-corruption INGO, Transparency International (T.I) was founded; T.I, is a global organization exclusively dedicated to stopping corruption and promoting transparency, accountability and integrity at all levels and across all sectors of society worldwide (T.I, 2019). By the mid-1990s, corruption was no more just a matter of political will but also a matter of economic policy (McCoy & Heckel, 2001), attracting wide attention from the media. The *Financial Times*, for example, declared 1995 as the year of corruption (cited in Tanzi, 1998).

The shift of institutional actors towards an economic view of corruption had its roots in the growing realization of the power, role, and importance of MNCs in the global economic system (Babic et al., 2017; Strange, 1988). Being able to transcend spatial borders and therefore evade the regulatory nets of national agencies, MNCs were seen as 'breeders' of corruption (Wrage & Wrage, 2005). The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (OECD Convention) of 1997, and the UN Convention against Corruption (UN Convention) of 2004 aimed at addressing exactly this regulatory gap (Moran, 1999). The OECD Convention and treaty criminalized the bribery of foreign officials in all member states and attributed an international character to anti-corruption. Through its peer-review monitoring mechanism, it pushed its member states to update their anti-corruption legislation to match the Convention's

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[2] Corruption was first framed as 'cancer' by World Bank's President James Wolfensohn's in his speech in the World Bank/IMF 1996 Annual Meetings in Washington, DC.

provisions and in so doing to create a uniform legal framework for MNCs based within the territories of the OECD member states (Getz, 2006).

The UN Convention only added to this effort. It is similar to the OECD Convention in that it aims to establish a common legal framework and a peer-review mechanism to ensure the implementation of anti-corruption, but it differs in scope and reach. In contrast to the OECD Convention's focus on bribing foreign officials, the UN Convention adopted a broader definition of corruption which includes also extortion, embezzlement, misappropriation of funds, trading in influence, abuse of functions, and illicit enrichment in public to private, and private to private relationships (Argandoña, 2007). In terms of reach, the UN Convention has been characterized as 'the first genuinely global, legally binding instrument on corruption and related matters' (Argandoña, 2007, p. 485) as opposed to OECD's limited application in its 36 member-states. It was ratified by 159 member states by 2012 (Joutsen & Graycar, 2012). Moreover, the UN Convention is not restricted to governments and their role in combating corruption. It calls for attention and awareness of a wider audience including public, private, and civil society actors across the globe.

In its third and current stage, anti-corruption started to be internalized in the operation of public and private organizations as a matter of good governance (Jakobi, 2013b). Taking its departure from the recommendations and requirements of the OECD Guidelines for Multinational Companies, and major treaties such as the OECD and UN Conventions, anti-corruption has been organizationally operationalized through a set of mechanisms and corruption control measures. These measures include but are not limited to corruption risk assessments, due-diligence, training, book-keeping, whistleblower hotlines, codes of ethics, and CSR reports just to name but a few. Along with the diffusion of anti-corruption measures, the profession of the compliance officer also emerged as a default management position to advice corporate leadership in matters related to anti-corruption (Sampson, 2016). A particular role in the internalization of anti-corruption was also played by the UN Global Compact (UNGC) and its tenth principle that Businesses should work against corruption in all its forms, including extortion and bribery (UNGC, 2019). By 2019, the UNGC has been voluntarily signed by almost 10,000 companies from 159 countries. It requires that signatory companies will annually report on their achievements with regards to the UNGC's ten principles (Voegtlin & Pless, 2014)including anti-corruption.

In addition, anti-corruption's course towards its internalization as organizational and corporate function was greatly facilitated if not promoted by a wave of private, collective, and non-public organizations offering advice and guidance on the importance, implementation, and consolidation of a 'culture of integrity' in organizations. The International Chamber of Commerce for example through regular publication urges companies to introduce, implement and regularly review their organizational compliance function so to counter corrupt practices (International Chamber of Commerce, 2017).In so doing, such organizations and initiatives raise attention and therefore the prospect and need for anti-corruption measures to be implemented (Hansen, 2011, 2012). Similar approaches to spreading anti-corruption have been increasingly adopted and used by accountancy, consultancy, and law firms offering anti-corruption services globally to induce companies to the practice of anti-corruption. Indeed, as Sampson (2010) points out, anti-corruption nowadays resembles more to a multi-million 'industry' than the concern US authorities once attempted to address.

3. Anti-corruption and fieldwork in Denmark and China

In this section, I discuss the reasons underlying my choice to conduct fieldwork in Denmark and China. To start with, anti-corruption has been quite popular as a policy and movement in both countries during the last decade, although for different reasons. In Denmark, it was the introduction of the UK Bribery Act in 2010 which played an alarming role mostly for Danish MNCs. Between the mid-1990s and 2010, corporate anti-corruption in Denmark has been considered as part of the broader CSR agenda and therefore within the voluntary discretion of businesses to project an ethical social profile (Morsing & Thyssen, 2003). According to Jensen (2014), Denmark's excellent performance in Transparency International's Corruption Perception Index (CPI) as one of the least, if not the least, corrupt countries in the world as well as the 'high level of quality of government and global position as a best performer in terms of fighting corruption' (Jensen, 2014, p. 2) can be traced back to the 17th century and Denmark's state building process.

Such a background and tradition on curbing corruption may be one of the reasons why in Denmark the development of anti-corruption in the private sector took place after 2010; within Denmark there was not much reason to do so. However, suspicions for the involvement of Danish companies in illegal transactions (Volcker et al., 2005), and the growth of the Danish economy and exports,

especially towards developing countries, uncovered the risk of corruption and exposure to anti-corruption rules and legislation as especially threatening to the Danish competitive advantage of sustainable development (Dansk Industri, 2014). Evident of this shift has been the tightening of the rules regarding CSR reporting including anti-corruption by the Danish government with the Danish Financial Statements Act (Danish Commerce and Companies Agency, 2010), the establishment of anti-corruption function in compliance departments in major Danish MNCs, and collective initiatives such as the organization of the International Conference on Anti-Corruption (IACC, 2018), and the Fight Against Facilitation Payments Initiative (FAFPI, 2018).

China, the second largest economy in the world, experienced an increased interest in anti-corruption during the 2010s as well. Because of the country's unprecedented economic growth and social development, by 1994, corruption had penetrated the social, political, ideological, economic, and cultural life of the country leading to widespread social unrest (Kim, Li, & Tarzia, 2018). The causes of corruption have been attributed to several factors such as the lack of firm democratic institutions, the culture of Guanxi, economic and social inequality, as well as the current transitional phase of the country's economy and society (Berger, Herstein, Silbiger, & Barnes, 2018; Dong & Torgler, 2013; He, 2000; Holmes, 2015). In 2012, President Xi Jinping famously stated his determination to catch both 'tigers' and 'flies' corrupting the country and the party (Branigan, 2013). His anti-corruption campaign has led so far to hundreds of thousands of investigations and had 1,5 million officials tried and punished (The Washington Post, 2018). Yet China's rankings in the Transparency International's Corruption Perception Index remain quite stable and regardless the Chinese government's efforts to counter the phenomenon. More recently, the focus of the Chinese government's endeavors to curb corruption shifted towards the private and financial sectors of the Chinese economy including foreign MNCs. GlaxoSmithKline, a British pharmaceutical company, for instance, has been found, prosecuted, and fined for the bribery of health professionals in China (Moore, 2014). Developments such as this have caused foreign MNCs in China to re-evaluate and reinforce their anti-corruption practices.

Both countries therefore offered equally fertile environment for fieldwork. I started my fieldwork in Denmark and approached companies from different sectors including manufacturing, pharmaceutical, retail, mining, logistics, tobacco, medical devices, and energy. Anti-corruption and compliance

departments are 'global' in the sense that they are centrally positioned in the company's headquarters along with other strategic departments. Their usual title is 'Group Compliance' or 'Group Business and Ethics' departments, meaning that from their base in the headquarters they design, distribute, and control the company's compliance operations around the globe. In this sense, fieldwork in Denmark offered an excellent opportunity to meet and interview experts who were actually pioneers regarding the establishment of compliance departments in Danish companies, and had much to offer in terms of lived experiences, successes and failures, challenges and future plans for further development. They were also an excellent initial source of data regarding the operation of a compliance department, its place in the hierarchy, and definitely its network and connection with the senior management and other corporate departments.

While compliance departments in Denmark design, distribute, and control anti-corruption globally, the limited number of manufacturing or production sites accompanied by the country's non-bribing culture restricts access to the actual implementation of corruption controls. For a compliance officer in Denmark, implementation means the roll out of measures and controls across the company's subsidiaries where further elaboration and adaptation to local conditions and customs takes place. Even those compliance officers who were willing to travel to conduct training or onsite visits and evaluations were in effect restricted by the limited time and the large number of subsidiaries. To some extent, this is also the reason why most, if not all, have chosen a risk-based approach in curbing corruption; it gives them the opportunity to focus only where misbehavior is more likely to happen, and China, according to the CPI at least, is one of these areas of the world. I considered then that to acquire a complete view of the practice of anti-corruption, fieldwork in China was necessary.

China is one of the markets and economies into which Denmark and Danish companies are very much interested in expanding due to its massive population and vast economy. As a result, around 300 Danish companies[3] including major Danish MNCs, have established a subsidiary or operations in China totaling 3,7 % of Denmark's exports (World Bank, 2017). Although anti-corruption is a rather centralized function, due to cultural and practical matters most companies have established a compliance function in the Chinese subsidiary. I say compliance function and not department because as I learned during the process, compliance and its implementation in China has not been a full time

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[3] Information acquired from the Ministry of Foreign Affairs of Denmark and Statistics Denmark

job with the exception of a couple of MNCs; this is to say, anti-corruption duties were side-loaded to the legal department or attached to the Vice President of the local subsidiary. This has resulted in some difficulties in approaching and interviewing compliance officers and anti-corruption experts working for Danish companies exclusively despite the contacts and confidence I had from Denmark. I decided then than I should be more open regarding my target group. After all, they all apply industry 'best practices', they attend similar conferences, use the same consultancies, are subjects of the same legal framework, and therefore their behavior is to some extent under similar isomorphic pressures.

I used LinkedIn to locate compliance officers, managers, and experts in Beijing. My assumption was that if they had an English profile and if they had worked for Western companies, there was a good chance that they would meet me for an interview and I was right. Several national Chinese compliance officers answered and accepted to meet me for an interview and in so doing offered also a different approach to anti-corruption. Along with the view that corruption is a bad thing and should stop for instance, some interviewees pointed out also that corruption is a form of social justice in the sense that the entrance of multinational companies in the Chinese market is unfair for local companies in terms of competition. 'How can local breweries compete with Carlsberg other than by paying bribes to local bars and supermarkets to promote their local beer', an interviewee rhetorically asked. Surprisingly, Chinese people were quite open in discussing corruption and anti-corruption in China, how it has changed in the last 20 years, how this has changed their work as compliance officers, what strategies they have been using to convince their colleagues about the merits of compliance, why and when they failed, and why they have succeeded. Many of the quotes used in papers #1 and #2 for example, regarding translations and the visibility of the problem of corruption, are thanks to these interviewees who had actual stories to tell from their time as compliance officers implementing anti-corruption policies.

I was happy to find out also that compliance and anti-corruption events were more often than not held by several Chinese authorities and organizations such as the Standardization Administration of China (SAC), and most importantly also translated into English. Thanks to one of my interviewees, I was added to the mailing list of the SAC and received invitations to and participated in anti-corruption events including the ISO Summit in Shenzhen. In this respect, China was an excellent choice for fieldwork. Its contribution was smaller in quantity than the fieldwork I did in Denmark but lacked

nothing in terms of quality. Most importantly, without it, I would have never had the opportunity to acquire a complete view and understanding of anti-corruption as it happens from its design in the headquarters to its implementation across the world.

4. Studying anti-corruption

In this section, I briefly review the anti-corruption literature with the objective to 'set the scene' for this research project. I build on Jancsics' (2014) recent review on corruption studies and I develop his typology to include anti-corruption as well. Jancsics takes distance from debates on how corruption should be defined and whether the definition should include the public and private sectors or the demand and supply sides for corruption. Instead he uses corruption as an umbrella concept based on four conceptual elements: first, corruption is an organizational informal/illegal and secret exchange of formally allocated resources; second, at least one corrupt party has some sort of affiliation with the organization where the exchange or illegal activity takes place; third, corruption requires at least two corrupt parties; and fourth, corruption is always an act deviating from social rules. With these conceptual elements in mind he proceeds and categorizes corruption studies within the three broad social sciences paradigms namely rational choice, structural, and relational (Table 1). For each approach he discusses several subcategories and corresponding literatures.

For example, rational choice approaches include conceptualizations of corruption as 'bad apples', client-agent, and principal-agent dilemmas within the economics and political science literatures. Likewise, the structural approach includes social and material structures shaping behavior, while in the relational approach horizontal and vertical networks. Jancsics criticizes rational choice and structural approaches on corruption as substantialist and mechanical since they cannot depict the complexity of social reality and therefore corruption as well (Crossley, 2005). In contrast, he argues that the relational approach with its default focus on observing 'real-life cases' seems more promising considering that corruption takes place in actual human interactions.

Having this framework as my point of departure I proceed along similar lines; I also use the term 'anti-corruption' as an umbrella concept to cover a very broad area of study in which the same phenomenon appears under various names such as anti-bribery, corruption control, ending corruption, ethics etc. While it is not this dissertation's purpose to compare anti-corruption with each and every

other similar term, I argue by the end of this literature review that due to the diverse and fragmented studies on anti-corruption, more focus and attention is required on the global anti-corruption discourse and its implementation in corporate settings. Moreover, for each conceptual approach on corruption I will briefly discuss and when possible and appropriate, revise and update Jancsic's review. Further, I will review and add to the broadly understood anti-corruption literature highlighting major subcategories, as well as similarities and differences between various disciplines.

	Rational actor approach	Structural approach	Relational approach
Level of analysis	Micro	Macro and middle	Middle[4]
Motivation/constraint to participate in corruption	Maximize monetary rewards and minimize costs	Forced by structural constraints	Profit from the associations with others
Exchange form	Economic/market	Driven by norms and material structural constraints	Reciprocal, often non-material
Relationship form	Impersonal, short-term	Relationship between individual and collective entities	Interpersonal, long-term
Corruption from an organizational perspective	Corruption is an exceptional problem within the organization: bad apple	Corruption is systematic products of collective processes: bad barrel	Corruption is an informal exchange network behind formal organizational structures

Table 1: Major corruption approaches according to Jancsics (2014).

In its very basic function and understanding, anti-corruption is meant to counter corrupt practices. In other words, anti-corruption's starting point is to be a reaction to corruption. This is most evident in the rational and structural approaches but as I argue it fades away in the relational approach where anti-corruption is conceptualized as a network, assemblage, or industry that renders it a 'one size fits all' solution to a problem which is very complicated (Krastev, 2000). Such conceptualization raises a question regarding the objective of anti-corruption within a relational framework. If corruption is

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[4] The middle level of analysis oversimplifies the relational approach because it implies that the focus of the analysis is somewhere between the two extremes of micro and macro levels. Although this dissertation's ontology rejects such dichotomies, I will not change or discuss it further at this point for reasons of convenience. Ontological considerations will be discussed in the following chapters.

conceptualized as 'an informal exchange network behind formal organizational structures' (Table 1, 3rd column and row), how then is a formal 'anti-corruption' program, like those companies are expected to introduce in their operation, ever able to be effective against corruption?

Interestingly, this indication seems to be a generalized phenomenon; a finding of this review is that many of the passages on anti-corruption were found under various labels such as anti-bribery, corruption control, ending corruption, ethics, and fight against corruption or simply as remedies in studies on corruption. For example, in discussions on how corruption is normalized in organizations (Anand, Ashforth, & Joshi, 2005; Ashforth & Anand, 2003; Spicer, 2009), scholars offer suggestions for the de-normalization of corruption as well. Likewise, when reviewing the literature on economic psychology (Berninghaus et al., 2013; Rotondi & Stanca, 2015) I found that the results of their experiments offered ideas on how corruption could be curbed. This finding paves the way for two implications; first, that efforts to curb corruption were possible and in fact a matter of concern and study outside and parallel to the anti-corruption movement and discourse of the last two decades. Second, and following the first implication, that corruption and anti-corruption may be understood as complementary to each other rather than opposing concepts.

I argue that taking Jancsic's framework on corruption to review anti-corruption has both strengths and weaknesses. Its main strength is that it offers a quite rigid and simple structure to navigate through diverse research on such complex social issues as corruption and anti-corruption. Moreover, it allows the tracking of the phenomena of corruption and anti-corruption in relation to each other. By following, for example, how corruption has been conceptually developed in various academic disciplines we can also observe changes in its relationship with anti-corruption and vice versa. In so doing, the contrasting of corruption and anti-corruption and a critical examination of the latter when applied in corporations is enabled.

An overall weakness of utilizing this particular framework to review anti-corruption, I admit, is that it oversimplifies anti-corruption by reducing its conceptual richness to three quite broad and generic categories or social science traditions, namely agency, structure, and relational. Jancsic's relational approach, for example, refers strictly to corruption as the product of human relations where corruption and potentially anti-corruption are conceptualized as exchanges. In so doing, it leaves outside approaches where anti-corruption and corruption can be understood as socio-material practices,

networks, or assemblages of human and non-human elements to name but a few. For the purpose of this dissertation therefore, first, I use and discuss the theoretical approaches on corruption that I consider most fruitful for this thesis' purpose without claiming that the following literature review can be seen as a full review of corruption and anti-corruption studies. Second, I take advantage of both the strengths and weaknesses of Jancsic's framework; on the one hand, I utilize its simplicity to navigate through the richness of corruption and anti-corruption studies. On the other hand, I seek to contribute towards its identified weaknesses by exploring anti-corruption as a socio-material practice.

4.1 Anti-corruption as a rational choice

Rational choice models assume that actors act based on mere cost-benefit calculations without taking into consideration other factors such as context or past experience (Granovetter, 1985). Its logic is derived from liberal theories and neoclassical economics whereby the ultimate goal and path to social order rests on the utility maximization of each person separately (Foy, Schleifer, & Tiryakian., 2018). Society therefore is considered as no more than the sum of individuals, each of which seeks to maximize the utility of the choices that are available at any given time. As a result, social phenomena such as corruption happen exactly because some actors benefit from it. Rational choice approaches conceptualize corruption as any other benefit maximizing transaction between economic actors. If, for example, an actor calculates that profit from a corrupt practice exceeds the costs of doing so then this actor will proceed with the corrupt practice. Likewise, an actor will not engage with corruption if a cost-benefit calculation shows that the former exceeds the latter. It follows that rational choice studies take a micro-level of analysis exactly because corruption is considered a transaction between actors. The objective therefore of anti-corruption from a rational perspective is to prevent or disrupt a corrupt exchange between actors.

One of the main rational approaches on corruption has been the agent-principal dilemma. In this case, corruption is caused when the agent who is supposed to serve the principal's interests betrays his trust and decides to act according to his own interest and benefit (Shleifer & Vishny, 1993). Such corruption cases have been found in the relationship between governments and private actors or between private actors. With regards to the former, a common corrupt practice has been the case when public officials seek rents by taking advantage of state monopolies or when economic actors seek undue favors from public officials (Rose-Ackerman, 1999; Shleifer & Vishny, 1993). With

regards to the latter, corrupt practices may include bribery of procurement officers of other companies or employees getting kickbacks for preferring certain suppliers (Argandoña, 2003, 2005; Goel, Budak, & Rajh, 2015). A major objective of anti-corruption policies therefore derives from the need of the principal to minimize the incentives or structural deficiencies creating opportunities for corruption to agents.

Along similar lines, economic and political sciences research suggested the privatization of centrally organized economies as an early and major anti-corruption policy (Spicer, McDermott, & Kogut, 2000; Tanzi, 1998). This policy was based on the argument that the involvement of governments in the market distorts its function and creates incentives for corrupt behavior both to public employees and private firms (Acemoglu & Verdier, 2000; Treisman, 2000; Tullock, 1996; Williams, 1999). However, the experience from Eastern European countries and China respectively showed that the liberalization of the economy may also blur the boundaries between public and private sectors and thus create opportunities for corruption as well (Batory, 2012; Deng, Zhnag, & Leverentz, 2010; Lovell, 2005). Scholars, for example, have shown that in the case of China, the privatization of a large number of state owned companies maintained if not increased corruption in the country (He, 2000).

Economists have suggested several other measures to eliminate corrupt behavior, focusing on disrupting the corrupt act through re-balancing the costs and benefits for the corruptible actor. Rose-Ackerman (1975), for example, urged policy-makers to rethink how governments approach and organize the purchase of products from the private sector because according to her, corruption is related to how state mechanisms function. Likewise, others have suggested incentives and punishment measures that would render corrupt acts less beneficial (Ades & Di Tella, 2003; Bardhan, 1997, 2006; Rose-Ackerman, 1986). These may include incentives for people to report corrupt cases (Abbink & Wu, 2017; Neha Tudu & Pathak, 2014), new and better enforced laws (Fisman & Miguel, 2007), the improvement of competition in the market and between public officials (Gulsun Arikan, 2004; Ryvkin & Serra, 2018), as well as an increase in the wages of public officials so they can resist bribery (Acemoglu & Verdier, 2000; Becker & Stigler, 1974).

However, these measures have been challenged for their effectiveness and compatibility. Ades and Di Tella (1999), for example, found that increased wages for public officials reduce the effectiveness

of competition in curbing corruption. Similarly, from an economic psychology perspective, scholars utilizing experiments have tried to test some of the above policies (Abbink, 2000; Abbink, Irlenbusch, & Renner, 1999; Armantier & Boly, 2011; Barr & Serra, 2010; Berninghaus et al., 2013; Lambsdorff & Frank, 2010) with debatable results for the effectiveness of anti-corruption measures. Armantier and Boly (2011), for example, reproduced a corruption scenario in which graders were offered a bribe with a demand for better grades. They found that not only were higher bribes more efficient in achieving the goal but also that higher wages have at least an ambiguous effect in controlling corruption.

Along similar rational lines, organizational scholars have researched the phenomenon of 'bad apples' in organizations as causal to corruption. Bad apples are individuals whose unethical behavior is attributed to personal quality issues such as cognitive development, idealism, job satisfaction, age, and gender to name but a few (Kish-Gephart, Harrison, & Treviño, 2010; Treviño & Youngblood, 1990). Researchers have shown that the problem of 'bad apples' can be spread out in the organization, causing further problems due to its 'asymmetric and deleterious effect on others' (Felps, Mitchell, & Byington, 2006, p. 176). It follows that anti-corruption measures seek to first isolate or protect the organization from such individuals and second, prevent their unethical behavior spreading out further to the organization (Andersson & Pearson, 1999; Felps et al., 2006; Misangyi et al., 2008). According to Felps et al. (2006) protecting the organization from such individuals requires either removing the deviant person, protecting the rest of the team from their influence, or motivating them to change.

It follows that rational choices approaches to anti-corruption focus on how to prevent a corrupt from taking place by influencing the decision making process of individuals. There are two comments we can make here; first, rational choice anti-corruption requires a corrupt practice for it to happen. We need to know what the corrupt practice is before we apply any punishment or incentives against it. Second, knowing what the corrupt practice is makes things complicated as corrupt exchanges take place usually under privacy and secrecy. The use of experiments thus simulating various scenarios to test the behavior of people can offer only limited insights into the actual exchange. One of this limited insights concerns also the works of compliance officers who are tasked with ensuring compliance with anti-corruption laws and what are the means, strategies, and reasoning they employ to achieve their goal.

4.2 Anti-corruption as a social structure

Structural corruption refers not to individual acts as in the rational choice paradigm, but to a social phenomenon institutionalized and embedded in social relations of power (Anders & Nuijten, 2007). What determines corrupt behavior here is not self-interest or utility maximization but rather the broader context the actor works and lives in. From an analytical perspective, therefore, structural approaches focus on corruption as it is happening in middle and macro levels of analysis such as groups of people, organizations, countries, and the international scene. It is important to highlight here that in many of the studies mentioned below, the analytical focus is not on anti-corruption measures and their application but rather revolves around all sorts of initiatives supporting anti-corruption as the expected and appropriate behavior. This I suggest symbolizes the start of a transition from anti-corruption measures to anti-corruption as a discourse distant from corruption and the necessary organizational reactions to such a problem per se. The consequences of this transition will be further discussed in the next sub-chapter of this review since it has sparked a number of critical and relational works on anti-corruption and its relationship to the social problem of corruption.

Jancsics argues for two distinct kinds of structural corruption; normative and material. Normative structures refer to social norms as powerful and consistent behavior regulative rules (Feldman, 1984). Actors tend to conform to social norms since they appear as a form of 'social wisdom' which facilitates on the one hand the decision-making process of actors and on the other hand prevents them from thinking critically (Lapinski & Rimal, 2005). Thus we have the well-studied phenomenon of 'bad apples' produced by 'bad barrels' whereby otherwise ethical people engage in corrupt practices in their workplaces (Ashforth & Anand, 2003; Kish-Gephart et al., 2010; Treviño & Youngblood, 1990). Other examples where the normative environment explains corruption range from national cultural and religious beliefs to organizational, group and family norms. Corruption in many East Asian countries, for example, is considered to be related to informal relations such as the traditions of 'guanxi' and 'yongo' in China and South Korea respectively (Berger et al., 2018; Horak & Klein, 2016; Yang, 1994).

The majority of works on corruption from a structural perspective belong to organization and management studies in which corruption and potential counter measures have been suggested with the aim of changing or replacing such norms. Scholars have shown how corrupt behavior becomes

normalized and institutionalized in organizations (Anand et al., 2005; Ashforth & Anand, 2003; Frei & Muethel, 2017; Zyglidopoulos, Fleming, & Rothenberg, 2008) and consequently how such a situation can be de-normalized (Anand et al.; Arellano, 2017; Lange, 2008). Regarding the prevention of corruption, business ethics scholars using survey research and case studies have found positive evidence for the impact of measures such as raising awareness among employees through regular training and communication (Hauser, 2018; Kaptein, 2015; Verma, Mohapatra, & Löwstedt, 2016), the nurturing of an ethical culture in the organization (Fichter, 2018; Paine, 1994; Schwartz, 2013), and the exemplar ethical behavior of corporate leadership (Miska & Mark, 2018; Pasricha, Singh, & Verma, 2017; Sims, 2000). With regards to reversing cases of rationalized corruption, scholars argue for specific strategies and generalized theoretical corruption-control models (Anand et al.; Lange, 2008; Misangyi et al., 2008; Pfarrer, Decelles, Smith, & Taylor, 2008). Anand et al., for example, suggest companies stop denying the problem, engage external actors, and employ preventive measures as soon as possible.

Gradually it became a common understanding among scholars that as a multidimensional problem corruption requires also an multidimensional answer (Ashforth et al., 2008; Lange, 2008; Zyglidopoulos, 2016; Zyglidopoulos, Hirsch, de Holan, & Philips, 2017) to, among other things, take into consideration both behavior shaping norms and norm shaping behavior. Misangyi et al. (2008), for example, makes the case that institutional entrepreneurs are necessary to reverse corrupt institutional logics, and as della Porta recently put it (2017, p. 664), 'Individuals belonging to different societies and organizations can be pushed towards corruption by the nature of their internalized values, and by social pressures'. This realization led to a wave of interdisciplinary studies seeking to merge sociological and economic approaches to the study of corruption and anti-corruption. Indeed, scholars of New Institutional Economics (NIE) and New Economic Sociology (NES) have tried to apply the above in studies of corruption and anti-corruption. NES scholars seem to converge and discuss on the importance of generalized trust as 'a crucial factor in anti-corruption' (Bjønskov & Paldam, 2005; Uslaner, 2005). These studies find that an increase in trust has significant impact on corrupt behavior. They are reserved, however, on whether an increase on anti-corruption has a similar impact on trust among actors. NIE scholars depart from the opportunism of actors and examine how this behavior shapes corruption as a phenomenon (della Porta, 2004; Lambsdorff & Teksoz, 2005; Pechlivanos, 2005). Pechlivanos' (2005) findings for example challenge the well-known anti-

corruption measure of transparency by showing that unrestricted information flows between parties may be equally helpful to opportunist actors intending to misbehave.

Anti-corruption has also been studied as a norm along the lines of similar institutional reactions to other transnational crimes such as piracy, drug trafficking, slavery, terrorism, money-laundering and prostitution (Andreas & Nadelmann, 2006; Getz, 2006; Jakobi, 2013a; McCoy & Heckel, 2001; Nadelmann, 1990). Global governance, international relations, and business scholars treat anti-corruption as an autonomous regime regulating the behavior of public and private actors. This regime consists of governments, NGOs, and international organizations introducing regulations and rules covering virtually the whole public-private-society spectrum. A common area of concern in these studies is the role of 'norm or moral entrepreneurs' and 'organizational platforms' who mobilize political and popular support domestically and internationally (Finnemore & Sikkink, 1998; Nadelmann, 1990). Indeed, Jakobi (2013a), maintains that the US government and Transparency International played a significant role in establishing and diffusing anti-corruption internationally, while Rose (2015), argues that depending on the 'organizational platform's' setup, the effect of anti-corruption in national legislation differs from case to case. On the same matter of the effectiveness of anti-corruption and in line with Nadelmann's conclusion on global prohibition regimes, Getz (2006) argues that the effectiveness of the anti-corruption regime is rather limited by the complexity of the phenomenon of corruption.

Besides normative structures, material structures refer to 'materially constrained levels and imperatives of the social system' and they are to be understood as durable norms which have produced material constrains (Alexander & Smith, 1993, p. 160). For example, a national culture is greatly delimited by the country's physical borders. This is to say, corruption happens when such factors as the structure of an organization, country or system and the ways these function can be perceived as facilitators of corrupt behavior. Again, as the experience from the 'new democracies' has shown in political and business studies, democratic institutions and economic growth, for instance, maintain if not feed corruption in the short-term (Jetter, Agudelo, & Hassan, 2015; Sung, 2003; Treisman, 2000). Likewise, while competition appears as negatively related to corruption on the national level, it has been positively related to corruption on the organizational level (MacLean, 2001; Montinola & Jackman, 2002; Treisman, 2000). Scholars have found, for example, that under conditions of

competition, overly profit-minded managers and companies set unrealistic financial goals pushing their employees to engage in illegal activities (Ashforth & Anand, 2003; Brief, Buttram, & Dukerich, 2001). Similarly, survey research shows that corruption is more likely to happen within specific structural conditions such as company size, sector (Transparency International, 2011), and lack of regulation in certain areas of corporate activity. According to OECD's Foreign Bribery Report (2014) for example, extractive and construction industries are more prone to corruption than manufacturing.

With regards to the latter, much attention has been drawn to national, international and global anti-corruption regulations. Legal scholars, for example, examine the effectiveness of old and new anti-corruption legislation such as the FCPA and UK Bribery Act respectively (Brewster, 2017; Koehler, 2009; Rose, 2012; Weismann, 2009; Yeoh, 2012). Likewise, business ethics scholars examine the role and effectiveness of international treaties on anti-corruption such as the OECD and UN Conventions (Apke, 2001; Argandoña, 2007; Darrough, 2010; Jongen, 2018; Moran, 1999; Pacini, Swingen, & Rogers, 2002; Salimbene, 1999). Findings show that rules and regulations are not so effective when isolated from a broader anti-corruption framework. On the matter of sector-wise corruption, business scholars have analyzed multi-stakeholder and private initiatives aiming at reducing corruption. Drawing on case studies such as the Maritime Anti-corruption Network (MACN), and the Extractive Industries Transparency Initiative (EITI), scholars argue for the transformative influence of such initiatives both on companies and governments alike (Dávid-Barrett, 2019; Rose, 2015a). Lastly and regarding national cultures and corruption, the focus has been more often than not to the techniques utilized to measure corruption. One of the most discussed indices within international relations (IR) and business studies is the Transparency International's Corruption Perception Index (CPI) which ranks countries according to their perceived corruption. The success of the CPI in alarming public and private actors on the risks and costs of corruption allowed Wang and Rosenau (2001, p. 40), to call Transparency International an 'agent of change' on a global scale. There have been, however, a number of scholars who remain skeptical regarding the broader effects of such measurements (De Maria, 2008; Gilman, 2018; Kimeu, 2014; Larmour, 2005). De Maria (2008), for example, argues that not only the CPI but also the whole anti-corruption movement is bound to serve Western economic and geo-political interests.

Structural approaches to anti-corruption focus on altering the social structures within which corrupt practices take place and not the behavior and decision making of people directly. They rest on the establishment of a normative environment which ideally would prevent people from misbehaving. I should mention here that we also witness the start of a transition from a structural approach to anti-corruption in the form of corruption control measures to an anti-corruption norm and discourse. This becomes more evident in the review of anti-corruption studies especially in the international relations, global governance, and international political economy academic disciplines where anti-corruption is understood as a 'global' phenomenon or norm regulating the behavior of corporations. This means that at least for these studies the focus is more on how anti-corruption represents or reproduces the global economic system and society and less on its organizational application. This trend is evident and thus further discussed in the below section where anti-corruption as a relational phenomenon is presented.

4.3 Anti-corruption as a relational phenomenon

Jancsics argues for a third conceptualization of corruption as a relational phenomenon. Corruption is understood neither as an exchange relationship between two actors, nor as the outcome of structural pressures on actor behavior but rather as deriving from the associations of people with one another. In this sense, a relational model of corruption integrates elements from both the rational and structural approaches. From the rational approach, a relational understanding of corruption borrows the utility maximization element. Indeed, people form associations because they benefit from these associations although that benefit may not be monetary or immediate (Lawler & Hipp, 2010). From the structural approach, the relational model borrows the importance of the context where corruption is produced or sustained as part of a web of social relations (Shore & Haller, 2005). Corruption therefore takes an 'informal network' form whereby its performance may be illegal but at the same time is obvious and necessary as a means to maintain social cohesion, stability, and order (Smith, 2007). In many cultures, building and maintaining long-term informal personal networks is necessary for fulfilling and achieving any goals and ambitions. In some cases, such as the Korean tradition of 'yongo', the ties constituting it are to a great extent predefined and given by birth so there is not much individual choice. Yongo and similar traditions like the Chinese 'guanxi' are considered necessary for doing business in South Korea and China respectively (Lin, 2004), yet are potentially sources of corruption

according to Western standards (Berger et al., 2018; Horak, Taube, Pac, & Manag, 2016; Yang, 1994).

Anthropologists have looked into corruption in local settings (Gupta, 1995, 2005; Haller & Shore, 2005; Harrison, 2006; Torsello & Venard, 2016) and argue for the importance of taking into consideration the social context before applying the western concept of 'corruption'. They show that local customs and traditions of gift giving and relationship building in various settings across the world little have in common with bribery as understood in the Western context. Yang for instance (1994, p. 108), argues that 'the art of 'guanxi' cannot be reduced to a modern western notion of corruption because the personalistic qualities of obligation, indebtedness, and reciprocity are just as important as transactions in material benefit'. Anthropologists have also looked into the anti-corruption agenda questioning its practice and discourses (MacLennan, 2005; Sampson, 2015, 2017). Sampson (2010, p. 261), for example, argues for an anti-corruption 'industry', the discourse and practice of which enables it 'to coexist along with the corruption it ostensibly is combating'. In a similar vein, others question the motivation and objectives of the anti-corruption agenda and call for more attention on who and why talks and engages with it (Gupta, 1995; Harrison, 2006).

Along similar lines, an increasing number of scholars have sought to analyze the anti-corruption industry by critically examining its discourses and practices (Bukovansky, 2006; Everett , Neu, & Rahaman, 2006, 2007; Hansen, 2011, 2012; Hansen & Tang-Jensen, 2015; Hindess, 2005; Lord, 2013; Slager, 2017). These studies build also on a relational understanding of corruption accompanied by an interest in how anti-corruption is organized beyond mere human associations to include also non-human entities and notions such as socio-technical and material governmental and private associations. Anti-corruption therefore appears as not only a response to corruption but also an autonomous, if not independent, assemblage of heterogeneous elements, the study of which allows for an understanding of the underlying assumptions of anti-corruption. Hansen and Tang-Jensen (2015) examine how legal experts in a Danish law-firm practice due-diligence on behalf of a corporate client. They find that in practice, the language and methods used on the micro-level by anti-corruption practitioners are to some extent aligned and reproduced with the values exhibited by the macro-level anti-corruption regime. In the same vein, Slager (2017), analyzes the discourses of accountants and shows how anti-corruption risk is constructed. She warns that an understanding of anti-corruption as

a risk comes at the expense of other alternative and more collective forms of fighting corruption such as business ethics and corporate integrity culture.

Indeed, as it has been pointed out by Garland (2003), a risk governance approach differs from 'traditional forms of moral and judicial reasoning' because it borrows and combines elements both from the compliance and business ethics approaches. Risk management neither seeks to blame and punish individuals as a compliance approach implies, nor does it expect each and every person to abide by the same ethical code as a business ethics approach prioritizes. Rather it rests on the premise that since individual actions can have an impact on many then the responsibility is shared and risks can be managed collectively (Garland, 2003). It follows that risk assessments can locate primary risks such as geographical and functional dangers, but can also initiate what Hardy and Maguire (2016) called a 'riskification' process or else a discursive practice by which organizational members are enrolled to the management of such risks. In this sense, anti-corruption risk seems more like an 'organized uncertainty' (Power, 2007) since its discursive construction (Slager, 2017) resembles less danger and more an opportunity for value creation (Andersen, Garvey, & Roggi, 2014; Hansen, 2011).

Following the above developments, a conceptual transition can be discerned from a normative approach to corruption studies and the controls employed to eliminate it, to anti-corruption as a discourse. Corruption control implies that there is indeed an intentional and opportunistic deviance in organizational settings (Lange, 2008) and therefore there is a need to contain this phenomenon by employing certain measures. As we have seen above, such an understanding of corruption appeared in management and organization studies mostly within norm-based and structural approaches whereby organizations were understood as 'bad barrels' (Ashforth et al., 2008; Pinto, Leana, & Pil, 2008). The term 'anti-corruption', in contrast, has risen as a term in anthropological, international political economy, and global governance studies in which anti-corruption has been understood as an anti-policy and discourse (Hansen, 2012; Jakobi, 2013a; Sampson, 2016). According to Walters (2008), an anti-policy is 'a space of policies, measures, programmes… which derive whatever legitimacy they enjoy from the claim that their objective is to repress bad things'. In other words, anti-corruption is much broader than corruption control since measures are only a part of an anti-corruption policy. Within this broader understanding of anti-corruption scholars have argued that

corruption and anti-corruption may not be as opposing to each other as one would expect but rather coexist in tandem (Sampson, 2010). Indeed, Hansen (2011) for example shows that anti-corruption does not only seek to repress corruption but also creates commercial opportunities for business, while others have questioned the capacity of anti-corruption to battle corruption (Krastev, 2000, 2004).

To sum up, in this section anti-corruption studies have been briefly reviewed. Table 2 shows a summary of the dimensions revealed. To a great extent, anti-corruption has been embedded or has been part and parcel with corruption studies. This is most evident in the rational choice approach in which experiments simulate both prone to corruption situations and proposed solutions. There has also been an increasing number of studies, structural and relational, presenting anti-corruption as a norm and network in itself respectively. Structural approaches detach anti-corruption from the micro or individual level and consider it as a shared response. Under the relational approach, corruption is understood as an informal network of human and non-human elements embedded in social relations and thus is more or less inevitable. The focus, therefore, of anti-corruption is not on directly eliminating corruption but rather on how to cope with or manage it (Hansen, 2011; Sampson, 2010). In short, I argue first, that the anti-corruption literature remains fragmented despite efforts to bring together theoretical traditions (Ashforth et al., 2008; Lambsdorff et al., 2004), and second that the relational approach seems the most promising direction in advancing our understanding of the phenomenon of anti-corruption because of its ability to accommodate concepts not by prioritizing one over the other or integrating one in the other, but rather by relating them as components of the practice of anti-corruption.

Taking departure from the above findings, there are three areas where I believe contributions can be made by this study. First, although scholars have realized the need for a multi-dimensional approach to corruption and its control (Ashforth et al., 2008; Lambsdorff et al., 2004; Zyglidopoulos, 2016; Zyglidopoulos et al., 2017), these efforts have remained mostly on theoretical and conceptual models and levels. As a result, anti-corruption literature and research remains fragmented and divided between theoretical concepts such as agency and structure rarely able to 'commensurate with the scope and depth of the problem of corruption' (Ashforth et al., p. 671). In the few cases in which such integration was attempted, ontological considerations have raised further confusion instead of

treatment. New institutionalism approaches, for example, consider 'individuals, organizations, or alliances of such social actors' alike as institutional entrepreneurs (Misangyi et al., 2008, p. 766).

Anti-corruption		
	Rational actor approach	**Structural approach**	**Relational/practice approach**
Level of analysis	Micro	Macro and middle	'Middle' (flattened)
Focus	Actor interaction and decision making	Social and material structures/patterns that go beyond individual acts	Anti-corruption practices (situated and recursive activity)
Methods (indicative)	Experiments, mathematical models	Case studies, interviews	Discourse analysis, praxiography, ethnomethodology
Findings	Incentives and punishments to prevent or disrupt corrupt exchanges between individuals	Measures towards changing the social structures of corruption (corporate culture)	The organization of anti-corruption (risk management, industry, assemblage, network, practice, discourse)

Table 2: Approaches to anti-corruption

Moreover, as the above discussed relational approach to corruption promises, anti-corruption consists of a wide range of actors, organizations, indexes, events, connections, mentalities and rationalities, discourses, written and unwritten rules, texts, and knowledge also rarely addressed as organizational features and tensions of the anti-corruption *assemblage* verifying the fragmentation of anti-corruption studies (Hansen & Tang-Jensen, 2015).

Evident of the above is the use of a level-wise ontology separating individuals, organizations, and the global area of activity from one another. As a result, the global anti-corruption norm and discourse (Bukovansky, 2006; Hansen, 2017) seem distant from norm-based approaches on organizational corruption (Ashforth & Anand, 2003; Ashforth et al., 2008; Zyglidopoulos et al., 2008) since the former fails to see the particularities of such a complex problem in the organizational context. In contrast, the global anti-corruption industry (Sampson, 2010) advances a 'one size fits all' (Krastev, 2000) solution without, however, providing any guidance or indication as to how this solution should be implemented and applied in practice.

Second, corruption has been a central problem in the global economic system for more than two decades yet we know little about anti-corruption and the private sector (Calderón, Luis, Lvarez-Arce, & Mayoral, 2009; Hansen, 2011; Rodriguez, Siegel, Hillman, & Eden, 2006). Since the mid-1990s when corruption was understood as an economic matter, private actors and in particular multinational companies have played a pivotal role in establishing anti-corruption as a default corporate operation. Corporate anti-corruption refers to the means by which compliance officers tackle corruption in organizations. It usually appears in the form of compliance programs underpinned by a reasoning as to why corruption is bad for business and society and is materialized through a series of mechanisms and procedures such as employee training, background checks, risk assessments, whistleblower hotlines, reporting, internal audits, and codes of conduct (Miller, 2014). Rarely, however, has it been questioned how such reasoning and mechanisms are rationalized and put into practice in organizations such as multinational companies, who does so, and what are the intended or unintended consequences?

Third, although there has been an increasing interest in anti-corruption and its practice, relatively little is known about anti-corruption practitioners as the actual actors behind anti-corruption practice. On the one hand, rational choice approaches through experiments can only simulate at best corrupt transactions due to corruption's secretive and peculiar nature. On the other hand, and despite the various calls for consideration of action in institutional theories, structure and norms are still prioritized over agency. As a result, even when action appears it is still considered under institutional and universal pressures, limiting its agency. This overly strong focus on the theoretical 'struggle' between agency and structure creates a lack of realistic appreciation and study of anti-corruption as it happens. I suggest that an empirical focus on what practitioners do offers an excellent opportunity for examining anti-corruption and its constitution in action.

To address these drawbacks, I employ a social practice approach broadly construed and in so doing it reflects the elements listed under the 'relational/practice approach' heading (Table 2). As a social practice, anti-corruption is produced by the situated and recursive activity of compliance officers (Feldman & Orlikowski, 2011) who translate and integrate complex and abstract rules into everyday practice. Anti-corruption seeks not to eliminate corruption but rather to understand the management of such risks produced by corporate operation and discourses, and the organization of anti-corruption

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as an assemblage of socio-material elements. This study thus belongs to the relational approach of corruption and anti-corruption studies since as we shall see in the next sections, practices are inherently relational (Latour, 2005).

5. Research questions

The research question and sub-questions guiding this dissertation thus are (Table 3):

Main RQ	How is anti-corruption practiced in multinational companies?
Sub-question 1	How is anti-corruption integrated with business practices in multinational companies?
Sub-question 2	How is anti-corruption thought of in multinational companies?
Sub-question 3	How is anti-corruption practiced?

Table 3: Main research question and sub-questions

The first sub-question allows a look into how compliance officers translate and integrate anti-corruption into business. It pertains to what practitioners do (and say) when they perform anti-corruption and what strategies they use to turn abstract rules and regulations into practical advice and motivation for their colleagues. In so doing, the inquiry aims at an in-depth understanding of anti-corruption as a matter of the sociopolitical role of corporations. More concretely, the paper argues that the sociopolitical role of corporations is not to be found only in public-private or private to private interactions but also in the relationship of the corporation with its own members. With the second sub-question, I seek to understand the deep-seated thoughts and assumptions compliance officers hold and make when practicing anti-corruption. How do they think about their own role and responsibility in promoting and ensuring anti-corruption? How do they think about their colleagues and what does that mean for anti-corruption? The paper reveals an inherent tension in the concept of anti-corruption caused and reinforced by the bodies of knowledge it has been built upon namely compliance, business ethics, and risk management. The third sub-question differs from the previous two in that I take a broader perspective on anti-corruption. I focus on practices of anti-corruption which more often than not remain unnoticed and I examine how such practices constitute anti-corruption in practice through the produced intended and unintended consequences. In this sense, I

go even further than the previous sub-question by offering a view of anti-corruption beyond established norms, institutions, and interests.

6. Theoretical framework-practices in the study of social phenomena

The idiom 'practice' is used to cover a family of distinct theories and approaches in the study of human life and social order (Schatzki, Cetina, Savigny, 2001). Practice theories or practice-oriented approaches appeared in the 1970s in the works of, among others, Bourdieu (1977), Foucault (1982), Lyotard (1984), Giddens (1986), Taylor (1995), Latour (1987), and Garfinkel (1967) where the focus was on the transformation of social phenomena such as meaning, knowledge, power, activity, institutions, science, social classes, and language (Schatzki, 2001). As Ortner maintained (1984, p. 127):

> 'I will argue that a new key theoretical orientation is emerging, which may be labeled "practice" (or "action" or "praxis"). This is neither a theory nor a method in itself but rather, as I said, a symbol, in the name of which a variety of methods are being developed.'

Although each theorist conceptualizes and uses different terminology of what a practice is, they all seem to share the notion that human action and order are not the outcome of rational interests or norms but of practice (Reckwitz, 2002b). For Giddens, for example (1979, p. 5), social life is 'constituted in social practices' where 'what is said and what is done, rules imposed and reasons given, the planned and the taken for granted meet and interconnect' (Foucault, 1991b, p. 75). In a similar vein, Latour (2005; Law, 1992), see social order as a black box consisting of heterogeneous networks formed by interconnected actors acting on one another.

This first wave of practice oriented studies led to the 'practice turn in contemporary theory' (Schatzki et al., 2001), which offered a more refined, elaborated and materialistic framework on practices through the works of scholars such as Schatzki (1996) and Reckwitz (2002) (Nicolini, 2012). From that point on, practice approaches gradually took off and created a 'bandwagon' (Corradi, Gherardi, & Verzelloni, 2010) of practice-based studies in areas of interest as diverse as marketing (Echeverri & Skålén, 2011), consumption (Shove & Pantzar, 2005; Welch & Warde, 2017), (Ahrens & Chapman, 2007), routines (Feldman & Pentland, 2003), institutions (Lounsbury, 2008), innovation (Pantzar & Shove, 2010), strategy (Golsorskhi, Rouleau, Seidl, & Vaara, 2010), organizational

learning (Nicolini, 2011), organizational change (Czarniawska & Sevón, 1996), decision-making (Cabantous, Gond, & Johnson-Cramer, 2010), technology (Orlikowski, 2000), and international relations (Adler & Pouliot, 2011a; Bueger & Gadinger, 2014).

This new wave of practice theories differs in two ways from the previous one. First, some scholars insist more on the material aspect of practices. Earlier conceptualizations of practice were rather ideational in essence, probably due to at that time the emerging 'interpretive turn' (Rabinow & Sullivan, 1979). Since then, however, hardly anyone has argued against the importance and necessity of non-humans in social life and in practices in particular (Clarke, 2005). In this sense, practice theories share a lot with Actor-network theory although Schatzki (2002) remains skeptical regarding the attribution of agency to non-humans in practices since practice equals human activity. However, non-humans, according to Schatzki, can be the carriers of agency only as entities composing social orders along with people, artifacts, organisms, and things. In other words, non-human agency is a necessary part of the material arrangements within which practices happen. For the purpose of this study, we meet non-humans in the form of meeting rooms, computers, buildings, telephones, documents, maps, slides, and projectors as well as other kinds of resources in all three papers.

Second, according to Reckwitz (2002b), recent practice theories locate the site of the social in practice and not in minds, discourses, and interactions of humans as in mentalism, textualism, and intersubjectivism respectively. In the same vein, Schatzki (2002), criticizes Bourdieu's concept of *habitus* because it does not distinguish between action and practice. If practice is the smallest unit of analysis, then it must precede action according to him. Likewise, Reckwitz (2002), considers Foucauldian discourses and discursive practices as ontologically different from socio-material practices. Bacchi (2014), however, shows that by discourse, Foucault meant knowledge and therefore enabled discourse to take material forms through documents and statements. Discursive practices, therefore, are not just linguistic practices but also materialistic rendering the distinction discursive/non-discursive practice as irrelevant. Non-humans therefore are understood in this study not just as things with symbolic meaning but as the setting or 'material arrangement' within which the practice of anti-corruption takes place (Schatzki, 2005, p. 472).

By material arrangements, Schatzki (2002) suggests that social practices happen always within some sort of material setting. If teaching, for example, is a practice then desks, and chairs, and blackboard,

books, pencils, chalk are necessary. Likewise, anti-corruption as a practice takes place in different material settings. For instance, in the risk assessment process described in paper #1, a meeting room, a round table, PowerPoint slides, maps, documents, chairs, pencils, a projector or computers and tablets are definitely needed for the practice to be performed. Similarly, if the practice of anti-corruption takes place in an international conference then a bigger building is needed and in it a conference center with many rooms so people can convene and discuss using the materials mentioned above. Things and non-humans therefore 'localize' (Latour, 2005) the practice by offering a materialistic and in some cases even naturalistic setting.

Materials allowed me to locate the practice of anti-corruption in corporate or international settings but it would be a mistake to say that practices are ready-made meaningful objects to be simply recorded, captured, or even observed. They need to be re-constructed or interpreted (Bueger & Gadinger, 2014). According to Taylor (1979, p. 25), interpretation is a hermeneutical 'attempt to make clear, to make sense of an object of study', meaning that without the researcher's analysis a practice does not make sense or lacks a comprehensible meaning. It would also be a mistake, however, to say that meaning rests exclusively with the mind of the researcher or observer who will attach it to the practice of anti-corruption. Practice is therefore located between the observer and the observed, the objective and the subjective, without, however, being either of the two. As Rabinow and Sullivan (1979, p. 5) commented on Taylor's paper 'Interpretation and the Sciences of Man' (1979), 'The baseline realities for both the observer and the observed in the human sciences are practices, socially constituted actions'.

My study of anti-corruption is informed by the above theoretical concept of practice. I started my endeavor on anti-corruption with later conceptualizations of practices as they tend to be more refined and elaborated as well as more materialistic (Nicolini, 2012). However, as I was developing my thought and concepts I ended up using earlier theoretical perspectives on practices such as Foucauldian governmentality and Actor-network theory (Dean, 2010; Foucault, 1995; Latour, 2005). This happened mostly because on the one hand my focus on anti-corruption was becoming more anchored in broader understandings of power and politics, and on the other less anchored in various components of practices such as discourses, knowledge, rules, and norms. Indeed, my focus was not anymore on anti-corruption as an object to be used by actors to produce outcomes such as profits or

ethics, but as an effect produced by its own practice. In this process, I found it interesting and useful therefore to understand how anti-corruption becomes integrated in corporations (paper #1), then how anti-corruption is thought of (paper #2), and only when I had an overall understanding of corporate anti-corruption was I able to focus on the international practice of anti-corruption (paper #3). Below I discuss and elaborate on the key points of the practice approach namely practices as situated human activity, the rejection of dichotomies and dualities, relationality, and practical knowledge. I conclude this section by discussing the ontological choices and implications of this theoretical framework.

6.1 Practices as situated human activity

If one wants to study practices he or she needs to locate them in the lowest common denominator, socially constituted actions. Indeed, Feldman and Orlikowski (2011, p. 1241) argue that despite the differences between various strands of practice theory, scholars do seem to agree 'that situated actions are consequential in the production of social life'. Actions include both the 'sayings' and 'doings' of human beings in performing and participating in a practice (Schatzki, 2002). Doings refer to the everyday actions human beings do in performing their daily tasks, duties, and activities. Sayings belong to the category of 'doings' since 'to say' something requires the use of the mouth and tongue. However, 'sayings' should not be restricted to language since an action made with the use of the hand, for instance, may 'say' as much as a word spoken. When the practice of anti-corruption is performed, people use their body in certain ways such as when compliance officers open their mouths to talk and explain regulations, or when they move their hands to use the computer or point to the slide presentation, or even when they walk to move from one meeting to another. Therefore, within a practice theoretical framework and as it will also be further discussed below, it makes no sense to distinguish between discursive and non-discursive action (Bacchi & Bonham, 2014; Schatzki, 2002).

Both bodily doings and sayings do not mean much as random actions. They need to be *situated* or to be performed within a certain and specific context. A situated practice means that it happens 'within specifiable historic, discursive, and material situations' (Nicolini & Monteiro, 2016, p. 15). Historically then, this study on the practice of anti-corruption belongs to the era of globalization; an era in which social, political, and economic conditions have been transformed due to the interconnectedness enabled by the rapid technological development which humanity has experienced during the late 20th and early 21st centuries (Held, McGrew, Goldblatt, & Perraton, 1999). For the

purpose of this dissertation, it is of interest that Western multinational companies were over the same period of time able to expand at an unprecedented pace and range challenging the very foundations and boundaries of the institution of the nation-state as this was established in the Westphalian Treaty of 1648 (Cutler, 2001). According to the Organization for Economic Co-operation and Development (OECD) (2018), by 2017 multinational companies accounted for half of global exports, almost one-third of the world's GDP and about one fourth of global employment. In this capacity, multinational companies were characterized as agents of change (Sell, 1999), as well as breeders of, and at the same time potential allies in the fight against, corruption (Calderón et al., 2009; Wrage & Wrage, 2005).

This context characterizes also the discursive conditions within which corporations have been operating more or less known as global governance. Global governance theory maintains that authority has been reoriented towards multiple directions one of which is the private sector and multinational companies in particular (Rosenau & Czempiel, 1992). This shift in mentality regarding the role of multinational companies was analyzed by scholars as an indication of private authority (Hall & Biersteker, 2002), business power (May, 2006), corporate responsibility and citizenship (Crane et al., 2008; Scherer & Palazzo, 2011), or just neoliberalism (Shaw, 2000). In all cases multinational companies have been subject to a growing expectation and sometimes ambition to complement or supplement governments in their role to provide for public goods and social growth (Bernhagen & Mitchell, 2010). This meant that along with their geographical and quantitative expansion, multinational companies witnessed also a qualitative extension of their responsibilities to integrate environmental and social objectives into their operation and strategic orientation.

Materially, this study is situated in discourses understood as material 'statements' or monuments built or used by human beings. As I will show below (sub-chapter 6.5), at the core of this argument is an interpretation of discourse and therefore discursive practices as more than strict spoken language. In contrast with inter-subjectivism in which discourse plays the most important role since it assigns meaning to signs (Neumann, 2002), in practices, language has meaning as long as it intervenes and acts on the world along with the other elements of practice (Nicolini, 2012). Statements are material because they do not contain meaning themselves but offer a map of the 'rules and transformations' that made a practice possible and meaningful at a certain time and place (Foucault, 1995). In effect

this means that the material world within which compliance officers operate offers the rules making anti-corruption a meaningful practice.[5]

6.2 Rejecting dualities and dichotomies

The above is a fine example of another common characteristic of practice theory; the rejection of dualities and dichotomies such as agency and structure, micro and macro, economy and society, interests and norms, subjective and objective (Feldman & Orlikowski, 2011). Actor-network theory for instance has been developed on the proposition that there is no 'macro' level but only actors and networks. The 'macro' level, according to Callon and Latour (2014) is no more than a social construction which has been considered as given or as a 'black box'. ANT's objective is to not only open these black boxes and observe them, but also to provide for a 'toolbox' with which scholars can deconstruct them by following the traces left by the translations and negotiations performed by actors during its construction (Latour, 2005). In so doing, ANT, offers a 'flat' ontology in which the 'social' does not consist of analytical levels but is rather a flattened network of local sites mediated by actors or 'actants' in ANT terminology. Likewise, Schatzki (2002) has also offered his own flattened view of social reality. In his account, 'the site of the social' is composed of nexuses of practices and material arrangements' (Schatzki, 2005, p. 471). Quite close to ANT's understanding of social reality, Schatzki (2005), as mentioned above, differentiates his 'site ontology' on the role of materials. In contrast with ANT and closer to this thesis' ontological assumptions, Schatzki (2002) maintains that while practices are strictly the outcome of human action, the social orders created by practices are arrangements of people, artifacts, organisms, and things through which social life aspires. Ontological considerations will be further discussed later in this chapter.

Practice theory rejects the interest-norm dichotomy; social action and order are neither the outcome of individual interests nor the outcome of structural forces. To put this statement into perspective, and as we have seen in the literature review, anti-corruption has been analyzed mostly either as the outcome of norms and rules or the outcome of individualistic interests. Likewise, we have seen that the application of anti-corruption within corporations can be expected as ethical normative pressure or imposed compliance. However, as my fieldwork and analysis was developing I came across what Bourdieu (1977, p. 8) called 'necessary improvisation'. This means that not only did no rules of any

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[5] See pp. 44-51 for elaborated discussion on the matter of materiality of discourse and relevant examples.

kind determine the actions of my research subjects, but also that these rules were being used as means for interpretation of certain situations. For instance, the diffusion of risk-based analysis of anti-corruption promoted by the UK Bribery Act and other similar governmental and private regulations was not just a guideline on how to behave, but most importantly the means upon which compliance officers started building their anti-corruption strategy by translating anti-corruption into business practices (paper #1) and therefore form the identity of a trusted business advisor (paper #2). A practice-oriented approach therefore offered a 'way out' from the interest/norm dichotomy and allowed for a more nuanced way to conceptualize anti-corruption as enacted and reproduced through human action.

Practice theory rejects the dualities between interests and norms, micro and macro, but only in so far these appear as dichotomies. That is to say, interests and norms can coexist but within practice and not as antithetical and opposing forces. Giddens' (1986), theory of structuration, for example, is an attempt to transcend the duality and dichotomy between agency and structure as a mere representation produced and used for the sake of analytical convenience. Similarly, Bourdieu's (2000, p. 138) concept of *habitus* aims at superseding the subjective-objective dichotomy:

> 'One of the major functions of the notion of *habitus* is to dispel two complementary fallacies each of which originates from the scholastic vision: on the one hand, mechanism, which holds that action is the mechanical effect of the constraint of external causes; and, on the other, finalism, which, with rational action theory, holds that the agent acts freely, consciously, and, as some of the utilitarians say, 'with full understanding', the action being the product of a calculation of chances and profits.'

6.3 The principle of relationality

Instead of opposition between concepts, practice theorists insist on the relationality of phenomena and their constitution. Relationality here means that phenomena are not constituted by their members or other phenomena, but rather by the relationships between these members and phenomena (Bradbury & Bergmann Lichtenstein, 2000). That is to say, that the object of inquiry shifts from the entities of a phenomenon to their relationships and how these relationships establish practices or networks (Latour, 2005). I encountered this principle of practices while I was doing my fieldwork and in particular interviews and discussions with anti-corruption experts. I asked a compliance officer

once whether there was a conflict of interest between anti-corruption and profit. He answered that it would be a mistake to think of it in this way. Anti-corruption does not prevent profits but rather delimits the boundaries within which profit should be gained. Moreover, he continued to argue that if you see anti-corruption as value maker then it may even create a financial surplus. This off-the-record comment was the spark that allowed me to start thinking about norms and interests in a relational relationship instead of an opposing and antithetical one.

The principle of relationality is evident in practice theory by the components each theorist argues for as constitutive of practice. Schatzki (1996) argues for practical understandings, teleoaffective structures (unwritten rules), written rules, and general understandings as the *links* between the sayings and doings of humans. Similarly, Bourdieu (1990) argued for the relations between habitus, fields, and capital. ANT's translations and mediators are the vehicles connecting sites and centers of calculation (Latour, 2005), and likewise Foucault (1991) wrote about governmentality to emphasize the relationality between government and rationality. Government, according to Foucault, has to do with the regulation of human action (Burchell, Gordon, & Miller, 1991). To govern is to shape and guide the action of people to the extent that people, including the governor, are considered as self-governed. Rationality is a form of thinking about how government should function. It requires the employment of techniques and technologies, rules, administration, measurements and classifications, among other things, all of which make visible and manageable those to be governed. It follows then that understanding practices and how they bring social (dis)order and action requires a relational understanding of the elements involved and composing a specific practice.

6.4 Practical knowledge

Finally, knowledge, to perform a practice 'embraces ways of understanding, knowing how, ways of wanting and of feeling that are linked to each other within a practice' (Reckwitz, 2002b). Such knowledge is usually referred to as 'background knowledge' (Bogner et al., 2009a), practical understandings (Schatzki, 1996), '*habitus*' (Bourdieu, 1990), practical consciousness (Giddens, 1986), tacit knowledge (Collins, 2001), discourse (Foucault, 1995), etc. Schatzki (2002, p. 78) argues that practical understandings is what makes bodily and mental activities hang together in practice. Practical understandings mean that a human being has the knowledge of not only how to make specific bodily activities but also how to identify similar moves, and how to respond and prompt to

such bodily moves performed by others. For Bourdieu (1990), *habitus*, the dispositions that produce activities and shape but also are being shaped by the social field, is the type of knowledge which always determines and organizes practice and action. In the same vein, Giddens (1986) maintains that his concept of practical consciousness determines both practices and their constitutive actions.

According to Collins (2001), practical understanding or tacit knowledge is the kind of knowledge that we all understand when we see it or better acquire it, but rarely if ever we can express it in a codified way so that others can replicate it. Even if the best practitioner shared what he knows, we cannot be certain that we would be able to do the same thing with the exact same results and method. Knowledge is dynamic and it changes and evolves with each actor acquiring it within the practice's specific context. That is to say, it is produced based on the social context within which the practice is performed and it has a meaning only in that particular context and performer. Tacit knowledge is not about doing things in a right or wrong way; this should be a matter of experience after all. Rather, tacit knowledge is just about doing or performing a practice in a particular time and place.

6.5 Further ontological considerations: the materiality of discourse and discursive practices
The decisions regarding the theoretical framework did not come without challenges. From a practical perspective, the above ontological positions allowed the synthesis of the three papers into the present thesis. Likewise, and in terms of their theoretical foundations, the three papers are based on the overlapping aspects of approaches concerned with the study of practices. However, the same approaches differ conceptually in ontological terms regarding the role of the material world in the constitution of social phenomena (Table 4); Foucault and his followers studying governmentality draw on discourses and 'what is said' to uncover deep-seated assumptions (Bacchi, 2012; Bacchi & Bonham, 2014; Dean, 2010; Rose & Miller, 2010b). Latour's (2005) ANT argues for a view of the 'social' as socio-material networks and therefore of importance are the connections or translations enabling its construction. International practices (Adler & Pouliot, 2011b; Bueger & Gadinger, 2014) build on the works of Bourdieu and other more recent practice theorists arguing for practices as the 'smallest unit' of analysis to study international phenomena. The issue therefore was how discourses, practices, and networks can ontologically be compatible with each other without reducing their conceptual and analytical value as such. Schatzki's (2005, 2011) argument and understanding of non-humans as necessary and constitutive of practices but agential only as entities composing social orders

along with people brought ANT and International Practices closer as these theories clearly argue for practices as socio-material instances. In contrast, Foucault's concept of discourse needed further interpretation in this regard since more often than not discourse is identified with language.

According to Reckwitz (2002b), practice theories are cultural theories but not all cultural theories are practice theories. Practice theories are cultural because they conceptualize human action as the outcome neither of interests (*homo economicus*) nor norms (*homo sociologicus*). Rather, cultural theories source human action and social order in 'the symbolic structures of knowledge which enable and constrain the agents to interpret the world according to certain forms, and to behave in corresponding ways' (Reckwitz, 2002b, pp. 245–246).

	Actor-network Theory	International Practices	Governmentality
Location of the 'social'	Socio-material networks	Socio-material practices	Discursive practices
Role of material in constitution of practices	Constitutive (agential)	Constitutive (not agential)	Constitutive (needs interpretation)

Table 4: Materiality in the constitution of practices

In addition, he argues that practice theories differ from other cultural theories in that they conceptualize the smallest unit of analysis, or else the 'site of the social' (Schatzki, 2002), in practices. In contrast, other cultural theories such as mentalism, textualism, and intersubjectivism conceptualize the social in the minds, discourses, and interactions of humans respectively.

In Reckwitz's (2002b) respect then, Foucault's (1995), discursive practices do not fit into practice theories since they are a distinct kind of practices in which the smallest unit of analysis is discourse,strictly understood as language, and not practice. As this chapter is unfolded, I will show that this is not the case; according to recent interpretations of Foucault's concept of discursive practices (Bacchi & Bonham, 2014), discourse, understood as knowledge, is about language as much it is about material practices rendering the discursive/non-discursive dichotomy irrelevant. Discursive practices are not a different kind of practices but rather the site in which knowledge, rules, and materials co-habit and reproduce themselves. In so doing, discourse is ontologically compatible with

practice theories and also contributes to the conceptualization of practices themselves by uncovering the implicit and deep-seated knowledge guiding the governance of anti-corruption.

Foucault's work has been associated and developed during the 'linguistic turn' in social sciences (Rorty, 1967; Van Maanen, 1995), a movement which claimed language and 'what people say' as a meaning inscribing device. According to this philosophical turn in social sciences, discourse does not have a strictly descriptive of 'what is true' function; rather it is used both to inscribe meaning to the world and also to read back this meaning (Carver, 2002). Discourse then is constitutive of the social world since it gives meaning to it. In this sense, the site of the social is not out there waiting to be found, but rather is constructed and co-constructed through the discourse used by human beings (Hook, 2001). It is people through their spoken, written, or even conceptual language who attach meaning to certain objects, phenomena, relationships, understandings, events, and so on. But discourse also constitutes the social world since it allows people to 'receive' back meanings as they have always been there. Risk, for instance, is a concept which has been constructed through discursive practices (Hardy & Maguire, 2016; Maguire & Hardy, 2013; Slager, 2017), and at the same time is received back as differently as a danger (Beck, 1992), uncertainty to be organized and managed (Hansen, 2011; Power, 2007), treatment (Hansen, 2011), and opportunity (Andersen et al., 2014).

Foucault did in some cases use the terms 'discourse' and 'discursive practices' in the same way humans use language to inscribe meaning in and out of the world. In his own words, '*what they say*, that little fragment of discourse - speech or writing, it matters little' (Foucault, 1991a, p. 71, emphasis in the original). However, several scholars argue that Foucault's concept of discourse means knowledge (Bacchi & Bonham, 2014; Cousins & Hussain, 1984; Hook, 2001). According to this line of interpretation, Foucault's use of discourse as knowledge points to two distinct but interrelated meanings; discourse as '*what is within the true*' (1995), and discursive practices as *a set of practices which contain the rules shaping* (1995) what is to be taken as true or knowledge. This distinction derives from Foucault's definition of discourse as the difference between 'what is said' as opposed to 'what can be said':

'discourse is constituted by the difference between what one could say correctly at one period (under the rules of grammar and logic) and what is actually said' (Foucault, 1991a, p. 63).

By 'what is said', Foucault (1991a), detaches discourse from a strict linguistic understanding since he distinguishes it from language in good grammatical order and logical thinking (Cousins & Hussain, 1984). Therefore, for discourse to count as knowledge, neither (simply) a formulation of words in grammatically correct order, nor the outcome of a person's thought suffices. A well-articulated and thought statement can as well be proven not to be 'true'. Indeed, as Bacchi and Bonham (2014) note, Foucault's focus was on '*what* people say' and not on 'what *people say*'. This is justified by Foucault's interest in studying not the sovereignty of the subject, which does not exist, but the mechanisms through which an object is subjectified. Plenty are the cases from our personal experience in which we consider other people's sayings as irrelevant to a particular discussion or when we dismiss them as simply not 'true'. Likewise, there are cases where we conclude that someone's words are logical but are the outcome of thinking under either stress or anger and therefore not valid for a certain situation. Discourse thus cannot be simply what is thought and comes out of people's mouths. If '*what* is said' is the outcome neither of grammatical rules nor logical thought, then there must be some mechanisms refining all the things that 'can be said' until only a small bit, the 'true', remains (Foucault, 1991a, 1995). In this sense, a discursive practice is not about how people use discourse but rather how the practice of discourse regulates what is to be said. Indeed, for Foucault (1995, p. 117) discursive practices are:

> 'a body of anonymous, historical rules, always determined in the time and space that have defined a given period, and for a given social, economic, geographical, or linguistic area, the conditions of operation of the enunciative function.'

Foucault and his students have conceptualized in different ways the nature and form of such mechanisms, as rules of formation (Foucault, 1995), problematizations (Bacchi, 2009, 2012), government analytics (Dean, 2010), rationalities and technologies (Rose & Miller, 2010), or even simply as discourses (McHoul & Wendy, 1993). Dean (2010) for instance, in his government analytics, writes about thoughts, technical means, visibility, and identities as the integral 'discourses' of 'regimes of practices'. Therefore, the study of discursive practices can also be thought of as a study of practices of discourse (Bacchi & Bonham, 2014) in the sense that discourses (*what* is said) mean not only knowledge of the kind 'what is true', but also the mechanisms regulating what is to be counted as such (Cousins & Hussain, 1984):

'If I have studied 'practices'…it was in order to study this interplay between a 'code' which rules ways of doing things (how people are to be graded and examined, things and signs classified, individuals trained, etc.) and a production of true discourses which serve to found, justify and provide reasons and principles for these ways of doing things.' (Foucault, 1991b, p. 79)

Most importantly, these mechanisms and rules are not external to the discourse they regulate but inherent to its own practice. Just like subjects are not sovereign and therefore their interests alone cannot shape their actions, the rules by which discourse is regulated cannot come from anywhere else but the practice itself (B. Brown & Cousins, 1980). This is why, according to Bacchi and Bonham, (2014)2014, Foucault (1991a, p. 71) insisted that discourses need to be studied as 'a complex and differentiated *practice* subject to analyzable rules and transformations' (emphasis added).

To complete this position, Bacchi and Bonham (2014) argue furthermore that the distinction made between discursive and non-discursive or material practices is not a valid one. They do so by highlighting Foucault's (1995) concept of 'statements' as material 'monuments' or events', artefacts build by humans, and which require 'archaeology' if they are to be 'unearthed' and studied. Statements, like discourse, are not meant to be understood and handled as 'speech acts' because a statement is more than language (Cousins & Hussain, 1984). Rather, statements are material at their core; they do not contain meaning themselves but offer a map of the 'rules and transformations' that made a practice possible and meaningful in a certain time and place:

'The statement is always given through some material medium, even if that medium is concealed, even if it is doomed to vanish as soon as it appears.' (Foucault, 1995, p. 112)

The materiality of statements is conditioned by the practice itself (Young, 2001). Take as an example anti-corruption legislation and in particular the UK Bribery Act as one of the landmarks of the anti-corruption regime. The UK Bribery Act and its accompanying guidelines can be seen as an example of a 'statement' made by the UK Government. Once introduced, the UK Bribery Act turned from words carefully arranged to an event or fact; it has been used by national and international public and private actors in the practice of anti-corruption to educate, guide, prosecute, inspire, and enforce certain behaviors and practices. The UK Bribery Act then acts as a function of the 'institutional

apparatus' of global anti-corruption and one can possibly think that it cannot exist outside this framework regardless of whether it was written, typed, or even said or remembered. A study on a statement then is not about where it is stored or how it was produced, but about how it has come to be as a material artefact securing 'the status of "discourses" as knowledge' (Bacchi & Bonham, 2014, p. 184; Foucault, 1995). By securing, it is meant that statements play a central and organizing role in 'activating' other statements and *their routines of relations* (Bacchi & Bonham, 2014). To return to the above example, The UK Bribery Act activates other statements such as announcements, codes of conduct, Deferred Prosecution Agreements, categorizations of employees, risk assessments, corruption indexes, and training courses. It follows then than what can be called anti-corruption discourse is made up of such materialistic statements (Young, 2001) and hence their study requires an 'archaeological' inquiry; one that will focus not on these statements as materialistic facts, signs, events, or objects but on the relations between them (Foucault, 1995).

The triangle of discourse as knowledge, practice, and materialistic statements causes Reckwitz's (2002a) argument that Foucauldian approaches are not ontologically practice-based to collapse. By 'discourse', Foucault meant not the language representing reality but the practice within which knowledge, rules, and materials co-habit and reproduce themselves, including language. In this sense, it is possible to think that discourse understood as language has neither priority over other elements or components of practice nor is it a special kind of practice; rather, discourse is meaningful only within a certain practice along with the rest of its components.

6.6 A flattened ontology

The ontological outcome from such an understanding and interpretation of practices is a flattened one. Flattened for two reasons; first, because as I showed above it makes no sense to distinguish between discursive and non-discursive practices and thus social reality is socio-material regardless of whether it is the human body or text we are interested in; and second, because it consists of associations (Latour, 2005) or arrangements (Schatzki, 2011) between human and non-human elements. As Schatzki (2005, p. 471) argues in his ontology, 'the site of the social is composed of nexuses of practices and *material arrangements*' (emphasis added). By material arrangements, he means the materialistic, biological or not, setup in which practices and these arrangements occur as a *mesh*. As he (2015, p. 14) explains:

> 'Flatness is a paramount feature of social existence: all social phenomena are slices and features of the one plenum of linked practices and arrangements.'

Schatzki thus considers the material world as necessary constituent of social reality. In so doing, the examination of the practice of anti-corruption 'between' perceived levels of analysis is enabled since social reality ceases to be understood as layered between micro level inhibited by individuals and their actions and the macro level inhibited by organizations and institutions and the systemic pressure these exert on individuals. In contrast, the social consists of a nexus of socio-material networks and practices regardless of how 'big' and 'social' an institution or organization is considered to be. What is usually understood as global is no more than an abstraction, a socially constructed reality which by definition hangs *above* all actors as a separate level giving the impression that it is '*larger*' than the local (Latour, 2005). What is more, the construction of the social is not about striking a balance of the interaction between the extremes of micro and macro or lower and higher levels (Bourdieu, 1990; Giddens, 1986), but to insist on staying only on one of the two (Latour, 2005). Regardless of the choice, it will soon be realized that what has been considered as 'global', 'macro', or 'systemic' is no more than any *local* site in which individuals act (Schatzki, 2015). Place, size, and scale are therefore constructed. Indeed, as Latour (2005, p. 179) argues:

> 'An organization is certainly not 'bigger' than those it organizes. Since Bill Gates is not physically larger than all his Microsoft employees, Microsoft itself, as a corporate body, cannot be a vast building in which individual agents reside. Instead, there is a certain type of movement going through all of them, a few of which begin and end in Mr Gates's office. It's because an organization is even less a society than the body politic that it's made only of movements, which are woven by the constant circulation of documents, stories, accounts, goods, and passions. For an office to be traversed by longer, faster, and more intense connections is not the same thing as being wider.'

The use of a flat ontology means that power is not understood in this dissertation as a capacity to control others in a vertical top-down relationship between higher and lower level actors. Nor does it mean that those considered as 'higher' level-wise are by definition more powerful than those who are lower level actors. Yet, this is not to say that all actors are the same or equal; some are more active than others depending on the associations they form between them. Power is thus considered as an

effect of a network of heterogeneous relations where ultimately no one really has control of this network of power relations (Foucault, 1982). Drawing on this conception of power, Latour (1986) argues that powerful actors are those who are in a position in the network of relations which allows them to shape the actions of others.

To put the above use of power into this dissertation's empirical perspective, a compliance department is not 'global' by virtue of its positioning within the administration or the company's headquarters drawing authority from its 'higher' position in the corporate organogram. After all, the same applies for the CEO's secretary. What makes compliance 'powerful' then is the very fact that it is directly connected with each and every department and aspect of the corporation. All employees and managers have access to and are expected to contact the compliance department should they find themselves in a situation concerning corruption. The department is placed thus in a position which allows them to control the actions of their colleagues by integrating anti-corruption principles into the default operation of their company. Indeed, as this study shows, anti-corruption is not simply exercised, diffused, or imposed but rather negotiated between the organization, its members, and the compliance function operated by compliance officers.

There is no shortage of criticism of practice approaches and their use of the concept of power. Lukes (2005), for example, in his impressive analysis of the faces of power argues that the Foucauldian notion of power is ultra-radical to the extent that it makes no sense for scholars to use it since it reduces actors to mere dominated subjects. Likewise, organization and management scholars (Whittle & Spicer, 2008) have criticized Actor-network theory's performative understanding of power and politics which derives from its naturalizing ontology and un-reflexive epistemology. Other scholars have noted a tendency for practice theories to not engage with power explicitly as a separate property (Barnes, 2001; Watson, 2017). As the same scholars argue, however, and I side with them for the purpose of this dissertation, 'To engage in a practice is to exercise a power' (Barnes, 2001, p. 28). This is because power is inevitably exercised as human action but not necessarily individually as one's actor capacity but rather collectively. In the case of anti-corruption, one needs to think only how many factors have been invoked as necessary for establishing a culture of compliance; compliance officers, ethical leadership, regular training, whistleblowing, fair wages, due-diligence,

communication, codes of conduct, punishment and reward mechanisms etc. Similarly to practice then, the exercise of power is a collective action (Barnes, 2001).

7. Methodology

7.1 A praxiography inspired methodology

I adopted an interpretive method inspired by 'praxiography' to conduct my fieldwork (Bogner et al., 2009a; Bueger, 2014; Flick, 2009; Kvale, 1996; Schwartz-Shea & Yanow, 2012b; Yanow & Schwartz-Shea, 2007). An interpretive methodology treats data not as given, or waiting out there to be found and therefore collected or 'dug out' (Kvale, 1996), but rather as things to be 'accessed', 'observed and made sense of, interpreted' (Yanow & Schwartz-Shea, 2007, p. xix). In other words, an interpretive methodology requires *access* to sources that might allow for *data generation*. Detailed accounts of the methodology and methods employed can be found in the dissertation's attached papers. For the purpose of this thesis I will provide an overview of the methodology and methods employed starting with how and what sort of access I sought and was granted and how I generated my data.

I was convinced that in order to understand anti-corruption an in-depth study was required. This conviction was the result of a pilot study I did by studying several Codes of Conduct publicly available on corporate websites. When one takes the time to read these codes of conduct and CSR reports notices how similar they are, but at the same time what attracted my attention was descriptive statements such as 'we don't tolerate corruption', 'this year we had x number more whistleblower cases', or 'we have trained 90% of our personnel in x number of countries'. What do these statements mean for anti-corruption? Is that anti-corruption? Is anti-corruption a matter of training or whistleblowing and if so how? Is this how companies practice anti-corruption? Who is responsible for anti-corruption? Who does anti-corruption? Is anti-corruption limited to reporting? An obvious way to deal with such complex questions and relations was to perform an in-depth study or as it is usually called a 'case study' (George & Bennett, 2005) where the researcher selects a specific institution, field, or individual in order to study and answer complex relationships (Flick, 2009) which may or may not lead to a certain outcome as a positivist approach would expect (King, Keohane, & Verba, 1994).

This was a short-lived plan for two reasons; first, by selecting an institution, individual, or field I was also taking ontological decisions I was not comfortable with. As mentioned in the previous section , I chose a flat ontology in which individuals, institutions, and fields are meaningful only in relation with one another and are not to be treated separately. On top of that, such an ontology insists that actors, no matter their attributed 'size' or level, consist of the same elements and therefore they can be subject to the same analytical approach (Schatzki, 2011). Furthermore, as I am interested in '*what is said*' and thus leaving aside the subject who said something, I am likewise interested in '*what happens*' and not where and by whom something happened. This interest in the 'what' is an interest in the practice of anti-corruption which renders the choice of a level-wise analytical focus irrelevant. Second, not all topics and areas of interest are fully accessible and open to in-depth investigation (Bueger, 2014), anti-corruption in the private sector being one of them. Indeed, when I approached a couple of major Danish MNCs and formally proposed to be granted access to their anti-corruption and compliance departments, they refused for reasons of sensitivity and unnecessary risk.

I found the remedy for these issues in using a praxiographic methodology (Bueger, 2014; Nicolini & Monteiro, 2016; Pouliot, 2013). Praxiography utilizes the methods usually employed in qualitative and interpretive methodologies such as expert interviews, participant observation, and document analysis, but differs in that it focuses on the reconstruction of practices instead of the reconstruction, for example, of cultures as in the case of ethnography. In this sense, praxiography remains interpretive since the objective is the reconstruction of practical knowledge through the observation of human bodily movements, discourses, texts, or artefacts of various forms necessary for understanding the tacit or background knowledge inherent in practices (Bueger, 2014). Moreover, it is suggested that praxiography should remain flexible with regards to the choice of methods since methodological 'orthodoxy' may hinder practice, which is after all a practice in itself and is therefore subject to improvement through training and experience (Bourdieu, Chamboredon, & Passeron, 1991; Bueger, 2014; Pouliot, 2013).

Using praxiography allowed me to study and reconstruct anti-corruption as a practice, or its components thereof. Although the study remained largely a study of the sayings and doings of people (Schatzki, 1996), its 'telos' became the practice of anti-corruption and not the subjects performing these sayings and doings. That is to say, what was in need of interpretation was neither what people

say, nor what they do or believe per se. Rather by examining how anti-corruption is practiced, I was looking for the *deep-seated conceptions that made anti-corruption possible, the notions that made it acceptable, the actions that constitute it, and the organization of its components including humans and non-humans as expressed in discourses.* None of these components or aspects of the practice of anti-corruption exist in vacuum although it may seem so when examined separately. In paper #2, for instance, my objective has been to reconstruct the practice of anti-corruption as governmentality by highlighting how visibility, self-responsibility, and a business mindset found in the discourses of compliance officers shapes the governance of anti-corruption in companies. In paper #1, the focus is again on anti-corruption as practice but this time I highlight how such a function is constructed through translations and negotiations between corporate actors. The detachment from analytical constructions such as individual, institution, and field offered a solution also to the issue of getting permission to access such constructions. It became possible to study anti-corruption not by getting access to a particular institution or by 'shadowing' (Czarniawska, 2007) an individual, but by 'accessing' in any way it was feasible to do so sources where raw information on the practice of anti-corruption was available.

Freeing methodology from rigid analytical structures, however, did not mean that the selection of those sites or sources of primary data was an easy task. Having no clue how to go about this, I relied on textbook suggestions on following the practice of anti-corruption as 'the doings' and 'sayings' of anti-corruption experts. But who is an expert? According to some scholars, in academic research, who is an expert is to some extent decided by the researcher herself who assumes that a person holds special knowledge, or has expertise in the topic of interest (Meuser & Nagel, 2009). But as these scholars also point out, these assumptions made by the researcher may well be mistaken or biased. Indeed, my initial choice to approach CSR managers to discuss anti-corruption proved a misinformed one since they directed me to their colleagues in the *business ethics* departments responsible for anti-corruption. There, I found compliance officers dedicated to the design and implementation of the anti-corruption policy of a company. Most of these officers and even managers were not educated in anti-corruption compliance let alone legal studies. They were placed there when such a need appeared, and they reacted differently depending on their background and own experiences. Most importantly, I concluded that despite the wealth of rules one finds in compliance and anti-corruption, in effect, things get their own trajectory once in motion, evident of the fact that practices are in

constant movement and ever-changing just like the world itself (Nicolini, 2012). I managed to get insights on what, when, why, and how anti-corruption is practiced or has been practiced in corporations. Depending on the interviewee, I gained access to descriptions and narratives on what further practices and actions are performed during the practice of anti-corruption, what challenges they face, what successes they had, failures, details on the means by which they do their job such as manual or automated checks. Moreover, they described their relationships with other departments in the company, their position in the hierarchy, their differences with the CSR department as well as information on how they themselves feel about corruption and ethics in general.

Delimiting anti-corruption knowledge to corporate professionals was on the one hand an excellent point of departure, but on the other hand insufficient. Insufficient because as Gibbons and his colleagues argue (2010), since the 1960s, knowledge production has entered 'mode 2' following the traditional 'mode 1'. In the latter, knowledge is generated autonomously within 'a disciplinary, primarily cognitive, context' (Gibbons et al., p. 1). That is to say, what defines knowledge is the normative environment of each discipline and accordingly an expert and the knowledge he or she holds are validated by its compliance to certain rules. The expert was only the one who was certified as such by virtue of his or her membership to a certain professional trade union or association. Historically, according to Gibbons et al., this has been an effort to control the expansion of scientific enquiries to fields of interest other than those which could adequately studied in the same manner as nature. In this sense, knowledge is understood as a product and therefore it can be monopolized by certain and exclusive social groups and authorities. In contrast, mode 2 of knowledge production is an outcome of modernity and the way societies have changed due to globalization. The gradual realization of the consequences of the industrial society as global problems, required solutions which undoubtedly required in turn interdisciplinary solutions (Gibbons et al., 2010). In mode 2, knowledge production is plural; what is legitimate, or what is to be considered as valid expert knowledge is not defined by autonomous rules and norms but by the broader communities with which a problem is concerned. Knowledge is produced not only in professional contexts but understood as a mixture of scientific expertise, public acceptance, other professional networks, political and economic interests (Meuser & Nagel, 2009).

Data sources		Data use
Interviews	30 anti-corruption experts in Denmark and China	Reconstruct anti-corruption as a practice based on practices, discourses, written and unwritten rules, feelings, knowledge, material and non-human elements, networks, thoughts, action, know-how.
Participation observation	• ISO/TC Plenary- Anti-Bribery Management International Best Practices Symposium • Seminar on anti-corruption and compliance with at the China National Institute of Standards • TRACE E-learning session on gifts and hospitality • United Nations Anti-corruption E-Learning Tool • Compliance and Anti-corruption Certification course	
Documents	(Public) • Corporate codes of conduct, CSR/Sustainability reports, Policy documents, Legislation (Private) • PowerPoint slides, guidelines, internal documents shared in private sessions	

Table 5: Data sources and use of data in reconstructing the practice of anti-corruption

The two modes of knowledge production are not opposite forces but supplementary to each other (Gibbons, 1994), and likewise the definition of who is an expert expands. An expert is not only the one who is considered as such by the researcher, but also the one who is accepted as such by his or her broader community, and 'possesses the authority to construct reality' (Hitzler, Honer, & Maeder, 1994 cited in Meuser & Nagel, 2009). In this sense, expertise, expert knowledge, and subsequently the expert resemble to Foucault's notion of power as the force shaping other actor's actions (Bogner & Menz, 2009; Foucault, 1982). This is the reason why accessing only one of the two modes of expert knowledge was insufficient if I was to understand the practice of anti-corruption which has become an industry (Sampson, 2010) composed of not just corporations but also consultancies, law firms,

NGOs, governmental agencies, collective private and non-public organizations, all of them offering expertise in this area of activity. Naturally, my fieldwork had to extend to these areas as well.

As a result, I expanded my fieldwork to further sources of data and the first round of interviews and meetings with anti-corruption and compliance officers paved the way for that quite well. Through a process of 'snowballing' I was able to locate and interview anti-corruption experts outside corporations such as lawyers, public servants, consultants, lobbyists, and NGO employees. Moreover, I attended events as an observer and participant depending on the situation, and from there I collected documents from a variety of sources on how anti-corruption should best be practiced (Table 5).

7.2 Methods

7.2.1 Interviews

To compensate for the limited participant observation opportunities available (see below), I focused more on expert interviews with anti-corruption and compliance experts (Table 6). The extent to which fieldwork will consist of interviews, observations, or document-intensive methods remains with the researcher, and the peculiarities of each case (Pouliot, 2013). In my case, things were quite clear since there was no access to a compliance or anti-corruption department of an organization; I had to rely mostly on interviews and work my way through anti-corruption practice step by step. My plan was to get an outline of anti-corruption through the opportunities available at the time for participant observation and documents, and then to complement these by employing other and more available sources of data such as interviews with experts. Scholars have come up with techniques which help in understanding the practical knowledge of a practice if not capturing the practice itself (Bueger & Gadinger, 2015). Lueger and Froschauer (2009) for example argue that experts possess organizational experience and know-how that can be used in reconstructing practical expertise.

My interviews were designed and intended to be qualitative, descriptive, and focused. Qualitative because my focus was on the lived experience of the interviewees as compliance officers (Brinkmann & Kvale, 2008). Descriptive because gradually I learned how to encourage the interviewee to deepen his or her descriptions regarding their experiences, actions, and thoughts. Focused, because the themes I wanted to discuss with the interviewees were specific and guided the whole interview. What is their role in the company and what do they think about anti-corruption? Is it an ethical or a business issue and why? What is the difference between ethics and compliance? What do they mean when they

say compliance and ethics? How do they practice it and what means and resources do they utilize in doing so? The more I could get them to talk about their own perspective on these topics the better for my work. Some of the information I presented above regarding the development of anti-corruption in Denmark is indeed part of these interviews.

Date	Location	Professional Title	Assigned Interview No.	Duration	Data collected
Winter 2016/17	DK	Consultant	A16	60 min	✓ Global anti-corruption discourse ✓ Regulatory framework and the socio-political role of corporations. ✓ Role of compliance and compliance officers in a company. ✓ Detailed accounts of anti-corruption practices. ✓ Personal experiences and opinions. ✓ Professional life routines. ✓ Successes and failures.
		Consultant	A18	32 min	
		Head of Global Compliance	A8	62 min	
		Legal Advisor/Consultant	A14	50 min	
		Director, Group Compliance	A11	55 min	
		Compliance Officer	A30	50 min	
		Senior Compliance Director	A29	55 min	
		Global Compliance Officer	A9	30 min	
Spring/ Summer 2017		Consultant	A7	54 min	
		Senior Compliance Officer	A2	44 min	
		Director, Group Compliance	A13	55 min	
		Consultant	A15	60 min	
		Director, Group Ethics	A10	45 min	
		Consultant	A6	67 min	
		Compliance Officer	A3	52 min	
		Compliance Officer	A4	66 min	
		Compliance Counsel	A1	61 min	
Autumn 2017		Chief Compliance Officer	A5	48 min	
		Compliance Officer	A20	56 min	
	CN	Legal Advisor/Consultant	A21	52 min	
		Consultant	A12	81 min	
		Legal Advisor/Consultant	A19	30 min	
		Corporate Counsel	A23	70 min	
		Consultant	A17	55 min	
		Compliance Director	A22	86 min	
		Compliance Officer	A24	77 min	
Winter 2017/ 18		Corporate Senior Director	A25	72 min	
		Consultant	A26	53 min	
		Consultant	A28	53 min	
		Compliance Director	A27	54 min	
Total /Average min		30/57 min			

Table 6: Interview sources

However, there were cases, especially in the very first interviews, where I found myself overwhelmed by the amount of new information to the extent that it became difficult to follow my interviewees during the interview. The open and semi-structured character of the interviews as I had designed them (Kvale, 1996) was stuck in the imbalance between my inexperience, limited knowledge of the subject, and theory-laden terminology, and the interviewee's experience and pragmatic and practical vocabulary. It became obvious to me that there was a knowledge gap I needed to fill in if I was to improve my interviewing technique and data access (Trinczek, 2009). Indeed, this problem was fixed in the short-term through better preparation and in the long-term as I was building both my knowledge base and my craft of interviewing. Among the measures I employed to improve my interviewing experience was to loosen a little the interview guide. Instead of trying to control the interview, I started to listen to what my interviewees were saying and then prompt them to elaborate more on topics of my interest (Yanow & Schwartz-Shea, 2007). Interviews became more conversational in style and the responses I received more descriptive meaning long and detailed descriptions of anti-corruption practices employed by compliance officers. Indeed, expert interviews offer exclusive knowledge gained through the expert's practical everyday experience (Bogner & Menz, 2009), allowing the interviewer to evaluate and re-construct the knowledge instead of asking for it (Brinkmann & Kvale, 2008).

I started my interviews as an exploratory endeavor on a rather new area of inquiry since anti-corruption has been practiced only during the last decades. Initially, my questions were theory-laden meaning that they revolved around conceptual issues seeking to contrast or confirm rather than enable and elaborate on the views of the interviewees. For example, when I naively asked interviewees' opinions on the drivers of anti-corruption I got answers pretty much found in company's Codes of Conduct and responsibility reports as well as in books and articles. The point was that on the one hand, there was no conceptual or practical gap for me to discover, at least an obvious one. On the other hand, such questions were leading me away from the narrowly understood at that time practical knowledge I was aiming to retrieve. As a result, the data I acquired through this phase was mostly descriptive and usually referred to the official anti-corruption policy of the corporation or organization. Depending on the interviewee, the discussion also often revolved around the development of anti-corruption during the last decade locally and internationally, the emergence of the profession of the compliance officer, matters of collective action, the role of governments and

international organizations. Although the accounts of these interviewees were nothing close to the 'practical' knowledge I sought to understand in the first place, the contextual knowledge shared with me in this round contributed the most useful background. They were the base for the development of an improved interview guide, enhanced my confidence and contacts in the private sector, and helped refine my research questions.

Armed with a more elaborate interview guide and knowledge on the topic of anti-corruption, I continued interviewing anti-corruption experts. There were only 4-5 open questions in my topic guide at this point, and while in the previous phase I received broad information around corporate anti-corruption policies, it was time now to be more precise about these policies. I asked my interviewees to provide detailed descriptions of how they do what they do. If this was due-diligence, then I asked how do you do this, what criteria do you use, what do you do if you locate a risk? If the respondent was experienced in anti-corruption training, then I would insist on descriptions of either the e-learning software they used or a description of a class and face to face session. I also asked about the learning objectives and the process by which they define these, or about the reaction of their employees in these sessions. The interviews took an open and 'conversational style' (Brinkmann & Kvale, 2008) in that I was more active in directing the interviewees' responses by prompting them to elaborate on topics I was interested in (Yanow & Schwartz-Shea, 2007).

The outcome was detailed accounts of such practices which constitute the overall practice of anti-corruption and allowed for a more systematic study (Bogner & Menz, 2009). I had access now to different ways of practicing anti-corruption, and so comparison, though not always on purpose, was possible. Once some preliminary findings were available, I put them to the test with the next interviewees. For example, these preliminary findings allowed me to sketch on a piece of paper how a compliance function works, who the primary actors engage, and how they are connected to each other. This enabled me to approach the following interviews differently. Instead of relying on more or less predefined open questions, I showed and explained to the interviewees my drawing and let them evaluate it based on their own experience. The results were more than satisfying, since it was easier for them to identify or contrast the drawing and its logic. In addition, it allowed me to ask for concrete examples whenever they seemed to be interested in a particular part of the drawing. Indeed, using participants of a practice to co-interpret and reenact a practice loosely captured by the accounts

of other interviewees or through participant observation, is a technique which is useful when actual participation in a practice is not possible (Bueger, 2014). This technique contributed the most in engaging the interviewees in further and more in-depth elaborations of their work. It provided a 'grip' upon which the interviewees, by adding up or rejecting my examples, contributed in my effort to acquire a more complete view of anti-corruption practices.

Subsequently, it became possible for me to concentrate on seeking the subjective, maxims, principles, orientations and experiences which implicitly support expert and practical knowledge (Bogner & Menz, 2009). In order for this to happen, I asked my interviewees to describe anti-corruption as they were practicing it. My questions therefore revolved around daily activities and routines in performing not just the overall practice of anti-corruption but also practices within it such as due-diligence, risk assessments, training etc. The reaction to such questions was mixed. At best, my respondents would offer detailed accounts of what they do in their daily routine or use metaphors to emphasize significant aspects of their job. At worst, some interviewees remained attached to their corporate role and official position. In such cases answers were quite short and constant questioning was required to keep the interview 'alive'.

For this later phase of interviews, Nicolini's (2009) double method of interviewing, although not utilized to the full, proved quite inspiring as to the data I needed to access. That is because before my endeavor with this method, not only I was not sure about the questions to ask in an interview, but I was also quite insecure about what data would be sufficiently rich to support my study. According to double method, the interviewee is asked to pretend that his or her double will take his or her place at work the next day. However, this double does not know anything about what the interviewee does and therefore needs extremely detailed guidelines and descriptions of the interviewee's routine in order for this change not to be uncovered. In other words, the interview with the double method turns the interviewees into observers of their own practices. In so doing, according to Nicolini (2009, p. 204), they are induced 'to produce a highly idealized narrative description of the practice from a particular moral and normative angle'. These normative and moral angles, captured in *instructions* on how to do something, reveal the overall norms shaping a specific practice, and along with the descriptions of the doings and sayings offer a representation of the practice itself. I was not able to apply the method exactly as Nicolini suggests, but the few times I tried to apply it allowed me to

understand the level of detail and data I needed from my interviews. For example, when I asked one of my interviewees to explain to his double his daily professional routine, he explained in detail how he is performing due-diligence, what documents he uses, what databases he uses, how he was trained, how many hours per day he is doing that, how he communicates with other colleagues and companies, and how he assesses third parties. I decided that this was the level of detail I needed but due to the preparation that this type of interview required I also decided to access it through more traditional approaches such as open-ended questions.

7.2.2 Participant observation

The suggested method for a praxiography is participant observation since this allows for full exposure to the practice itself in real time (Bueger, 2014; Pouliot, 2013). Participant observation 'is the systematic description of events, behaviors, and artifacts in the social setting chosen for study' (Marshall & Rossman, 2016, p. 78), but as I mentioned above, in my case this option was impossible for reasons of sensitivity or lack of rapport and trust, as some scholars would arguably claim (Russell & Bernard, 2011). As a result, I turned towards other sites or sources where I could engage with the practice of anti-corruption directly (Table 7). I refer here to my participation in an executive Master Class on anti-corruption and corporate compliance which was organized by Danish business and professional private organizations. The course was one of the first to be organized in Denmark by local stakeholders and aimed to inform, educate, and certify corporate and any other people interested in the topic of anti-corruption and compliance. It was a paid service and within the six intensive days it lasted, participants were informed about current issues on anti-corruption and participated in actual case studies and simulations of due-diligence, risk-assessments, training, crisis management, investigations, and whistleblower hotlines.

Czarniawska (2007) argues that the term 'participant observation' should be used only for cases in which the researcher becomes a part of the practice themselves. In contrast, for mere observation of practices, the term 'fieldwork' should suffice. I consider my participation in the above course to belong in the participant observation category because despite its short duration it got me learning (Lave & Wenger, 1991) if not what is to be an anti-corruption and compliance officer, how to perform some of the actions they perform. In the workshops where we simulated real scenarios, we also had to simulate roles such as the CEO, compliance officer, human resources officer, CSR manager of a

company which allowed us to get some hands-on work on how compliance and anti-corruption 'feel' in corporate settings. As Bevir and Rhodes point out (2003, p. 176), 'The aim is to see the world through the eyes of the manager, top civil servant and politician.' I had the chance then to experience directly the decision-making process and how, depending on the case it was changing, the guidelines needed to be followed, the means and resources needed to be utilized, and the channels of communication between the involved actors including authorities and lawyers. The course allowed me also to learn more about the private and subjective side of the compliance officers, an aspect which is quite important in understanding the background knowledge of a practice (Bogner et al., 2009a).

Participant Observation	
Data source	Collected data
• Compliance Master Class and certification. • ISO/TC Plenary- Anti-Bribery Management International Best Practices Symposium. • Seminar on anti-corruption and compliance at the China National Institute of Standards. • TRACE E-learning session on gifts and hospitality.	✓ Anti-corruption's guiding principles and best practices. ✓ Main rules corporations seek to comply with. ✓ Decision-making and communication channels. ✓ Opinions and experiences of the participants as anti-corruption and compliance experts from private discussions. ✓ Dialogues between participants. ✓ Personal and collective feelings and emotions. ✓ Random events and stories.

Table 7: Overview of participant observation data sources and data collected

Further fieldwork took place by attending events such as seminars, webinars, workshops and a summit on the new ISO standard 37001 Anti-bribery management systems. In the latter, I had the opportunity not only to observe deliberations and negotiations of national delegations on private anti-corruption rule-setting, but also to informally discuss anti-corruption and compliance in the private sector with stakeholders. Seminars, webinars, and workshops were also a very good source of data, depending on the topic at hand. Webinars and seminars on specific practices and activities within the overall anti-corruption practice, for instance, shed light on aspects an outsider would never guess at,

such as intra-organizational competition and bureaucratic obstacles. Most importantly, however, through such events the importance of documentation and documents 'as paradigmatic artifacts of modern knowledge practices' such as anti-corruption (Riles, 2006, p. 2) became clear to me. It is really difficult to put into words the extent to which anti-corruption experts and instructors insist on the importance of documentation. Documentation is crucial from designing an anti-corruption function, to its implementation, and even in cases of failure, documents help in tracking down the errors.

In every case in which I had to observe anti-corruption practices, my identity and purpose as a researcher was stated upfront to the other participants. During the compliance course, for instance, I introduced myself and my role to the other participants, while in other events I would state my objective directly to the person I was having a conversation with. Indeed, as Bernard points out (2006, p. 390), letting people know who you are and what is your purpose allows you to dive directly into the role of 'an observer who wants to participate as much as possible'. In so doing, I noticed that reactions differ from person to person; some rather enjoyed being listened to and others seemed a bit reserved. Nevertheless, this strategy allowed me to almost freely write down comments about behaviors I considered interesting. For example, when the course started, we were asked to describe in one or two words what we would like to take from this course. Our answers were written on a whiteboard which I took a picture of and used later to initiate discussions with the other participants (Figure 1).

I usually spent one to two hours after the event to write down my mental and short field notes (Emerson, Fretz & Shaw, 2001) in greater detail. Most of the time, I tried to describe in detail the material setting; the people, their sayings, the objects, and actions that attracted my attention because it mattered in keeping the practice situated (Table 8). In this sense, my logs were very descriptive in a sensory manner (Emerson et al.). In other cases, I recalled discussions between participants in which I was present but decided to either not interfere or to not take out my notepad. An example of such a dialogue can be found in table 10 in the data analysis chapter. Other notes concerned data on anti-corruption's main regulatory framework and the impact such rules have from country to country. For example, the UK Bribery Act had an alarming impact on the Danish business environment whereas the same legislature had a rather insignificant influence in Finland.

Figure 1: Picture taken as a field note at the compliance course

7.2.3 Documents

Documents have been very important for this dissertation and study. In the previous chapter, we saw how documents support the argument that discourse is not simply a linguistic act since the example of documents as statements attributes a certain materiality on discourses. It is through this materiality that a document offers, that discourse can reach farther destinations and endure in time. Similarly, documents played a significant role in sketching the Actor-network of anti-corruption compliance which allowed the focus on the translations discussed in paper #1. Furthermore, international legislation sets the broader international framework (Riles, 1999) for anti-corruption and compliance, and likewise it is through documents that authority travels in such bureaucratic organizations such as MNCs in the form of the Code of Conduct, and it is through the use of documents that compliance

departments and officers crystalize their position as business advisors in modern corporations as we have seen in paper #2.

	Notes
#1	The course takes place in a historical building where the offices of the organizing authority are based. The class is a large room where people sit in groups of four per table. There were commercial and practical resources given to us such as pens, textbooks, and a book containing all slides from the presentations. We were welcomed by X, a lawyer working in the area of anti-corruption and compliance, and Y, an anti-corruption specialist and advisor. The idea for the course was initiated by X who communicated the idea to Y and then to the lawyer office […] The speakers and presenters of the course come mostly from the industry. Since compliance is a rather developing area of activity, industry leaders and experts can share their experience in setting up a compliance system…There are 20 participants in the course of various ages and backgrounds. I am the only person who comes from academia while there are two participants from NGOs who were granted free access. There are also a considerable number of lawyers mainly from the law firm organizing the course. The majority of participants belong to the industry and they come from various sectors. With regard to the presenters and speakers, the situation is quite similar. Most of the speakers come from companies with some sort of experience in developing anti-corruption systems.
#2	With regards to the questions and answers session there was a lot of discussion about the personal element in corruption and how to deal with that. The answer was that in this case what is needed is education and training on anti-corruption and in the short-term, preventive measures are required. I would add that disciplinary measures are also necessary to counter corrupt behaviors. Z from Microsoft challenged the tone from the top approach by saying that the tone from the middle is also important since it is middle managers who sometimes push the lower levels of a company towards corruption by requesting unrealistic targets. The answer was that there is an increase in focus on training middle managers along with the other levels of the company because they too need to understand the risk of corruption. The tone from the top helps in this direction.

Table 8: Examples of descriptive field notes taken in Copenhagen and Shenzhen respectively

I found documents an excellent source of instructions on how to practice anti-corruption (Table 9). By documents I mean here not simply the publicly available codes of conduct or best practices publications but the how-to-manuals and handbooks I collected from participating in the anti-corruption and compliance events mentioned above. These documents, usually created by anti-corruption experts in the form of PowerPoint slides and comments, included information in the form of general principles, experiences, and more specified guidelines on how anti-corruption should and

had been established in selected organizations. Authorship was claimed by the corporate actors or individuals since some of them were either the founders of such a function in their corporation or they built their own company based on their experience in the private sector.

Documents	
Data source	Collected data
Public • OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions Text. • Country reports on the implementation of the OECD Anti-Bribery Convention (United Kingdom and Denmark). • UK Bribery Act including guidance document. • Foreign Corrupt Practices Act. • Sarbanes–Oxley Act. • The United Nations Convention against Corruption document. • Various Corporate codes of conduct and CSR/Sustainability results. **Private** • 6 volumes with slides and PowerPoint (PPT) presentations on personal experiences on setting up a compliance function in a corporation and what challenges this effort entailed. PPT presentation included information on the corporate practices of anti-corruption training, risk assessment, governance, due-diligence, risk and crisis managements, and whistleblowing hotlines.	✓ Assumptions, dichotomies, categories and deep-seated presuppositions found in discourse shaping and being shaped by the anti-corruption regime. ✓ Analysis of how public abstract global regulation is translated into local more precise corporate rules and what are the consequences of this translation. ✓ Guidelines for practicing anti-corruption.

Table 9: Overview of document data sources and data collected

The instructions found in such documents referred to the steps one needs to take in given situations or to actual actions some of the presenters and lecturers took in dealing with an issue. For example, those who had established a compliance function in their company would describe in detail how they persuaded the senior management, how they sought help and advice from peers or external advisors, and what challenges and resistance they and their plans faced in the implementation phase. Others

with a long career in crisis management such as lawyers and consultants were able to instruct us thoroughly on the steps needed to be taken in the event of crisis.

A first read of these instructions showed a great deal of repetition among practitioners which maybe shows their instructive value. They all seemed to have a uniform approach as to what to do to establish the function of anti-corruption which makes sense when we consider that legislators and other similar bodies have published guidelines. In this sense, this read allowed an examination of the deep-seated presuppositions hidden in public discourse. Indeed, a second read showed that behind titles such as 'how to build an effective due-diligence process', or 'Company's X whistleblower hotline', were representations and subjective understandings of individual experiences related to the author's background, the company's sector or the geographical area in which the company was operating (Bueger & Gadinger, 2015). I found two ways to extract these experiences; the first and more direct of the two was by listening carefully and jotting down (Strauss, 1987) their descriptions and narratives. The masterclass in which I participated in this sense was a great source of such information since the practical questions of the other participants led to thorough descriptions and 'lessons' on what should be done and what should be avoided. The second required me to seek access to 'extra' and 'ego' details through interviews with the participants or other experts. In this sense, documents offered not only a platform for further elaboration on my questions on practice, but also in combination with interviews and participant observation an opportunity to triangulate the data (Bryman, 2012).

7.3 Data analysis

For the analysis of the data, I utilized the 'theory generating expert interview' guidelines (Bogner et al., 2009b; Meuser & Nagel, 2009). This method prioritizes a thematic analysis of passages scattered in the transcripts with the aim of on the one hand maintaining the same context which allows for comparison, and on the other hand a focus on the principles guiding one's practice (Bogner & Menz, 2009). The broader context within which interviewees, my comments and observations, as well as guidelines found in documents, was corporations broadly understood as organizations. These organizations, however, should not be understood as abstract entities in time and space (Nicolini, 2017). Rather, they are situated in the specific historical, discursive and material context of global governance in which corporations have been attributed extra authority and responsibility (Fuchs,

2007; Rosenau & Czempiel, 1992; Scherer et al., 2016). The focus and unit of analysis were the guiding principles of the practice of anti-corruption compliance in corporations. In so doing, I was aiming to not simply achieve an in-depth understanding of a single case study, but rather to do so without losing touch with the broader background and context. Only then was a comparison of passages and statements possible and consequently the reconstruction of the practice of anti-corruption. Once the context and the focus were set, the interpretation of the data was the outcome of a six-step process as shown in Figure 2 (p.67).

I treated all my data as discourses and therefore as subject to the same analysis method. If what matters is more the '*what* was said', and less the person who said it, then interviews, field notes, and documents can be analyzed as 'artifacts of knowledge' (Riles, 2006). I arranged the passages of each text thematically and the themes derived quite reasonably by sticking to the opinion that was expressed each time by the interviewee or author of the text (Table 10, p.68).

1) Trancription
2) Paraphrasing/thematizing
3) Coding/meaning condensation
4) Thematic comparison
5) Sociological conceptualization
6) Theoretical generalization
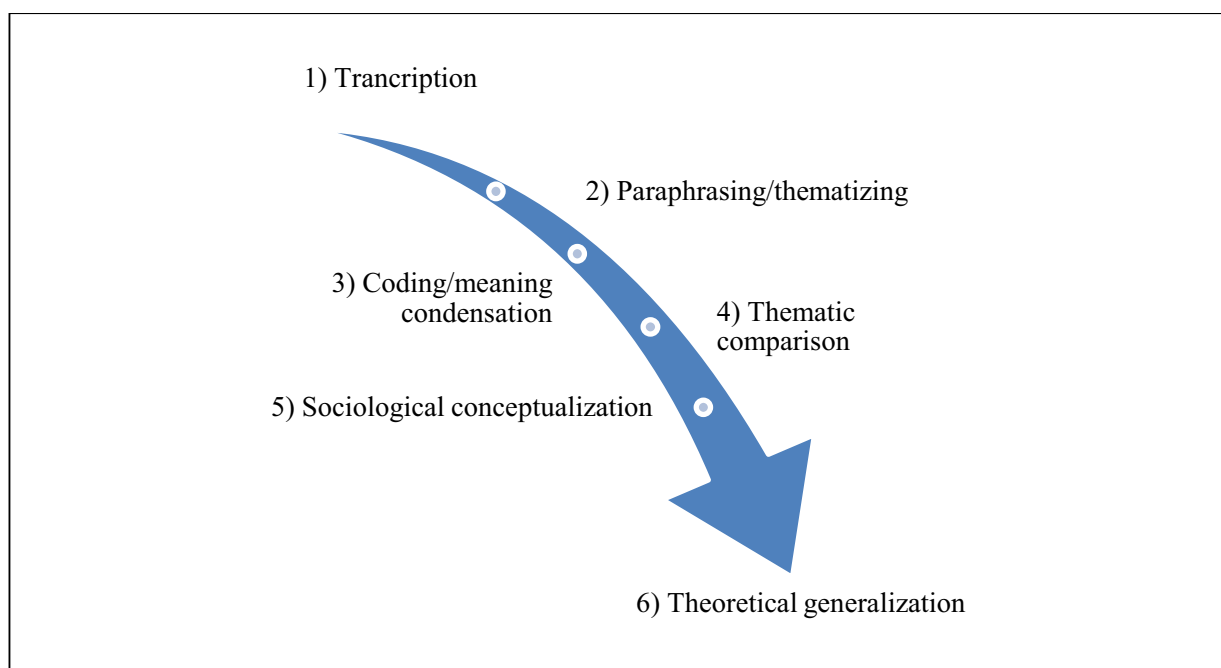
Figure 2: Theory generating expert interview data analysis (Bogner & Menz 2009)

Next, I coded the thematized passages in vivo (King, 2012) or when that was not possible, descriptively trying to stay as close as possible to the original wording (Saldana, 2009). In each

passage, there were several different codes depending on the topics addressed and the whole process resulted in several rearrangements of the passages to existing or new themes. The next step was to start the comparison of the themes from each interview or text. The result was once again new or existing themes but this time each one included many more passages and quotes from several interview transcripts and texts. Most of the themes were re-checked and often revised to form broader or more specified categories depending on the text. In order not to lose conduct with the context, an iterative process between the original text and the specific quote or excerpt that was to be included in a category was required (Schmidt, 2006).

Data source	Self-responsibility theme
Interviews	'We know people who can take on that task and I think this is the same way also with the CSR ensuring that people are getting the right ways and the right working conditions and **this is the responsibility of each employee** that works within these areas of a company.'
Participant Observation	It was lunch time and we headed towards the cafeteria to grab something to eat. There is a buffet waiting for us and while we waited for our turn, I started talking to X who is a compliance officer. I asked her whether she would be available for an interview on the matter of compliance but she kindly refused because it was only a couple of months since she had taken the position. We picked our food and sat down on a table. A couple of other participants joined us and initially the topic of discussion was me, my PhD and my forthcoming stay in China […]X asked at some point for some advice from the other two participants regarding compliance. She seemed quite nervous regarding the responsibilities deriving from such a position. She asked 'how are we to ensure that everyone in the company stays compliant? There are thousands of employees in my company…' The other two compliance officers agreed initially but explained that she has nothing to worry about because compliance is just another job like any position. They advised her that she needs to be sure that everything which is related to compliance is documented. 'That is the way you can sleep well at night and feel confident that you did your job well' one of them said, and the other followed up by saying 'if everything you want people to do is documented and communicated then **it is their responsibility** to follow, not yours'.
Document	'Expectations to managers and employees: 1. Ask: It is better to ask advice than to risk the company's reputation. **Our employees are told to be curious and our managers to listen and respond.** 2. Engage in dialogue: An open and honest dialogue is essential for us to be a responsible business. Our employees are encouraged to use Corporate Business Ethics Compliance as a business partner. 3. Speak up: **We ask the employees to let us know** – only if we know, we can act! We offer several channels, including a speak-up hotline

Table 10: Example of thematic arrangement of interview, document, and participant observation passages

Once more or less final categories were formed, my analysis entered the phase of 'sociological conceptualization' (Bogner et al., 2009b). Here I studied and analyzed extensively each category. On the one hand, categories had to be maintained 'faithful' to the original data and able to withstand a 'critical commonsense understanding' (Brinkmann & Kvale, 2008, p. 242). On the other hand, some basic links with the theory were attempted. In so doing, I used my concepts as links to test not their explanatory power but the extent to which these concepts could stay attached to both my empirics and theory. Indeed, as Schwartz-Shea and Yanow argue (2012), concepts stand somewhere between 'facts' and 'theory. Once I found a theoretical framework suitable for my data, the last phase of analysis began. Having as a starting point my basic concepts and a broad theoretical perspective, further relationships were traced and further conceptualization took place, highlighting even unnoticed areas of interest while in some cases new concepts emerged as well. For instance, the concept of translations in paper #1 inspired by ANT helped me to conceptualize interactions between compliance officers and employees not only as linguistic interpretations but also as movements of people and things. Likewise, the theoretical framework of governmentality and government analytics highlighted aspects of anti-corruption considered as 'ethics' to be rationalities of self-responsibility, a notion not necessarily similar.

8. Summaries of the papers

In the attached papers, I elaborate on and analyze different aspects of anti-corruption as these were depicted in the main and secondary research questions. I started writing the papers after the completion of my fieldwork and as a result their arrangement in the thesis reflects not the development of my empirical work but rather how my own understanding and view of anti-corruption as a social practice(s) or aspects of it have been developing in the last three years.

To put this into perspective, Latour's (2005) approach to the study of social phenomena from an 'oligopticon' and 'panorama' point of view is required (Table 11, 3rd row, p.70). In contrast with Foucault's concept of the panopticon which enables the observer to see anything at any time, oligoptica, pertain to a point of view which enables the researcher to narrow down his or her focus to the extent that what is observed can be done so in great detail at the cost, however, of the big picture. Panoramas, on the other hand, are point of views which enable the researcher to see the full picture

of a practice but nothing beyond that. Having said that, panoramas do not show the whole truth but rather a representation of a practice as this would be depicted in a given moment on a 360 degrees painting. Indeed, when I started analyzing my data, the need to *zoom in* and know exactly and thoroughly what compliance officers do was at its zenith. In so doing, I was interested in studying and understanding how compliance officers establish a function of anti-corruption and what are the ways they do so with regards to their colleagues and the organization as a whole. Paper #1, for example, shows how compliance officers establish such a function and what strategies they use in order to do so. As my need for detail was gradually being satisfied, I started to be interested in the broader picture of anti-corruption practice. Zooming out and the use of panoramas, however, raises questions regarding the 'optics' and 'audience' this projection of the practice is addressed to. Indeed, papers #2 and #3 concern such questions.

In paper #2, I was interested in finding out how anti-corruption is thought of by compliance officers. Note here that 'thought' is conceived as collective activity (Dean, 2009) shaping and shaped by the practice of anti-corruption. Paper #2, therefore, is concerned with what Foucault and his followers would call rationalities of government as the 'forms of thought, knowledge, expertise, …employed in practices of governing' (Dean, 2010, p. 42; Rose & Miller, 2010). Likewise, in paper #3, the panorama depicts an even larger image of anti-corruption, one that exceeds the physical corporate space highlighting sides of anti-corruption which have received less attention than others though equally important for its constitution as a social phenomenon (Pouliot & Thérien, 2017). Table 11 offers a summary of the papers, their focus, findings, and contributions.

8.1 Paper #1 - Translating corporate anti-corruption: How ethics are integrated into business
The paper departs from two observations; first, anti-corruption is not a default function in organizations and therefore needs to be integrated. Second, while scholars have looked into corporate anti-corruption as a behavioral phenomenon, they have rarely inquired how anti-corruption is established as a function in corporations and who and by what means does so. In this paper, I build on Actor-network theory's (ANT) concept of translations to understand how compliance officers establish an anti-corruption function in organizations. One form of translation is the *enrollment* of members to the network by translating and interpreting their interests through encouragement of participation, discussion, and deliberation (Callon, 1984).

	Paper 1 *Translating corporate anti-corruption: How ethics are integrated into business*	**Paper 2** *Anti-corruption and its inherent tension: When rationalities of self-responsibility meet business identities*	**Paper 3** *Anti-corruption in practice*
Paper Research Question	How is anti-corruption integrated with business practices in multinational companies?	How is anti-corruption thought of in multinational companies?	How is anti-corruption practiced?
Theoretical focus	Actor-network theory (Latour, 1987, 2005)	Governmentality and government analytics (Dean, 2010).	International practices (Adler & Pouliot, 2011b)
Analytical approach/ Unit of analysis	Oligopticon (Zoom in) / Translations	Panorama (Zoom out) / Thoughts (Rationalities-identities)	Panorama (Zoom out) / Practices
Empirical focus	Compliance officers and their action on anti-corruption in organizations.	Compliance officers and their thoughts on anti-corruption in organizations.	Anti-corruption practices.
Key findings	Compliance officers use at least three strategies/translations (enrollment, problematization, interessement) to integrate anti-corruption into business practices.	Tension between rationalities of self-responsibility and identities of compliance officers as business advisors.	The unintended consequences of anti-corruption practices are as important and necessary for the constitution of anti-corruption as the intended consequences.
Paper contribution	The political aspect of corporations is to be found not only in the relations between the company and its external stakeholders but also in the relationship between the company and its members.	Anti-corruption is usually perceived as a unified set of controls with a single aim but this paper shows that not only it consists of different modes of thought but that these thoughts may point towards different orientations.	The paper highlights the 'social infrastructure' of anti-corruption which is usually obscured by institutional approaches and their tendency to overemphasize landmark events and actors.

Table 11: Overall summary of the papers

Another form of translation is '*interessement*', a transaction between three actors; this takes place when the main actor attempts to attract a second actor by placing themselves between the second and a third actor (Callon et al., 1986). In addition, '*problematization*', is another form of translation

whereby an actor attempts to attract actors to the network by establishing 'an equivalence between two problems that requires those who wish to solve one to accept a proposed solution for the other' (Callon et al., 1986, p. xvii).

I found that compliance officers use these three strategies and in so doing: 1) business practices turn into risks through the practice of risk assessment; 2) risks bring forth expectations of responsibility in the form of anti-corruption; 3) anti-corruption is translated into compliance. Compared to corruption risks and anti-corruption, compliance is a much narrower and thus more manageable issue since it is restricted to the corporation and its own rules. The paper contributes empirically by providing practical insights into the workings of anti-corruption. In this sense it may be very helpful to practitioners and managers and the overall exchange and dissemination of best practices and strategies in diffusing anti-corruption as a default approach to business.

From a theoretical perspective the paper makes two contributions regarding the sociopolitical role of corporations in globalization; first, by showing that anti-corruption, a policy of social importance, is translated to compliance, a corporate strategy, it emphasizes that responsibility moves from social to corporate objectives such as compliance with the 'letter' but not the 'spirit' of the law. According to scholars concerned with corporate behavior, MNCs have gained enormous economic and political power which allows them to compete with governments in terms of capabilities (Fuchs, 2007). Likewise, other scholars have emphasized the voluntary willingness of MNCs to take on or contribute to the solution of social issues caused by globalization (Scherer et al., 2016). Yet the findings of this paper show that this might not be the case; MNCs either cannot or do not want to fight corruption as a broad social problem. In contrast, with the help of compliance officers, corporations 'appropriate' anti-corruption to their own will or capacity as compliance.

Second, such findings substantiate the claim that corporations play a political role by showing that MNCs can be political in their own right and organization. This role is not exhausted or limited to inter-organizational relations but rather it develops and becomes established within organizations. The political element is to be found not in the reaction of corporations to external expectations (Getz, 2006; Gond et al., 2011; Moon et al., 2006; Scherer, 2016). In this sense, corporate politics are 'smaller' in scale, delimited in range, and potentially powerful through bonds (or translations) between corporate members. In this case, the relationship between business and politics takes the

asymmetrical but still well-matched form of 'politics within businesses', an area worthy of exploring in my opinion.

8.2 Paper #2 - Anti-corruption and its inherent tension: When rationalities of self-responsibility meet business identities

In the second paper, I seek to reconstruct the logic of anti-corruption as a regime of practices informed and shaped by explicit bodies of knowledge such as compliance, business ethics, and risk management. I do so by examining how anti-corruption is rationalized, why, and what that means for anti-corruption as a concept. In this sense, paper #2 resembles paper #1 because it is also concerned with the role of a particular group of people and how they perform their professional tasks, but it differs in that it focuses on the element of thought in practicing anti-corruption. I build on governmentality and government analytics (Dean, 2010) studies because they allow the conceptualization of the practice of anti-corruption as a regime of practices comprised of fields of government, identities, technologies and rationalities of government (Table 3). Since corruption controls remain fairly unchanged, then the examination of anti-corruption requires an inquiry on the rationalities and identities shaping and shaped by its practice. It becomes possible then to evaluate anti-corruption not by considering it a priori a matter of business ethics, compliance, and risk management but by examining the deep-seated and guiding assumptions and logics as these are expressed in the discourses of compliance officers.

The paper contributes to anti-corruption literature by examining and problematizing the concept of anti-corruption for its robustness. Usually perceived as a unified set of controls with a single aim, this paper shows that not only does anti-corruption consist of different modes of thought but that these thoughts may point towards different orientations. In particular, anti-corruption as informed by compliance and business ethics programs prioritizes self-responsibility as the reactive and proactive objective that will lead to the elimination of the problem of organizational corruption, whereas risk management and its focus on collective responsibility seeks to rather collectively manage and organize anti-corruption instead of eradicating corruption. This tension in anti-corruption, I suggest, reflects our inconclusive knowledge with regard to the causes of corruption, as well as corruption's peculiar nature.

8.3 Paper #3 - Anti-corruption in practice

The third paper takes a broader view on the practice of anti-corruption by compliance officers. It is based on the observation that a large part of anti-corruption studies build on or take departure from a norm-based regime approach to anti-corruption. In so doing, these studies discuss either its development or the landmark events and achievements that have paved the way for anti-corruption to attain a global reach such as the FCPA and the UK Bribery Act, the OECD and UN Conventions, as well as the achievements by non-governmental organizations such as Transparency International. As a result, the paper argues that the 'social infrastructure' of anti-corruption is ignored. By social infrastructure is meant the myriad of everyday practices that constitute world politics (Adler & Pouliot, 2011a; Doty, 1996) and as such anti-corruption as well.

To address this lack of focus, the paper discusses four practices regularly, but not exclusively, performed in anti-corruption namely, *conferencing, certifying expertise, monitoring progress, public-private partnering*. I draw on International Practices theory (Adler & Pouliot, 2011b; Bueger & Gadinger, 2015), and suggest that besides norms and rules anti-corruption consists also of typical and often unwritten practices meant as 'socially organized and meaningful patterns of activities that tend to recur over time' (Pouliot & Thérien, 2017, p. 163). The object of analysis in this paper is thus these regular and subtle activities and ways in which anti-corruption is practiced in international and national contexts and which are usually obscured by the brightness of major events and landmarks of anti-corruption. By studying these practices, their intended as well as unintended consequences can be unearthed, offering empirical material that can enrich the study of anti-corruption.

The paper's contribution to anti-corruption studies is twofold; first, such practices are constitutive of anti-corruption since their intended and unintended consequences go hand in hand instead of opposing each other. Conferencing, for example, sets the platform for the creation of a common identity and at the same time gives space for elitism to emerge by excluding some rather focal groups in fighting corruption in organizations. Likewise, the professionalization of anti-corruption experts through the practice of certifying expertise is accompanied by the cultivation of their self-interest without having the possibility to ever be certain to what extent that is. On top of that, the isomorphism and uniformity of anti-corruption regulations spread out through the practice of monitoring implementation creates opportunities of resistance for those who were left outside or unsatisfied. Last

but not least, public-private partnerships allow the cooperation and matching of public and private actors in the fight against corruption (Corry, 2011; Etzioni, 1973) but they also bring forth a blurring of the boundaries between them and their roles in governance. In so doing the paper challenges the role of 'moral' and 'norm entrepreneurs' in the anti-corruption regime by offering a different view on the organization of anti-corruption based on the competent performances and action on practitioners within a socially organized context. Second, it enriches its empirical pool. This is to say that besides a small number of important and landmark events and the 'institutional entrepreneurs' surrounding them, scholars can as well as direct their attention to a virtually infinite number of everyday actions which constitute the practice of anti-corruption.

9. Findings and conclusions

More and more corporations employ corruption controls and policies in their operation yet we know little about anti-corruption in the private sector. This study asked the question how is anti-corruption practiced in multinational companies and sought to answer this by employing a social practice-based approach. The advantage offered by a practice-based approach is that this stretches the importance of human activity hence the empirical focus on anti-corruption and compliance experts. The main argument is that the practice of anti-corruption is more than the establishment of corruption control mechanisms and policies. These should be seen as elements or components of the socially constructed practice of anti-corruption along with the recursive activity of compliance officers who constantly negotiate with other members of the organization the integral workings of anti-corruption. To that end, the study sought to understand how anti-corruption is translated into business in corporations, how is it thought of by compliance officers, and how it takes place in practices beyond the narrow boundaries of the corporation.

I found that anti-corruption is constantly negotiated and constituted between organizational members as opposed to simply imposed in a top-bottom manner. It is organized through translations aiming at matching diverting interests into its cause and it is governed through technologies and rationalities of self-responsibility. Central to this practice is the activity of compliance officers who have evolved into business advisors. In the following section, I present and discuss the theoretical and empirical contributions of the above findings and discuss them in relation to the dissertation's papers, as well as extant theory and practice (Tables 12 and 13). Implications for practitioners are also discussed.

9.1 Theoretical contributions

The major contribution I make with this thesis in anti-corruption studies is the use of a practice-oriented theoretical framework which allows the integration of contradictory yet substantial views on corruption and anti-corruption. As mentioned above scholars have, for example, recognized the need for consideration of the interplay between agency and structure in the study of corruption and suggested a variety of conceptual ways to overcome this dichotomy (Ashforth et al., 2008; Lambsdorff et al., 2004). In this study I offer a novel view on how such a 'marriage' can be achieved; I argue that by conceptualizing anti-corruption as practice, agency and structure are situated within the practice of anti-corruption as necessary components of it but not as exclusive determinants of action as traditional sociological theories would suggest (Caldwell, 2012; Schatzki, 2010). Indeed, as it has been arguably claimed, an explicit focus on practice approaches aims in developing 'closer connections between what goes on deep inside organizations and broader phenomena outside' (Whittington, 2006, p. 617).

My contribution thus to anti-corruption studies is the bridging of the conceptual gap between normative approaches to corruption control and the global anti-corruption discourse. As I highlighted in the literature review, there has been a transition from an understanding of anti-corruption as a normative duty to battle corruption to a more relational approach which prioritizes the organization, proliferation, and broader implications rather than effectiveness of anti-corruption programs. In this study I bring together these two streams of research in anti-corruption studies by focusing on the one hand on compliance officers acting to establish anti-corruption as a corporate function, and on the other hand, by situating this action in the broader socio-material context in which compliance officers act as professionals. In so doing, I challenge both the 'one size fits all' solution to corruption promoted by the global anti-corruption discourse, and also the premise that corruption is matter of individual choices by examining how compliance officers actually implement anti-corruption in an organizational context.

The contribution of this study therefore consists of the exploration and examination of how the abstract discourse on anti-corruption and its organizational implementation come to terms or collide. Approaching anti-corruption as a translation (paper #1), for example, differs strongly from institutional and norm-based approaches presenting the organization as a 'bad barrel' (Kish-Gephart

et al., 2010; Pinto et al., 2008) because it challenges anti-corruption as a strict outcome of universal isomorphic pressures and diffusion (Getz, 2006; Jakobi, 2013b; McCoy & Heckel, 2001). Anti-corruption is thus not understood as a top-down process but as a negotiation between corporate members who are situated and thus relatively free to choose how to curb corrupt behaviors. In doing so, however, questions are raised as well: if anti-corruption is a matter of translation, how can we be certain that all parties make the same translation and abide with the rules in similar ways? This becomes even more evident in paper #2 where I show that tensions rise from thinking about anti-corruption both as self-responsibility and a business matter. In this sense, this study is aligned with studies questioning and examining similar tensions and their implications caused by individualistic interests in anti-corruption and compliance discourse and practice (Bukovansky, 2006; Sampson, 2016; Slager, 2017; Tsingou, 2018).

Another contribution I make with this thesis to anti-corruption studies is that I bring back agency into the anti-corruption equation. In contrast with norm-based approaches which consider corruption and anti-corruption as a matter of isomorphic pressure of socio-material structures on individuals, I advance that anti-corruption is something people in corporations do. I do so by taking advantage of the proliferation and maturation of the profession of compliance officer to bring forth the action involved in establishing an anti-corruption compliance function in an organization. However, agency is not understood here as in traditional rational choice theory in which action is determined strictly by what is inside people's heads and is described as a cost-benefit calculation (Caldwell, 2012). Against this causal relationship between intentions and action, practice approaches maintain that action is carried out within the performative doings of practice (Schatzki, 2010). In other words, agency and action are situated within the specific conditions of the practice of anti-corruption as it is happening and not prior to that. Action in anti-corruption is therefore not the outcome of a person's mind but the property of the practice itself as it is happening. The focus on situated agency allows anti-corruption to be examined not only as a 'global' problem but also as a corporate and professional challenge and opportunity. In so doing, I tie this thesis with the growing body of literature questioning not only the origins and motivation of anti-corruption in the private sector but also its organization and desired and undesired outcomes (Everett et al., 2007; Hansen, 2011; Harrison, 2006; Sampson, 2015; Slager, 2017).

The consequence of such a positioning is that it provides a roadmap for theoretical generalization on how and when action is undertaken and enabled in similar situations. By 'generalization' here I mean not universal variation but the explanation of situated dynamics (Feldman & Orlikowski, 2011). While cases may differ with regards to their context, the relationships and the dynamics developed within a single context may be useful in partly understanding similar cases. Taking, for example, one of this study's findings that anti-corruption is constantly negotiated through translations may be used to understand other contexts or organizational functions especially in the wide area of corporate compliance which covers anti-corruption and also money-laundering, data protection, human rights, and environmental protection to name but a few. None of these areas is identical with one another, yet understanding compliance as a dynamic construction rather than imposed phenomenon may help in understanding their establishment, success, or even failure.

In this sense, I also make a contribution to the business and society literature (Moon et al., 2005, 2006; Scherer et al., 2016) by substantiating and extending the claim for the political role of corporations to include in-house relationships. Much of the extant literature on CSR and global governance is concerned with the socio-political role of corporations in the era of globalization by examining the system of global governance and its impact on corporate behavior and vice versa.[6]

In contrast, in this thesis I situated the focus of inquiry in a corporate and organizational context where anti-corruption is understood as the result and not cause of action. It follows that the socio-political aspect of corporations refers not to just corporate behavior and positioning within the triangle business-state-society, but as paper #1 shows, also to the strategies employed to allow the diverging organizational interests to align and support the establishment of anti-corruption as a default corporate function. As a result, the social aspect of corporations refers more to private-to-private relationships within the organization, and the 'politics within businesses' to how such relationships construct anti-corruption as a corporate function. Indeed, as paper #2 shows, anti-corruption in companies is shaped and at the same time shaping the various bodies of knowledge upon which compliance officers apply anti-corruption.

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[6] For an exception see (Bondy, Moon, & Matten, 2012).

Literature review findings	Anti-corruption literature fragmented and therefore need for integrative models/approaches	Little focus on anti-corruption in the private sector and in particular in multinational companies	Lack of focus on practitioners and in particular compliance officers
Main RQ	How is anti-corruption practiced in MNCs?		
Paper RQs	How is anti-corruption integrated with business practices in MNCs?	How is anti-corruption thought in MNCs?	How is anti-corruption practiced?
Theoretical findings	Translations of anti-corruption to business operation	Rationalities and identities of compliance officers	Intended and unintended consequences of anti-corruption practice
Theoretical contributions	Anti-corruption as practice: ✓ Beyond the agency/structure dichotomy on anti-corruption (Thesis) ✓ Bridging corruption control and anti-corruption discourse (Thesis) ✓ Resurface (situated) agency (Paper #1) ✓ Sociopolitical role of corporations as in-house function (Papers #1 & 2) ✓ Normalization of anti-corruption (Papers #2 & #3)		

Table 12: Theoretical contribution and thesis development

Finally, I make a contribution to discussions pertaining to the normalization and de-normalization of corruption in organizations (Anand et al., 2005; Ashforth & Anand, 2003; Spicer, 2009; Zyglidopoulos et al., 2008). While scholars have analyzed how corruption becomes normalized and embedded in an organization, the process by which corruption can be de-normalized from the organizational culture remains relatively unexplored. I contribute towards this direction by showing how *anti-corruption* is normalized and rationalized as a default business function through the establishment of compliance departments and officers who rationalize themselves as business advisors and attempt to justify compliance to anti-corruption rules by translating business practices to corruption risks. Similarly, in paper #3 I show how such normalization of anti-corruption takes

place through usually unnoticed practices and their intended and unintended consequences. In contrast, however, with the de-normalization of corruption which indeed sought to answer cases of organizational corruption, anti-corruption does not require an incident or case of corruption prior to its establishment in any company. Its practice is legitimized by a global discourse emphasizing the risks and harms caused by corruption in abstract political and economic terms.

The contribution of this study therefore consists of the exploration and examination of how the abstract discourse on anti-corruption and its organizational implementation come to terms or collide. Such tensions are discussed in paper #2 while an overall argument I make is that corruption control may not always be anti-corruption's sole objective. Paper #1, for example, shows that anti-corruption may be targeting compliance with the 'letter' of the law and not necessarily the 'spirit' when applied in an organizational context. Likewise, paper #3 shows how the practice of anti-corruption brings along intended and unintended consequences with both of them being equally important for its constitution. In this sense, my work is aligned with several scholars who have questioned anti-corruption and its ultimate achievements and motivation (Bukovansky, 2006; Hansen, 2011; Sampson, 2010).

9.2 Empirical contributions

There are three empirical contribution I make with this study (Table 12). First, I show that anti-corruption becomes more and more integrated into corporations and in so doing, I contrast earlier recommendations for outsourcing such functions to third parties (Ashforth & Anand, 2003). As a result, I offer insights from the establishment and development of compliance departments in corporations and anti-corruption as a corporate profession. More particular, I examined how anti-corruption is established in corporations, who are the main stakeholders and by what means they seek to achieve their objective. I showed that the establishment of anti-corruption as a corporate function is not a matter of imposition, good will, or exemplar behavior but requires a wide range of 'allies', supportive mechanisms, strategies and motivation to be assembled. In addition, I also explored and critically examined the drivers and interests of compliance officers when performing their duties. I found that as professionals, compliance officers do have a sense of self-responsibility but also a self-interest in strengthening their position within the company but also in securing the viability of their profession. My work thus sides with an increasing number of scholars who are looking into the role

of similar professions such as accountants (Everett et al., 2007; Slager, 2017), anti-money laundering professionals (Tsingou, 2018), and lawyers (Hansen & Tang-Jensen, 2015) questioning their engagement and motivation in the practice of compliance and anti-corruption.

Empirical contributions	a. Anti-corruption as a corporate profession and the establishment of compliance departments in the corporation
	b. Anti-corruption as enabler of communication
	c. Human capital as crucial element of anti-corruption

Table 13: Empirical contributions

Second, my approach to anti-corruption revealed that anti-corruption and the way it is established in corporations enables communication between various layers of the organization. Scholars in organization and management studies have argued that corruption often is caused by a lack of communication between organizational layers of a corporation resulting in setting unrealistic sales and financial goals (Ashforth & Anand, 2003; Ashforth et al., 2008; Brief et al., 2001). Indeed, my own fieldwork and conduct with compliance officers led me also to realize that compliance should be a concern of the top, middle, and lower layers of an organization alike. For any corporate strategy or goal to be achieved communication between these layers is required. Compliance plays such a role; it gathers information from the organizational operation, locates the risks, communicates those to top management, gets the mandate to make changes, and finally it communicates these changes across the organization and to whoever poses or faces corruption risk. Anti-corruption thus requires both on the excellent knowledge of an organization's daily operations so to be able to locate and mitigate the exact corruption risks, and on its access and ability to influence the company's strategic objectives so as to secure the endurance of a culture of compliance in the long term. In this sense, my work is aligned with scholars and practitioners seeking to understand how anti-corruption enables and facilitates corporate governance by diffusing 'an organizational culture of compliance' (Key, 1999; McGovern, 2016; Paine, 1994; Schwartz, 2013; Thomson Reuters, 2016; Verhezen, 2010).

Third, my engagement with corporate compliance and anti-corruption offered another empirical contribution; the importance of human capital. International and national guidance on anti-corruption and its implementation on organizations advances a risk-based 'one size fits all' solution whereby

corruption is to be curbed if a number of corruption control mechanisms such as risk assessment, training, due-diligence, and whistle-blower hotlines will be established. My study on anti-corruption, while it does not doubt the importance and necessity of corruption control mechanisms and controls, advances that anti-corruption is also a matter of people. How essential is the contribution of people in anti-corruption becomes evident in the recent example of money laundering in Danske Bank is evident of the importance of the above contribution. Danske Bank had been warned about the risk of money laundering from its Estonian branch in 2007 and ignored it repeatedly (Batchelor, 2018). This shows that controls were in place and worked as they should yet no one acted on this information. The extent to which this failure to act rests on poorly trained personnel, lack of compliance officers, or indifferent leadership remains to be seen. What is important, I argue, is to realize that human capital is vital in the establishment of a robust anti-corruption and compliance function.

9.3 Implications for practitioners

9.3.1 Business- other private actors

Business and other private actors may benefit from the current study in the following ways; *first*, my research on anti-corruption offers insights on current techniques and strategies compliance officers utilize to achieve their objective. This, on the one hand, offers inspiration to companies in the process of internationalization of their operation by sketching not only the expectations they need to fulfil in global settings but also the human and material resources such an endeavor requires. Likewise, companies and practitioners may find strategies on anti-corruption discussed in this study as guidance for establishing other compliance areas such as data protection, human rights, environmental protection, piracy and human trafficking. On the other hand, and to more experienced practitioners and companies, the current study shows also the limits of compliance and anti-corruption practices. It creates thus incentives for further improvement of current practices or improvisation for new ones. Indeed, companies with mature compliance systems explore their options with regards to utilizing technology to achieve similar or even better results.

Second, managers may find this study useful in understanding the work of compliance officers and what are the merits and pitfalls of their approach. As discussed in the empirical contributions section, it is not always the case that people within an organization are aware of the work of their colleagues even more so in global companies which employ thousands in various locations around the world. A

reader of the current dissertation may acquire a broader view of what compliance in general and anti-corruption in particular entails and how he or she can take advantage of the merits but also avoid or mitigate the pitfalls. *Third*, for institutional actors in the private sector such as business collective organizations, this study helps them to re-examine their policies and recommendations against the practices and reasoning anti-corruption is applied in practice. In doing so, this study mitigates to some extent the 'one size fits all' solution to anti-corruption by providing a more grounded and practical base for the review and revision of the recommended policies on anti-corruption. More concretely, this study may serve as feedback regarding the way anti-corruption is practiced based on broad international regulations by putting these to the test against a variety of factors such as cultural barriers, corporate strategy or the professional interests of compliance officers.

9.3.2 Policy makers and regulators

To policy makers such as governmental authorities and international organizations this study shows how compliance officers implement their regulations and guidance. By definition then the study can serve as a platform for improvements and further optimization by taking into consideration not just broad expectations and trends but also practicalities and details on how anti-corruption is practiced in MNCs. The study shows for example which areas and aspects of anti-corruption corporations are more likely to be implemented, how, and why. Understanding the difference between anti-corruption and compliance and what benefits and problems each concept serves and aims to address may be helpful in providing more detailed guidance and regulation. In other words and as mentioned above, the current study may again serve as feedback and in so doing rebalance the expectation that corporations can be solely responsible for anti-corruption.

Following the above, policy makers and practitioners will find this study interesting for its approach to public-private relationships as not necessarily contradictory but also as supplementary in practice. This derives from the focus of this study on compliance officers who merge public and private rules and transform them to everyday guidance for their colleagues. Having this as a starting point, regulators and policy makers, may be benefited from this study in two ways; first, based on the practical insights offered in this study from the work of compliance officers, regulators, may realize the merits of a more practice-centered approach when designing regulations. As mentioned above, humans matter in corruption and anti-corruption is something people in corporations do. In doing so

the practical gap between abstract rules and their implementation may be lessened. Second, this study enables policy makers to realize the extent to which anti-corruption in practice fulfils its intended objective and what the unintended consequences of such a policy maybe. The way compliance officers for example narrow down anti-corruption to mere compliance in everyday corporate operation can be a resource for regulators and public authorities concerned with the performance and improvement of extant regulations.

Overall, this study can enhance the ability of relevant actors to see anti-corruption beyond a top-bottom approach where corporations are seen as both responsible for corruption and as a result also as sole responsible for curbing it. In this sense, this study offers an excellent resource for practitioners to understand the several ways anti-corruption can be practiced and the intended and unintended consequences produced by such implementation.

9.4 Limitations and future research

Taking my departure from the importance of human capital in compliance, this study's major limitation was the limited access to sites in which such human activity may be observed extensively. As mentioned in the methodology section, the suggested method for practice-based studies is participant observation or ethnography which allows the researcher to experience the practice by learning and living it (Bueger & Gadinger, 2014). For the reasons I have explained above, only limited participant observation was possible and this affected this study in three ways: first, the practice of anti-corruption was 'captured' only indirectly and it therefore may be vulnerable to subjective idealizations or simplifications; second, although there were indications and some leads on how people resist change in the way they do business, limited access rendered further research impossible at that particular time at least; third, the resulted reliance on interviews and indirect descriptions of anti-corruption practices caused a limited engagement with the materiality of the practice of anti-corruption. Future studies should therefore focus on the material aspect of anti-corruption. What do non-human elements bring into anti-corruption? How do they limit but also enable its practice? What is the role of technology in addressing corruption globally and what about digital corruption?

Another limitation of this study comes from its focus on the enactment or performance of practices but not on their interconnectivity which is an understudied area (Hui, 2017). Although some theoretical indications on how practices create a mesh (Schatzki, 2005) or network (Latour, 2005)

has been provided, in effect, this study barely touches this topic. How do compliance practices, of which anti-corruption is only one aspect, connect with each other to create the broader practice of business ethics or sustainability, and moreover how do such practices mesh (or not) with traditional financial business practices to form what is considered the modern corporation and its broadened interest in social issues? Insights into practice interconnectivity may provide analytical depth on complicated and debated issues such as the sociopolitical role of corporations. With regards to the latter, this study showed how corporations play a political role not only in relation to other similar organizations but also in relation to their members. The constant negotiation of anti-corruption is a political act that takes place between organizational members. A study and comparison of the different sociopolitical roles in which corporations seem to engage from a practice perspective may offer a meaningful understanding of their overall role in the era of globalization.

References

Abbink, K. (2000). Fair Salaries and the Moral Costs of Corruption.

Abbink, K., Irlenbusch, B., & Renner, E. (1999). An Experimental Bribery Game. *The Journal of Law, Economics, & Organization 18:*, *18*, 428–454.

Abbink, K., & Wu, K. (2017). Reward self-reporting to deter corruption: An experiment on mitigating collusive bribery. *Journal of Economic Behavior and Organization*, *133*, 256–272.

Acemoglu, D., & Verdier, T. (2000). The choice between market failures and corruption. *American Economic Review*, *90*(1), 194–211.

Ades, A., & di Tella, R. (2003). The New Economics of Corruption: A Survey and some New Results. *Political Studies*, *45*(3), 496–515.

Ades, A., & Di Tella, R. (1999). Rents, Competition, and Corruption. *The American Economic Review*, *89*(4), 982–993.

Adler, E., & Pouliot, V. (2011a). International practices. *International Theory*, *3*(3), 1–36.

Adler, E., & Pouliot, V. (Eds.). (2011b). *International Practices*. Cambridge: Cambridge University Press.

Ahrens, T., & Chapman, C. S. (2007). Management accounting as practice. *Accounting, Organizations and Society*, *32*(1–2), 1–27.

Alexander, J. C., & Smith, P. (1993). The Discourse of American Civil Society: A New Proposal for Cultural Studies. *Theory and Society*, *22*(2), 151–207.

Almond, M. A., & Syfert, S. D. (1997). Beyond Compliance: Corruption, Corporate Responsibility and Ethical Standards in the New Global Economy. *North Carolina Journal of International Law and Commercial Regulation*, *22*(2).

Anand, V., Ashforth, B. E., & Joshi, M. (2005). Business as Usual: The Acceptance and Perpetuation of Corruption in Organizations. *The Academy of Management Executive*, *19*(4), 9–23.

Anders, G., & Nuijten, M. (2007). Corruption and the Secret of Law: An Introduction. In G. Anders & M. Nuijten (Eds.), *Corruption and the Secret of Law* (pp. 1–24). Hampshire: Ashgate Publishing Limitied.

Andersen, T. J., Garvey, M. L., & Roggi, O. (2014). *Managing risk and opportunity : the governance of strategic risk-taking*. Oxford: Oxford UP.

Andersson, L. M., & Pearson, C. M. (1999). Tit for Tat? The Spiraling Effect of Incivility in the Workplace. *The Academy of Management Review*, *24*(3), 452–471.

Andreas, P., & Nadelmann, E. (2006). *Policing the globe: Criminalization and crime control in international relations*. Oxford: Oxford University Press.

Apke, T. M. (2001). Impact of OECD Convention anti- bribery provisions on international companies. *Managerial Auditing Journal*, *16*(2), 58–63.

Arellano, D. G. (2017). Corruption as an organizational process: Understanding the logic of the denormalization of corruption. *Contaduría y Administración*, *62*(3), 827–842.

Argandoña, A. (2003). Private-to-private Corruption. *Journal of Business Ethics*, *253–267*(47).

Argandoña, A. (2005). Corruption and Companies: The Use of Facilitating Payments. *Journal of Business Ethics*, *60*, 251–264.

Argandoña, A. (2007). The United Nations Convention Against Corruption and its Impact on International Companies. *Journal of Business Ethics*, *74*(4), 481–496.

Armantier, O., & Boly, A. (2011). A controlled field experiment on corruption. *European Economic Review*, *55*(8), 1072–1082.

Ashforth, B. E., & Anand, V. (2003). The normalization of corruption in organizations. *Research in Organizational Behavior*, *25*, 1–52.

Ashforth, B. E., Gioia, D. A., Robinson, S. L., Treviño, L. K., Ashforth, B. E., Gioia, D. A., & Robinson, S. L. (2008). Re-Viewing Organizational Corruption. *Academy of Management Review*, *33*(3), 670–684.

Babic, M., Fichtner, J., & Heemskerk, E. M. (2017). The International Spectator Italian Journal of International Affairs States versus Corporations: Rethinking the Power of Business in International Politics. *The International Spectator: Italian Journal of International Affairs*, *52*(4), 20–43.

Bacchi, C. (2009). *Analysing Policy: What's the problem represented to be?* Frenchs Forest: Pearson Australia.

Bacchi, C. (2012). Why Study Problematizations? Making Politics Visible. *Open Journal of Political Science*, *2*(1), 1–8.

Bacchi, C., & Bonham, J. (2014). Reclaiming discursive practices as an analytic focus : Political implications. *Foucault Studies*, *17*(17), 173–192.

Bardhan, P. (1997). Corruption and Developmet: A Review Development of Issues. *Journal of Economic Literature*, *35*(3), 1320–1346.

Bardhan, P. (2006). The Economist's Approach to the Problem of Corruption. *World Development*, *34*(2), 341–348.

Barnes, B. (2001). Practices as collective action. In T. R. Schatzki, K. Knorr-Cetina, & E. von Savigny (Eds.), *The Practice Turn in Contemporary Theory*. London and New York.

Barr, A., & Serra, D. (2010). Corruption and culture: An experimental analysis. *Journal of Public Economics*, *94*(11–12), 862–869.

Batory, A. (2012). Why do anti-corruption laws fail in Central Eastern Europe? A target compliance perspective. *Regulation & Governance*, *6*(1), 66–82.

Baucus, M. S., & Baucus, D. A. (1997). Paying the Piper: An Empirical Examination of Longer-Term Financial Consequences of Illegal Corporate Behavior. *Source: The Academy of Management Journal*, *40*(1), 129–151.

Baughn, C., Bodie, N. L., Buchanan, M. A., & Bixby, M. B. (2010). Bribery in international business transactions. *Journal of Business Ethics*, *92*(1), 15–32.

Beck, U. (1992). *Risk Society: Towards a New Modernity*. *Society*. London: Sage Publications.

Becker, G. S., & Stigler, G. J. (1974). Law Enforcement, Malfeasance, and Compensation of Enforcers. *The Journal of Legal Studies*, *3*(1), 1–18.

Berger, R., Herstein, R., Silbiger, A., & Barnes, B. R. (2018). Is guanxi universal in China? Some evidence of a paradoxical shift. *Journal of Business Research*, *86*, 344–355.

Bernard, H. R. (2006). *Research methods in anthropology: Qualitative and quantitative approaches* (Fourth). Lanham: Altamira Press.

Bernhagen, P., & Mitchell, N. J. (2010). The Private Provision of Public Goods: Corporate Commitments and the United Nations Global Compact. *International Studies Quarterly*, *54*(4), 1175–1187.

Berninghaus, S. K., Haller, S., Krüger, T., Neumann, T., Schosser, S., & Vogt, B. (2013). Risk attitude, beliefs, and information in a Corruption Game - An experimental analysis. *Journal of Economic Psychology*, *34*, 46–60.

Bevir, M., & Rhodes, R. A. W. (2003). *Interpreting British governance*. Routledge.

Bjønskov, C., & Paldam, M. (2005). Corruption trends. In Johann Graf Lambsdorff, M. Taube, & M. Schramm (Eds.), *The new institutional economics of corruption*. Abigton, Oxon: Routledge.

Blalock, J. (2001). International Anti-Corruption Conference: Present at the Beginning. *The Journal of Public Inquiry*, *Fall/Winte*.

Bogner, A., Littig, B., & Menz, W. (Eds.). (2009a). *Interviewing Experts*. Palgrave Macmillan.

Bogner, A., Littig, B., & Menz, W. (2009b). Introduction: Expert Interviews — An Introduction to a New Methodological Debate. In *Interviewing Experts* (pp. 1–13). London: Palgrave Macmillan UK.

Bogner, A., & Menz, W. (2009). The Theory-Generating Expert Interview: Epistemological Interest, Forms of Knowledge, Interaction. In *Interviewing Experts* (pp. 43–80). London: Palgrave Macmillan UK.

Bondy, K., Moon, J., & Matten, D. (2012). An Institution of Corporate Social Responsibility (CSR)

in Multi-National Corporations (MNCs): Form and Implications. *Journal of Business Ethics*, *111*(2), 281–299.

Bourdieu, P. (1977). Outline of a Theory of Practice. *Cambridge Studies in Social Anthropology*, *16*(16), 248.

Bourdieu, P. (1990). *The logic of practice*. (R. Nice, Ed.). Stanford: Stanford University Press.

Bourdieu, P. (2000). *Pascalian Meditations* (Translated). Stanford, California: Stanford University Press.

Bourdieu, P., Chamboredon, J. C., & Passeron, J. C. (1991). *The Craft of Sociology: Epistemological Preliminaries*. Berlin: Walter de Gruyter & Co.

Bradbury, H., & Bergmann Lichtenstein, B. M. (2000). Relationality in Organizational Research: Exploring The Space Between. *Organization Science*, *11*(5), 551–564.

Branigan, T. (2013). Xi Jinping vows to fight "tigers" and "flies" in anti-corruption drive. *The Guardian*. Retrieved from https://www.theguardian.com/world/2013/jan/22/xi-jinping-tigers-flies-corruption

Brewster, R. (2017). Enforcing the FCPA: International resonance and domestic strategy. *Virginia Law Review*, *103*(8), 1611–1682.

Brief, A. P., Buttram, R. T., Dukerich, J. M., Buttram, R. T., & Dukerich, J. M. (2001). Collective Corruption in the Corporate World: Toward a Process Model. In M. E. Turner (Ed.), *Groups at Work: Theory and Research*. London: Routledge.

Brinkmann, S., & Kvale, S. (2008). *Interviews: Learning the Craft of Qualitative Research Interviewing* (2nd ed.). London: SAGE Publications, Inc.

Brown, B., & Cousins, M. (1980). The linguistic fault: The case of Foucault's archaeology. *Economy and Society*, *9*(3), 251–278. Retrieved from http://www.tandfonline.com/doi/abs/10.1080/03085148008538597

Brown, E., & Cloke, J. (2004). Neoliberal reform, governance and corruption in the south: Assessing the international anti-corruption crusade. *Antipode*, *36*(2), 272–294.

Bryman, A. (2012). *Social research methods*. Oxford University Press.

Bueger, C. (2014). Pathways to practice: praxiography and international politics. *European Political Science Review*, *6*(03), 383–406.

Bueger, C., & Gadinger, F. (2014). *International practice theory: New perspectives*. *International Practice Theory: New Perspectives*. London: Palgrave Macmillan UK.

Bueger, C., & Gadinger, F. (2015). The Play of International Practices. *International Studies Quarterly*, *59*(3), 449–460.

Bukovansky, M. (2006). The hollowness of anti-corruption discourse. *Review of International Political Economy*, *13*(2), 181–209.

Burchell, G., Gordon, C., & Miller, P. (Eds.). (1991). *The Foucault Effect: Studies in Governmentality*. Chicago: The University of Chicago Press.

Cabantous, L., Gond, J.-P., & Johnson-Cramer, M. (2010). Decision Theory as Practice: Crafting Rationality in Organizations. *Organization Studies*, *31*(11), 1531–1566.

Calderón, R., Luis, J., Lvarez-Arce, A. ´, & Mayoral, S. (2009). Corporation as a Crucial Ally Against Corruption. *Journal of Business Ethics*, *87*, 319–332.

Caldwell, R. (2012). Reclaiming Agency, Recovering Change? An Exploration of the Practice Theory of Theodore Schatzki. *Journal for the Theory of Social Behaviour*, *42*(3), 283–303.

Callon, M. (1984). Some elements of a sociology of translation: domestication of the scallops and the fishermen of St Brieuc Bay. *Sociological Review*, *32*(1_suppl), 196–233.

Callon, M., & Latour, B. (2014). Unscrewing the big Leviathan: How actors macrostructure reality and sociologists help them to do so. In K. Knorr-Cetina & A. Cicourel (Eds.), *Advances in Social Theory and Methodology: Toward an Integration of Micro- and Macrosociologies*. Abigton, Oxon: Routledge & Kegan Paul.

Callon, M., Law, J., & Rip, A. (Eds.). (1986). *Mapping the Dynamics of Science and Technology*. Houndmills,Basingstoke, Hampshire RG212XS: The MacMillan Press LTD.

Campos, N. F., Estrin, S., & Proto, E. (2010). *Corruption as a Barrier to Entry: Theory and Evidence* (Discussion Paper Series IZA DP No. 5243). Bonn.

Carver, T. (2002). Discourse analysis and the "linguistic turn." *European Political Science*, 50–53.

Clarke, A. E. (2005). *Situational Analysis: Grounded Theory After the Postmodern Turn*. Thousand Oaks California: SAGE Publications Inc.

Collins, H. M. (2001). What is Tacit Knowledge? In T. R. Schatzki, K. Knorr-Cetina, & T. Savigny Eike (Eds.), *The Practice Turn in Contemporary Theory* (pp. 115–128). New York: Routledge.

Corradi, G., Gherardi, S., & Verzelloni, L. (2010). Through the practice lens: Where is the bandwagon of practice-based studies heading? *Management Learning*, *41*(3), 265–283.

Corry, O. (2011). Defining and theorizing the Third Sector. In R. Taylor (Ed.), *Third Sector Research* (pp. 11–20). New York: Springer.

Cousins, M., & Hussain, A. (1984). *Michel Foucault*. Macmillan.

Crane, A., Matten, D., & Moon, J. (2008). *Corporations and Citizenship*. Cambridge: Cambridge University Press.

Crossley, N. (2005). *Key concepts in critical social theory*. London: SAGE.

Cutler, C. (2001). Critical reflections on the Westphalian assumptions of international law and organization: a crisis of legitimacy. *Review of International Studies*, *27*(02), 133–150.

Czarniawska, B. (2007). *Shadowing : and other techniques for doing fieldwork in modern societies*. Liber.

Czarniawska, B., & Sevon, G. (Eds.). (1996). *Translating Organizational Change*. New York: de Gruyter.

Danish Commerce and Companies Agency. (2010). *Corporate Social Responsibility and Reporting in Denmark - Impact of the legal requirement for reporting on CSR in the Danish Financial Statements Act*. Retrieved from https://samfundsansvar.dk/sites/default/files/corporate_social_responsibility_and_reporting_in _denmark_september_2010.pdf

Dansk Industri. (2014). *KORRUPTION SOM UDFORDRING DI ANALYSE-ikke show-stopper*. Retrieved from https://di.dk/SiteCollectionDocuments/Afsætningspolitik/Korruption som udfordring_WEB.pdf

Darrough, M. N. (2010). The FCPA and the OECD convention: Some lessons from the U.S. experience. *Journal of Business Ethics*, *93*(2), 255–276.

Dávid-Barrett, E. (2019). Business unusual: collective action against bribery in international business. *Crime, Law and Social Change*, *71*, 151–170.

De Maria, W. (2008). Measurements and markets: Deconstructing the corruption perception index. *International Journal of Public Sector Management*, *21*(7), 777–797.

De Rosa, D., Gooroochurn, N., & Görg, H. (2010). *Corruption and Productivity Firm-level Evidence from the BEEPS Survey*. Retrieved from http://econ.worldbank.org.

Dean, M. (2009). *Governmentality: Power and Rule in Modern Society,* (2nd ed.). London: SAGE Publications Inc.

Dean, M. (2010). *Governmentality: Power and Rule in Modern Society* (2nd ed.). London: SAGE Publications Ltd.

della Porta, D. (2004). The governance mechanisms of corrupt transactions. In Johann Graf Lambsdorff, M. Taube, & M. Schramm (Eds.), *The new institutional economics of corruption* (pp. 152–180). Abigton, Oxon: Routledge.

della Porta, D. (2017). Anti-corruption from below: Social movements against corruption in late neoliberalism. *Partecipazione e Conflitto*, *10*(3), 661–692.

Deng, X., Zhang, L., & Leverentz, A. (2010). Official Corruption During China's Economic Transition: Historical Patterns, Characteristics, and Government Reactions. *Journal of Contemporary Criminal Justice*, *26*(1), 72–88.

Dong, B., & Torgler, B. (2013). Causes of corruption: Evidence from China. *China Economic*

Review, *26*, 152–169.

Doty, R. L. (1996). *Imperial Encounters: The Politics of Representation in North-South Relations*. Mineapolis: University of Minnesota Press.

Echeverri, P., & Skålén, P. (2011). Co-creation and co-destruction: A practice-theory based study of interactive value formation. *Marketing Theory*, *11*(3), 351–373.

Emerson, R. M., Fretz, R. I., & Shaw, L. L. (2001). Participant Observation and Fieldnotes. In P. Atkinson, A. Coffey, S. Delamont, J. Lofland, & L. Lofland (Eds.), *Handbook of Ethnography*. SAGE Publications Ltd.

Ethisphere. (2017). *Anti-Bribery & Corruption Benchmarking report-2017: Beyond regulatory Enforcement. The rise of reputational risk*.

Etzioni, A. (1973). The Third Sector and Domestic Missions. *Public Administration Review*, *33*(4), 314–323.

Everett, J., Neu, D., & Rahaman, A. S. (2006). The global fight against corruption: A foucaultian, virtues-ethics framing. *Journal of Business Ethics*, *65*(1), 1–12.

Everett, J., Neu, D., & Rahaman, A. S. (2007). Accounting and the global fight against corruption. *Accounting, Organizations and Society*, *32*(6), 513–542.

FAFPI. (2018). Home page -. Retrieved January 16, 2019, from https://www.fafpi.com/

Feldman, D. C. (1984). The Development and Enforcement of Group Norms. *The Academy of Management Review*, *9*(1), 47–53.

Feldman, M. S., & Orlikowski, W. J. (2011). Theorizing Practice and Practicing Theory. *Organization Science*, *22*(5), 1240–1253.

Feldman, M. S., & Pentland, B. T. (2003). Reconceptualizing Organizational Routines as a Source of Flexibility and Change. *Administrative Science Quarterly*, *48*(1), 94.

Felps, W., Mitchell, T. R., & Byington, E. (2006). Research in Organizational Behavior: An Annual Series of Analytical Essays and Critical Reviews Research in Organizational Behavior. *Research in Organizational Behavior*, *27*, 175–222.

Fenton Villar, P., & Papyrakis, E. (2017). Evaluating the impact of the Extractive Industries Transparency Initiative (EITI) on corruption in Zambia. *The Extractive Industries and Society*, *4*(4), 795–805.

Fichter, R. (2018). Do the Right Thing! Developing Ethical Behavior in Financial Institutions. *Journal of Business Ethics*, *151*(1), 69–84.

Finnemore, M., & Sikkink, K. (1998). International Norm Dynamics and Political Change. *International Organization*, *52*(4), 887–917.

Fisman, R., & Miguel, E. (2007). Corruption, Norms, and Legal Enforcement: Evidence from Diplomatic Parking Tickets. *Journal of Political Economy*, *115*(6), 1020–1048.

Flick, U. (2009a). *An Introduction To Qualitative Research* (4th ed.). London: SAGE Publications Ltd.

Flick, U. (2009b). *An Introduction To Qualitative Research* (Fourth). Thousand Oaks California: SAGE Publications Ltd.

Foucault, M. (1982). The Subject and Power. *Critical Inquiry*, *8*(4), 777–795.

Foucault, M. (1991a). Politics and the Study of Discourse. In G. Burchell, C. Gordon, & P. Miller (Eds.), *The Foucault effect : studies in governmentality : with two lectures by and an interview with Michel Foucault* (p. 307). Chicago: University of Chicago Press.

Foucault, M. (1991b). Questions of Method. In G. Burchell, C. Gordon, & P. Miller (Eds.), *The Foucault Effect: Studies in Governmentality*. Chicago: The University of Chicago Press.

Foucault, M. (1995). *The Archaeology of knowledge. Routledge classics* (translated). (New York: Pantheon Books.

Foy, S. L., Schleifer, C., & Tiryakian, E. A. (2018). The Rise of Rational Choice Theory as a Scientific/ Intellectual Movement in Sociology. *The American Sociologist*, *49*(1), 16–36.

Freeman, E. H., MCP, & MCT. (2007). Regulatory Compliance and the Chief Compliance Officer. *Information Systems Security*, *16*, 357–361.

Frei, C., & Muethel, M. (2017). Antecedents and Consequences of MNE Bribery: A Multilevel Review. *Journal of Management Inquiry*, *26*(4), 418–432.

Froschauer, U., & Lueger, M. (2009). Expert Interviews in Interpretive Organizational Research. In *Interviewing Experts* (pp. 217–234). London: Palgrave Macmillan UK. Retrieved from http://link.springer.com/10.1057/9780230244276_11

Fuchs, D. (2007). *Business power in global governance*. Lynne Rienner Publishers.

Gabel, J. T. A., Mansfield, N. R., & Houghton, S. M. (2009). Letter vs. Spirit: The evolution of compliance into ethics. *American Business Law Journal*, *46*(3), 453–486.

Garfinkel, H. (1967). *Studies in ethnomethodology*. Englewood Cliffs, N.J: Prentice-Hall Inc.

Garland, D. (2003). The Rise of Risk. In R. V. Ericson & Aa. Doyle (Eds.), *Risk and Morality* (p. 461). Toronto: University of Toronto Press.

George, A. L., & Bennett, A. (2005). *Case studies and theory development in the social sciences*. MIT Press.

Getz, K. A. (2006). The Effectiveness of Global Prohibition Regimes: Corruption and the Antibribery Convention. *Business & Society*, *45*(3), 254–281.

Gibbons, M. (1994). *The new production of knowledge : the dynamics of science and research in contemporary societies*. Sage.

Gibbons, M., Limoges, C., Nowotny, H., Schwartzman, S., Scott, P., & Trow, M. (2010). *The New Production of Knowledge: The Dynamics of Science and Research in Contemporary Societies* (Vol. 91). Thousand Oaks: SAGE.

Giddens, A. (1979). *Central problems in social theory : action, structure, and contradiction in social analysis*. University of California Press.

Giddens, A. (1986). *The constitution of society : outline of the theory of structuration*. University of California Press.

Gilman, S. C. (2018). To Understand and to Misunderstand How Corruption is Measured: Academic Research and the Corruption Perception Index. *Public Integrity*, *20*(sup1), S74–S88.

Goel, R. K., Budak, J., & Rajh, E. (2015). Private sector bribery and effectiveness of anti-corruption policies. *Applied Economics Letters*, *22*(10), 759–766.

Golsorskhi, D., Rouleau, L., Seidl, D., & Vaara, E. (2010). *Cambridge Handbook of Strategy as Practice*. Cambridge: Cambridge University Press.

Gond, J.-P., Kang, N., & Moon, J. (2011). The government of self-regulation: on the comparative dynamics of corporate social responsibility. *Economy and Society*, *40*(4), 640–671.

Gond, J.-P., & Piani, V. (2012). Enabling Institutional Investors' Collective Action: The Role of the Principles for Responsible Investment Initiative. *Business & Society*, *52*(1), 64–104.

Gottschalk, P. (2014). Corporate Compliance. In *Corporate Social Responsibility, Governance and Corporate Reputation*. Singapore: World Scientific Publishing Co Pte Ltd.

Granovetter, M. (1985). Economic Action and Social Structure: The Problem of Embeddedness. *American Journal of Sociology*, *91*(3), 481–510.

Gulsun Arikan, G. (2004). Fiscal Decentralization: A Remedy for Corruption? *International Tax and Public Finance*, *11*, 175–195.

Gupta, A. (1995). Blurred Boundaries: The Discourse of Corruption, the Culture of Politics, and the Imagined State. *American Ethnologist*, *22*(2), 375–402.

Gupta, A. (2005). Narrating the State of Corruption. In D. Haller & C. Shore (Eds.), *Corruption: Anthropological Perspectives*. London: Pluto Press.

Hall, R. B., & Biersteker, T. J. (Eds.). (2002). *The Emergence of Private Authority in Global Governance*. Cambridge: Cambridge University Press.

Haller, D., & Shore, C. (Eds.). (2005). *Corruption: Anthropological Perspectives*. London: Pluto Press.

Hallward-Driemeier, M. (2009). *Who Survives ? The Impact Of Corruption, Competition And Property Rights Across Firms* (Policy Research Working Papers). Washington. https://doi.org/10.1596/1813-9450-5084

Hansen, H. K. (2011). Managing corruption risks. *Review of International Political Economy*, *18*(2), 251–275.

Hansen, H. K. (2012). The power of performance indices in the global politics of anti-corruption. *Journal of International Relations and Development*, *15*(4), 506–531.

Hansen, H. K. (2017). Anti-Corruption Governance and Global Business. In A. Rasche, M. Morsing, & J. Moon (Eds.), *Corporate social responsibility - Strategy, communication, governance*. Cambridge: Cambridge University Press.

Hansen, H. K., & Tang-Jensen, M. H. (2015). Making up corruption control: Conducting due diligence in a Danish law firm. *Ephemera-Theory and Politics in Organization*, *15*(2), 365–385.

Hardy, C., & Maguire, S. (2016). Organizing risk: Discourse, power, and "riskification." *Academy of Management Review*, *41*(1), 80–108.

Harrison, E. (2006). Unpacking the Anti-corruption Agenda: Dilemmas for Anthropologists. *Oxford Development Studies*, *34*(1), 15–29.

Hauser, C. (2018). Fighting Against Corruption: Does Anti-corruption Training Make Any Difference? *Journal of Business Ethics*, *159*, 1–19.

He, Z. (2000). Corruption and anti-corruption in reform China. *Communist and Post-Communist Studies*, *33*(2), 243–270.

Held, D., McGrew, A., Goldblatt, D., & Perraton, J. (1999). *Global Transformations: Politics, Economics, and Culture*. Stanford, California: Stanford University Press.

Hindess, B. (2005). Investigating International Anti-corruption. *Third World Quarterly*, *26*(8), 1389–1398.

Hitzler, R., Honer, A., & Maeder, C. (Eds.). (1994). *Expertenwissen Die institutionalisierte Kompetenz zur Konstruktion von Wirklichkeit*. Opladen: Westdeutscher Verlag.

Holmes, L. (2015). *Corruption*. Oxford University Press.

Hook, D. (2001). Discourse, knowledge, materiality, history; Foucault and discourse analysis. *Theory and Phycology*, *11*(4), 521–547.

Horak, S., & Klein, A. (2016). Persistence of informal social networks in East Asia: Evidence from South Korea. *Asia Pacific Journal of Management*, *33*, 673–694.

Horak, S., Taube, M., Pac, A., & Manag, J. (2016). Same but different? Similarities and fundamental differences of informal social networks in China (guanxi) and Korea (yongo).

Asia Pacific Journal of Management, *33*, 595–616.

Hui, A. (2017). Variation and the intersection of practices. In A. Hui, T. Schatzki, & E. Shove (Eds.), *The Nexus of Practices: Connections, constellations, practitioners*. Oxon: Routledge.

IACC. (2018). 18th International Anti-Corruption Conference to take place 22-24 October 2018 in Copenhagen | IACC Series.

International Chamber of Commerce. (2017). *Business Integrity Compendium*. Retrieved from https://cdn.iccwbo.org/content/uploads/sites/3/2017/12/icc-business-integrity-compendium2017-web.pdf

Jakobi, A. P. (2013a). *Common Goods and Evils? The Formation of Global Crime Governance*. Oxford: Oxford University Press.

Jakobi, A. P. (2013b). The changing global norm of anti-corruption: from bad business to bad government. *Zeitschrift Fur Vergleichende Politikwissenschaft*, *7*, 243–264.

Jancsics, D. (2014). Interdisciplinary perspectives on corruption. *Sociology Compass*, *8*(4), 358–372.

Jensen, M. F. (2014). *The Question of How Denmark Got to be Denmark - Establishing Rule of Law and Fighting Corruption in the State of Denmark 1660-1900* (2014 No. 06). *Working paper*. Gothenburg.

Jetter, M., Agudelo, A. M., & Hassan, A. R. (2015). The Effect of Democracy on Corruption: Income is Key. *World Development*, *74*, 286–304.

Jongen, H. (2018). The authority of peer reviews among states in the global governance of corruption. *Review of International Political Economy*, *25*(6), 909–935.

Joutsen, M., & Graycar, A. (2012). When Experts and Diplomats Agree: Negotiating Peer Review of the UN Convention Against Corruption. *Global Governance*, *18*(4), 425–439.

Kaptein, M. (2015). The Effectiveness of Ethics Programs: The Role of Scope, Composition, and Sequence. *Journal of Business Ethics*, *132*(132), 415–431.

Key, S. (1999). Ethical Culture : Organizational Real or Imagined ? Susan Key. *Journal of Business Ethics*, *20*(3), 217–225.

Kim, D. S., Li, Y., & Tarzia, D. (2018). Value of corruption in China: Evidence from anti-corruption investigation. *Economics Letters*, *164*, 112–116.

Kimeu, S. (2014). Corruption as a challenge to global ethics: the role of Transparency International. *Journal of Global Ethics*, *10*(2), 231–237.

King, A. (2012). In Vivo Coding. In L. Given (Ed.), *The SAGE Encyclopedia of Qualitative Research Methods* (pp. 472–473). Thousand Oaks: SAGE Publications, Inc.

King, G., Keohane, R. O., & Verba, S. (1994). *Designing Social Inquiry: Scientific Inference in Qualitative Research*. New Jeresy: Princeton University Press.

Kish-Gephart, J. J., Harrison, D. A., & Treviño, L. K. (2010). Bad Apples, Bad Cases, and Bad Barrels: Meta-Analytic Evidence About Sources of Unethical Decisions at Work. *Journal of Applied Psychology*, *95*(1), 1–31.

Koehler, M. M. (2009). The Foreign Corrupt Practices Act in the Ultimate Year of Its Decade of Resurgence. *Indiana Law Review*, *43*, 389–396.

Krastev, I. (2000). The Strange (Re)Discovery of Corruption. In Lord Dahrendorf (Ed.), *The Paradoxes of Unintended Consequences*. Central European University Press.

Krastev, I. (2004). *Shifting obsessions : three essays on the politics of anticorruption*. Central European University Press.

Kvale, S. (1996). *Interviews : an introduction to qualitative research interviewing*. London: Sage Publications.

Lambsdorff, Johann Graf, & Frank, B. (2010). Bribing versus gift-giving - An experiment. *Journal of Economic Psychology*, *31*(3), 347–357.

Lambsdorff, Johann Graf, Taube, M., & Schramm, M. (Eds.). (2004). *The new institutional economics of corruption*. London and New York: Routledge.

Lambsdorff, Johann Graf, & Teksoz, S. U. (2005). Corrupt relational contracting. In Johann Graf Lambsdorff, M. Schramm, & M. Taube (Eds.), *The new institutional economics of corruption* (pp. 138–151). Abigton, Oxon: Routledge.

Lange, D. (2008). A Multidimensional Conceptualization of Organizational Corruption Control. *The Academy of Management Review*, *33*(3), 710–729.

Lapinski, M. K., & Rimal, R. N. (2005). An Explication of Social Norms. *Communication Theory*, *15*(2), 127–147.

Larmour, P. (2005). Civilizing Techniques: Transparency International and the Spread of Anti-Corruption. *Asia Pacific School of Economics and Government Discussion Papers- Policy and Governance*, 5–11.

Latour, B. (1986). The powers of association. In J. Law (Ed.), *Power, Action, and Belief: A New Sociology of Knowledge?* Routledge & Kegan Paul.

Latour, B. (1987). *Schience in Action: How to follow scientists and engineers through society*. Cambridge, MA: Harvard University Press.

Latour, B. (2005). *Reassembling the Social An Introduction to Actor-Network-Theory*. Oxford: Oxford University Press.

Lave, J., & Wenger, E. (1991). *Situated learning : legitimate peripheral participation*. Cambridge

University Press.

Law, J. (1992). Notes on the theory of the actor-network: Ordering, strategy, and heterogeneity. *Systems Practice*, *5*(4), 379–393.

Lawler, E. J., & Hipp, L. (2010). Corruption as Social Exchange. *Cornell University ILR School*, *ILR Collec*.

Lin, Y. (2004). *Between politics and markets : firms, competition, and institutional change in post-Mao China*. Cambridge: Cambridge University Press.

Lord, N. (2013). Regulating transnational corporate bribery: Anti-bribery and corruption in the UK and Germany. *Crime, Law and Social Change*, *60*(2), 127–145.

Lounsbury, M. (2008). Institutional rationality and practice variation: New directions in the institutional analysis of practice. *Accounting, Organizations and Society*, *33*(4–5), 349–361.

Lovell, D. W. (2005). Corruption as a Transitional Phenomenon: Understanding endemic corruption in post-communist states. In D. Haller & C. Shore (Eds.), *Corruption: Anthropological Perspectives*. Pluto Press.

Lukes, S. (2005). *Power: a radical view* (Second). Basingstoke, Hampshire: Palgrave Macmillan.

Lyotard, J.-F. (1984). *The postmodern condition : a report on knowledge* (Translated). Minneapolis: University of Minnesota Press.

MacLean, T. L. (2001). Thick as Thieves: A Social Embeddedness Model of Rule Breaking in Organizations. *Business and Society*, *40*(2), 167–196.

MacLennan, C. (2005). Corruption in corporate America: Enron- Before and After. In D. Haller & C. Shore (Eds.), *Corruption: Anthropological Perspectives*. London: Pluto Press.

Maguire, S., & Hardy, C. (2013). Organizing Processes and the Construction of Risk : a Discursive Approach. *Academy of Management Journal*, *56*(1), 231–255.

Mark, G. (2012). Private FCPA Enforcement. *American Business Law Journal*, *49*(3), 419–506.

Marshall, C., & Rossman, G. B. (2016). *Designing qualitative research*. Newbury Park, CA: Sage Publications, Inc.

May, C. (2006). *Global corporate power*. Lynne Rienner Publishers.

McCoy, J. L., & Heckel, H. (2001). The Emergence of a Global Anti-corruption Norm. *International Politics*, *38*, 65–90.

McGovern, P. (2016). 4 Steps for Creating a Culture of Compliance. Retrieved May 5, 2017, from http://complianceandethics.org/4-steps-creating-culture-compliance/

McHoul, A., & Wendy, G. (1993). *A Foucault Primer: Discourse, Power And The Subject*. London: Routledge.

Meuser, M., & Nagel, U. (2009). The Expert Interview and Changes in Knowledge Production. In A. Bogner, B. Littig, & W. Menz (Eds.), *Interviewing Experts* (pp. 1–42). London: Palgrave Macmillan.

Miller, G. (2014). The Compliance Function: An Overview. *New York University Law and Economics Research Paper*, *11–2014*(Paper 393), 14–36.

Misangyi, V. F., Weaver, G. R., & Elms, H. (2008). Ending Corruption: The Interplay among Institutional Logics, Resources, and Institutional Entrepreneurs. *The Academy of Management Review*, *33*(3), 750–770.

Miska, C., & Mark, M. E. (2018). Responsible Leadership: A Mapping of Extant Research and Future Directions. *Journal of Business Ethics*, *148*(148).

Montinola, G. R., & Jackman, R. W. (2002). Sources of Corruption: A Cross-Country Study. *British Journal of Political Science*, *32*(1), 147–170.

Moon, J., Crane, A., & Matten, D. (2005). Can Corporations be Citizens? Corporate Citizenship as a Metaphor for Business Particiapationn in Society. *Business Ethics Quarterly*, *15*(3), 429–453.

Moon, J., Crane, A., & Matten, D. (2006). Corporate Power and Responsibility: a Citizenship Perspective. *ROR - Revue de L´Organisation Responsable*, *1*, 82–92.

Moore, M. (2014, December 26). China fines Glaxo £297m for bribery, Mark Reilly sentenced. *The Telegraph*. Retrieved from http://www.telegraph.co.uk/finance/newsbysector/pharmaceuticalsandchemicals/11108376/China-fines-Glaxo-297m-for-bribery-Mark-Reilly-sentenced.html

Moran, J. (1999). Bribery and Corruption: the OECD Convention on Combating the Bribery of Foreign Public Officials in International Business Transactions. *Business Ethics: A European Review*, *8*(3), 141–150.

Morsing, M., & Thyssen, C. (Eds.). (2003). *Corporate values and responsibility : the case of Denmark*. Samfundslitteratur.

Nadelmann, E. A. (1990). Global Prohibition Regimes: The Evolution of Norms in International Society. *International Organization*, *44*(4), 479–526.

Neha Tudu, P., & Pathak, P. (2014). Growing Corruption Is Whistle Blowing the Answer. *Management and Labour Studies*, *39*(2), 208–218.

Neumann, I. B. (2002). Returning Practice to the Linguistic Turn: The Case of Diplomacy. *Journal of International Studies*, *31*(3), 305–8298. Retrieved from http://journals.sagepub.com/doi/pdf/10.1177/03058298020310031201

Nichols, P. M. (2012). The Business Case for Complying with Bribery Laws. *American Business Law Journal*, *49*(2), 325–368.

Nicolini, D. (2009). Articulating Practice through the Interview to the Double. *Management Learning*, *40*(2), 195–212.

Nicolini, D. (2011). Practice as the Site of Knowing: Insights from the Field of Telemedicine. *Organization Science*, *22*(3), 602–620.

Nicolini, D. (2012). *Practice theory, work, and organization : an introduction*. Oxford University Press.

Nicolini, D. (2017). Is small the only beuatiful? Making sense of "large phenomena" from a practice-based perspective. In A. Hui, T. R. Schatzki, & E. Shove (Eds.), *The Nexus of Practices Connections, constellations, practitioners*. Abingdon, Oxon OX14 4RN: Routledge.

Nicolini, D., & Monteiro, P. (2016). The Practice Approach : For a Praxeology of Organisational and Management Studies. *The SAGE Handbook of Process Organization Studies*, (October 2016), 1–27.

Nwabuzor, A. (2005). Corruption and Development: New Initiatives in Economic Openness and Strengthened Rule of Law. *Journal of Business Ethics*, *59*, 121–138.

OECD. (2014). *OECD Foreign Bribery Report: An analysis of the crime of bribery of foreign public officials*. Retrieved from https://www.oecd-ilibrary.org/docserver/9789264226616-en.pdf?expires=1523960575&id=id&accname=ocid194738&checksum=1D57EF4FAB450DB3D7C46BC93D73A4B4

OECD. (2018). *Multinational enterprises in the global economy Heavily debated but hardly measured*.

Orlikowski, W. J. (2000). Using Technology and Constituting Structures: A Practice Lens for Studying Technology in Organizations. *Organization Science*, *11*(4), 404.

Ortner, S. B. (1984). Theory in Anthropology Since the Sixties. *Comparative Studies in Society and History*, *26*(1), 126–166.

Pacini, C., Swingen, J. A., & Rogers, H. (2002). The Role of the OECD and EU Conventions in Combating Bribery of Foreign Public Officials. *Journal of Business Ethics*, *37*(4), 385–405.

Paine, L. S. (1994). Managing for organizational integrity. *Harvard Business Review*, *72*(2), 106–117.

Pantzalis, C., Chul Park, J., & Sutton, N. (2008). Corruption and valuation of multinational corporations. *Journal of Empirical Finance*, *15*, 387–417.

Pantzar, M., & Shove, E. (2010). Understanding innovation in practice: a discussion of the production and re-production of Nordic Walking. *Technology Analysis & Strategic Management*, *22*(4), 447–461.

Parliament of the United Kingdom. Bribery Act 2010 (2010). Parliament of the United Kingdom. Retrieved from http://www.legislation.gov.uk/ukpga/2010/23/pdfs/ukpga_20100023_en.pdf

Pasricha, P., Singh, B., & Verma, P. (2017). Ethical Leadership, Organic Organizational Cultures and Corporate Social Responsibility: An Empirical Study in Social Enterprises, 1–18.

Paunov, C. (2016). Corruption's asymmetric impacts on firm innovation. *Journal of Development Economics*, *118*, 216–231.

Pechlivanos, L. (2005). Self-enforcing corruption: information transmission and organizational response. In Johann Graf Lambsdorff, M. Taube, & M. Scramm (Eds.), *The new institutional economics of corruption* (pp. 93–111). Abigton, Oxon: Routledge.

Pfarrer, M. D., Decelles, K. A., Smith, K. G., & Taylor, M. S. (2008). After the Fall: Reintegrating the Corrupt Organization. *Academy of Management Review*, *33*(3), 730–749.

Pinto, J., Leana, C. R., & Pil, F. K. (2008). Corrupt organizations or organizations of corrupt individuals? two types of organization-level corruption. *Academy of Management Review*, *33*(3), 685–709.

Pouliot, V. (2013). Methodology-Putting practice theory into practice. In R. Adler-Nissen (Ed.), *Bourdieu in International Relations Rethinking key concepts in IR*. Abingdon, Oxon: Routledge.

Pouliot, V., & Thérien, J. P. (2017). Global Governance in Practice. *Global Policy*, *9*(2), 163–172.

Power, M. (2007). *Organizing Uncertainty: Designing a world of risk management*. Oxford: Oxford University Press.

Rabinow, P., & Sullivan, W. M. (Eds.). (1979). *Interpretive Social Science : A Reader* (1st ed.). Berkeley: University of California Press.

Reckwitz, A. (2002a). The Status of the "Material" in Theories of Culture: From "Social Structure" to "Artefacts." *Journal for the Theory of Social Behaviour*, *32*(2), 195–217.

Reckwitz, A. (2002b). Toward a Theory of Social Practices A Development in Culturalist Theorizing. *European Journal of Social Theory*, *5*(2), 243–263.

Riles, A. (1999). Models and Documents: Artifacts of International Legal Knowledge. *International and Comparative Law Quarterly*, *48*(04), 805–825.

Riles, A. (Ed.). (2006). *Documents: Artifacts of Modern Knowledge*. Ann Arbor: The University of Michigan Press.

Rodriguez, P., Siegel, D. S., Hillman, A., & Eden, L. (2006). Three Lenses on the Multinational Enterprise: Politics, Corruption, and Corporate Social. *Source Journal of International Business Studies*, *37*, 733–746.

Rorty, R. M. (Ed.). (1967). *The Linguistic Turn: Essays in Philosophical Method*. Chicago and London: The University of Chicago Press.

Rose-Ackerman, S. (1975). The economics of corruption. *Journal of Public Economics*, *4*, 187–

203.

Rose-Ackerman, S. (1986). Reforming Public Bureaucracy through Economic Incentives? *Economics, & Organization*, *2*(1), 131–161.

Rose-Ackerman, S. (1997). *The Role of the World Bank in Controlling Corruption*.

Rose-Ackerman, S. (1999). *Corruption and government : causes, consequences, and reform*. Cambridge: Cambridge University Press.

Rose, C. (2012). The UK Bribery Act and accompanying guidance: Belated implementation of the OECD Anti-bribery Convention. *The International and Comparative Law Quarterly*, *61*(2), 485–499.

Rose, C. (2015). *International anti-corruption norms: their creation and influence on domestic legal systems*. Oxford: Oxford University Press.

Rose, N., & Miller, P. (2010). Political power beyond the State: Problematics of government. *British Journal of Sociology*, *61*(SUPPL. 1), 271–303.

Rosenau, J. N., & Czempiel, E. O. (1992). *Governance without government : order and change in world politics*. Cambridge University Press.

Rotondi, V., & Stanca, L. (2015). The effect of particularism on corruption: Theory and empirical evidence. *Journal of Economic Psychology*, *51*, 219–235.

Russell, H., & Bernard, R. (2011). *Research methods in Anthropology:Qualitative and Quantitative Approaches* (Fifth). New York: AltaMira Press.

Ryvkin, D., & Serra, D. (2018). Corruption and competition among bureaucrats: An experimental study. *Journal of Economic Behavior and Organization*, (2017), 1–13.

Saldana, J. (2009). *The Coding Manual for Qualitative Researchers* (1st ed.). London: SAGE Publications.

Salimbene, F. P. (1999). The OAS and the OECD Move against Transnational Bribery: Implications for U.S. Businesses and the Foreign Corrupt Practices Act. *Business and Society Review*, *104*(1), 91–105.

Sampath, V. S., Gardberg, N. A., & Rahman, N. (2018). Corporate Reputation's Invisible Hand: Bribery, Rational Choice, and Market Penalties. *Journal of Business Ethics*, *151*(3), 743–760.

Sampson, S. (2010). The anti-corruption industry: From movement to institution. *Global Crime*, *11*(2), 261–278.

Sampson, S. (2015). The anti-corruption package∗. *Ephemera-Theory and Politics in Organization*, *15*(2), 435–443.

Sampson, S. (2016). The "Right Way": Moral Capitalism and the Emergence of the Corporate

Ethics and Compliance Officer. *Journal of Business Anthropology*, (Special Issue 3), 65–86.

Sampson, S. (2017). Anti-corruption: Who cares? In S. Arvidsson (Ed.), *Challenges in Managing Sustainable Business : Reporting, Taxation, Ethics and Governance* (pp. 277–294). Palgrave Macmillan.

Schatzki, T. (2015). Spaces of Practices and of Large Social Phenomena. *Revue Indisciplinaire de Sciences Sociales*.

Schatzki, T., Cetina, K. K., & Savigny, von E. (Eds.). (2001). *The Practice Turn in Contemporary Theory*. London: Routledge.

Schatzki, T. R. (1996). *Social Practices: A Wittgensteinian Approach to Human Activity and the Social*. *J*. Cambridge: Cambridge University Press.

Schatzki, T. R. (2001). Practice mind-ed orders. In T. R. Schatzki, K. Knorr-Cetina, & E. von Savigny (Eds.), *The practice turn in contemporary theory*. Oxon: Routledge.

Schatzki, T. R. (2002). *The site of the social: a philosophical account of the constitution of social life and change*. Pensylvania: The Pensylvania State University Press.

Schatzki, T. R. (2005). The Sites of Organizations. *Organization Studies*, *3*(26), 465–484.

Schatzki, T. R. (2010). *The Time Space of Human Activity: On Performance, Society, and History as Indeterminate Teleological Events*. Lanham: Lexington Books.

Schatzki, T. R. (2011). *Where the Action Is (On Large Social Phenomena Such as Sociotechnical Regimes)* (Sustainable Practices Research Group).

Scherer, A. G. (2016). Managing for Political Corporate Social Responsibility – New Challenges and Directions for PCSR 2 . 0, (May), 1–39.

Scherer, A. G., & Palazzo, G. (2011). The New Political Role of Business in a Globalized World: A Review of a New Perspective on CSR and its Implications for the Firm, Governance, and Democracy. *Journal of Management Studies*, *48*(4), 899–931.

Scherer, A. G., Rasche, A., Palazzo, G., & Spicer, A. (2016). Managing for Political Corporate Social Responsibility: New Challenges and Directions for PCSR 2.0. *Journal of Management Studies*, *53*(3), 273–298.

Schmidt, R. S. (2006). Value-Critical Policy Analysis The Case of Language Policy in the United States. In D. Yanow & P. Schwartz-shea (Eds.), *Interpretation and Method Empirical Research Methods and the Interpretive Turn*. Armonk, New York: M.E. Sharpe.

Schwartz-shea, P., & Yanow, D. (2012). *Interpretive Research Design: Concepts and Processess*. New York and London: Routledge.

Schwartz-Shea, P., & Yanow, D. (2012). The Rhythms of Interpretive Research II: Understanding and Generating Evidence. In *Interpretive Research Design: Concepts and Processess*

(Routledge). New York: Routledge.

Schwartz, M. S. (2013). Developing and sustaining an ethical corporate culture: The core elements. *Business Horizons*, *56*(1), 39–50.

Sell, S. K. (1999). Multinational Corporations as Agents of Change : the Globalization of Intellectual Property Rights. In C. Cutler, V. Haufler, & T. Porter (Eds.), *Private authority and international affairs*. Albany NY: State University of New York Press.

Shaw, M. (2000). Historical sociology and global transformation. In R. Palan (Ed.), *Global Political Economy: Contemporary Theories*. Abigton, Oxon: Routledge.

Shleifer, A., & Vishny, R. W. (1993). Corruption. *The Quarterly Journal of Economics*, *108*(3), 599–617.

Shore, C., & Haller, D. (2005). Sharp Practice: Anthropology and the Study of Corruption. In D. Haller & C. Shore (Eds.), *Corruption: Anthropological Perspectives*. London: Pluto Press.

Shove, E., & Pantzar, M. (2005). Consumers, Producers and Practices. *Journal of Consumer Culture*, *5*(1), 43–64.

Sims, R. R. (2000). Changing an Organization ' s Culture Under New Leadership. *Journal of Business Ethics*, *25*(May), 65–78.

Slager, R. (2017). The Discursive Construction of Corruption Risk. *Journal of Management Inquiry*, *26*(4), 366–382.

Smith, D. J. (2007). *A culture of corruption : everyday deception and popular discontent in Nigeria*. Princeton and Oxford: Princeton University Press.

Sousa, L. de, Larmour, P., & Hindess, B. (2009). *Governments, NGOs and anti-corruption : the new integrity warriors*. London: Routledge/ECPR Studies.

Spicer, A. (2009). The normalization of corrupt business practices: Implications for integrative social contracts theory (ISCT). *Journal of Business Ethics*, *88*(SUPPL. 4), 833–840.

Spicer, A., McDermott, G. A., & Kogut, B. (2000). Entrepreneurship and Privatization in Central Europe: The Tenuous Balance Between Destruction and Creation. *Academy of Management Review*, *25*(3), 630–649.

Strange, S. (1988). *States and markets*. London: Pinter Publishers.

Strauss, A. L. (1987). *Qualitative analysis for social scientists*. *Qualitative analysis for social scientists*. Cambridge: University of Cambridge.

Sung, H.-E. (2003). Fairer Sex or Fairer System? Gender and Corruption Revisited" *Social Forces*, *82*(2).

T.I. (2019). Our Organisation - Mission, vision and values. Retrieved April 29, 2019, from

https://www.transparency.org/whoweare/organisation/mission_vision_and_values/0

Tanzi, V. (1998). Corruption around the world: Causes, Consequences, Scope, and Cures. *IMF Working Paper*. Retrieved from https://www.imf.org/external/pubs/ft/wp/wp9863.pdf

Taylor, C. (1979). Interpretation and the sciences of men. In P. Rabinow & W. M. Sullivan (Eds.), *Interpretive social science: A reader* (1st ed.). Berkeley: University of California Press.

Taylor, C. (1995). *Philosophical Arguments*. Cambridge: Harvard University Press.

The Washington Post. (2018). China's anti-corruption drive also powerful political tool for President Xi. Retrieved from https://www.washingtonpost.com/world/asia_pacific/in-china-investigations-and-purges-become-the-new-normal/2018/10/21/077fa736-d39c-11e8-a275-81c671a50422_story.html?noredirect=on&utm_term=.80eea581ff50

Thomson Reuters. (2016). *A Culture of Compliance: How Compliance Can Affect Corporate Culture for the Better*. Retrieved from https://risk.thomsonreuters.com/content/dam/openweb/documents/pdf/risk/white-paper/a-culture-of-compliance-white-paper.pdf

Torsello, D., & Venard, B. (2016). The Anthropology of Corruption. *Journal of Management Inquiry*, *25*(1), 34–54.

Transparency International. (2011). Bribe Payers Index -- 2011. Retrieved from http://www.transparency.org/bpi2011

Transparency International. (2017). What is Corruption? Retrieved May 9, 2017, from http://www.transparency.org/what-is-corruption/#define

Treisman, D. (2000). The causes of corruption: a cross-national study. *Journal of Public Economics*, *76*, 399–457.

Trevino, L. K., & Youngblood, S. A. (1990). Bad Apples in Bad Barrels: A Causal Analysis of Ethical Decision-Making Behavior. *Journal of Applied Psychology*, *75*(4), 378–385.

Trinczek, R. (2009). How to Interview Managers? Methical and Methodological Aspects of Expert Interviews as a Qualitative Method in Empirical Social Research. In *Interviewing Experts* (pp. 203–216). London: Palgrave Macmillan UK.

Tsingou, E. (2018). New governors on the block: the rise of anti-money laundering professionals. *Crime, Law and Social Change*, *69*(2), 191–205.

Tullock, G. (1996). Corruption theory and practice. *Contemporary Economic Policy*, *14*, 6–13.

UN Global Compact. (2006). Business against corruption. Retrieved from https://www.unglobalcompact.org/library/162

United Nations Global Compact. (2011). *Business against Corruption: A Framework for Action*.

Uslaner, E. M. (2005). Trust and corruption. In Johann Graf' Lambsdorff, M. Taube, & M. Schramm (Eds.), *The new institutional economics of corruption* (pp. 76–92). Abigton, Oxon: Routledge.

Van Maanen, J. (1995). Style As Theory. *Organization Science*, *6*(1 (Focused Issue: European Perspective on Organization Theory)), 133–143.

Verhezen, P. (2010). Giving Voice in a Culture of Silence. From a Culture of Compliance to a Culture of Integrity. *Journal of Business Ethics*, *96*(2), 187–206.

Verma, P., Mohapatra, S., & Löwstedt, J. (2016). Ethics Training in the Indian IT Sector: Formal, Informal or Both? *Journal of Business Ethics*, *133*, 73–93.

Voegtlin, C., & Pless, N. M. (2014). Global Governance: CSR and the Role of the UN Global Compact. *Journal of Business Ethics*, *122*(2), 179–191.

Volcker, P. A., Goldstone, R. J., & Pieth, M. (2005). *Manipulation of the Oil-for-food Programme by the Iraqi regime*. Retrieved from www.iic-offp.org

Walters, W. (2008). Anti-policy and anti-politics: Critical reflections on certain schemes to govern bad things. *European Journal of Cultural Studies*, *11*(3), 267–288.

Wang, H., & Rosenau, J. N. (2001). Transparency International as an Issue of Global Governance. *Global Governance*, *7*(1), 25–49.

Watson, M. (2017). Placing power in practice theory. In A. Hui, T. Schatzki, & E. Shove (Eds.), *The nexus of practices: Connections, constellations, practitioners*. Abigton, Oxon: Routledge.

Weismann, M. F. (2009). The Foreign Corrupt Practices Act: The Failure of the Self-Regulatory Model of Corporate Governance in the Global Business Environment. *Journal of Business Ethics*, *88*, 615–661.

Weismann, M. F., Buscaglia, C. A., & Peterson, J. (2014). The Foreign Corrupt Practices Act: Why It Fails to Deter Bribery as a Global Market Entry Strategy. *Journal of Business Ethics*, *123*, 591–619.

Welch, D., & Warde, A. (2017). How Should We Understand 'General Understandings'? In A. Hui, T. Schatzki, & E. Shove (Eds.), *The Nexus of Practices Connections, constellations, practitioners* (1st ed.). New York: Routledge.

Wesberry, J. P. (1997). International Financial Institutions Face the Corruption Eruption: If the IFIs put Their Muscle and Money Where Their Mouth is, the Corruption Eruption May be Capped. *Northwestern Journal of International Law & Business*, *18*(2).

Whittington, R. (2006). Completing the Practice Turn in Strategy Research. *Organization Studies*, *27*(5), 613–634.

Whittle, A., & Spicer, A. (2008). Is Actor Network Theory Critique? *Organization Studies*, *29*(04).

Williams, R. (1999). New concepts for old? *Third World Quarterly*, *20*(3), 503–513.

World Bank. (2017). Denmark | Trade At a glance | Most Recent Value | WITS | Data. Retrieved January 18, 2019, from https://wits.worldbank.org/CountrySnapshot/en/DNK

Wrage, S., & Wrage, A. (2005). Multinational enterprises as "moral entrepreneurs" in a global prohibition regime against corruption. *International Studies Perspectives*, *6*(3), 316–324.

Yang, M. M. (1994). *Gifts, favors, and banquets : the art of social relationships in China*. Cornell University Press.

Yanow, D., & Schwartz-shea, P. (Eds.). (2007). *Interpretation and method: Empirical Research Methods and the Interpretive Turn*. Armonk, New York: M.E. Sharpe.

Yeoh, P. (2012). Bribery Act 2010: implications for regulated firms. *Journal of Financial Regulation and Compliance*, *20*(3), 264–277.

Young, R. J. C. (2001). *Postcolonialism: An Historical Introduction*. Malden: Blackwell Publishing.

Zyglidopoulos, S. (2016). Toward a Theory of Second-Order Corruption. *Journal of Management Inquiry*, *25*(1), 3–10.

Zyglidopoulos, S. C., Fleming, P. J., & Rothenberg, S. (2008). Rationalization, Overcompensation and the Escalation of Corruption in Organizations. *Journal of Business Ethics*, *84*, 65–73.

Zyglidopoulos, S., Hirsch, P., de Holan, P. M., & Phillips, N. (2017). Expanding Research on Corporate Corruption, Management, and Organizations. *Journal of Management Inquiry*, *26*(3), 247–253.

Appendixes

Appendix 1- Development of interview protocols

Topic: Corporate anti-corruption and compliance in global governance from a practice based approach: Focus on experts rather than the company.

Anonymity: Yes

Confidentiality agreement: Yes

Recorded: Yes

Withdrawal: At any time before, during, or after the interview.

Round 1:

1) Can you describe or define anti-corruption in your own words?
2) Do you see corporate anti-corruption as part of the broader CSR agenda?
3) Who or what are the main drivers behind the recent turn towards compliance in the private sector?
4) Based on your experience, can you describe to me how Danish companies feel about/responded to the need to implement anti-corruption?
5) Who or what would you say are the main actors shaping the anti-corruption agenda?
6) Can you talk to me about private to private or private to public cooperation against corruption?
7) How do companies control compliance abroad and in particular China? Established department there?
8) What are the obstacles when implementing anti-corruption/compliance measures in China?
    a. Third party management
    b. Training
9) By what standards CoCs are being designed and drafted?
10) What is the objective the company tries to accomplish through the COC?
11) What capacities do you want to strengthen to your employees with training?
    a. In house or external private consultancies?
12) What capacities do you expect to find out when you perform due diligence?

Round 2:

1) How would you describe corporate anti-corruption?

    a. Ethical-legal
2) What are the drivers behind the recent turn of Danish companies towards anti-corruption?
3) In your experience, how did Danish companies respond to the need to develop anti-corruption?
    a. Current status-different sectors.
4) Can you talk to me about the relationship between anti-corruption and CSR?
    a. Danish context, Chinese context, American context.
5) Can you tell me about private to private and private to public cooperation on anti-corruption?
    a. Danish context, abroad.
6) In your experience, how do companies manage anti-corruption abroad and in particular China?
    a. Establish departments there? From headquarters?
    b. Use of law firms and consultancies.
    c. Challenges?
7) By what standards CoCs are being designed and drafted?
    a. Ethical, legal, competitiveness, isomorphism.
8) Can you talk to me about the training of employees on anti-corruption?
    a. Ethical, legal, operational, culturally based, in-house or external actors? Ask for a description of the training program. An example maybe?
9) Can you talk to me about performing due diligence on third parties?
    a. Ethical, legal, operational, culturally based, in-house or external actors? Ask for a description of due diligence. An example maybe?
10) Question on FCPA and UK Bribery act compared to national legislation. How these two interplay, why companies choose to draft the CoC based on FCPA and Bribery act? How do they see national legislation?
11) Anything else you would like to add?

Round 3:

Question 1: What does corporate compliance/anti-corruption mean for you?

- Why do you think anti-corruption/compliance has attracted so much attention lately?

Question 2: Can you describe to me the organization of your department and your main tasks and responsibilities as a compliance officer?

Grand Question 3: (Interview to the double method-Focus on practice.)

    a. <u>Follow up questions</u> when the interviewee starts talking about an activity of interest.

For example: You said you check your daily tasks. What tasks are these?

Looking for practical info on activities such as risk assessment, training, due-diligence, code of conduct.

    b. Prompting to elaborate on these tasks/activities.

<u>Possible prompts</u>:

    a. What tools do you use when performing activity X?
    b. By what standards do you design activity X?
    c. Who gets involved in designing/performing activity X?
    d. What do you aim to accomplish with activity X?
    e. Why do you think activity X is important?
    f. Where do you get inspiration when performing activity X?
    g. How do you deal with cultural differences when performing activity X?
    h. Given the large size of any MNC, how do you choose who is to be trained/checked/monitored?

Grand question 4: Can you describe to me the role of the compliance department within any company?

<u>Possible prompts</u>:

    a. What qualities are necessary for compliance officers to perform their tasks?
    b. What connections are necessary to fulfill the objective?
    c. To whom the department is accountable?
    d. What in your opinion is the optimal positioning of the compliance department within a company in order to be effective?
    e. What challenges are likely to be faced when performing compliance activities?

Question 5: How do you think compliance changes a company internally and externally?

  a. Intra-organizationally. What was going on before?
  b. In relation to governments. What was going on before?
  c. In relation to other companies. What was going on before?

Question 6 (Cooling off): How do you think corporate compliance/anti-corruption will look like in ten years' time?

Anything else you would like to add?

Before you go:

  a. Any contacts especially in China
  b. Any documents to look into (anonymously)
  c. Any chance to look into what software or tools they are using (anonymously)?

Appendix 2: Example of thematic analysis of interview

Natural Unit	Central Theme	Comments
1. Well as we just briefly talked about, the anti-corruption effort is closely linked or has been for many years closely linked to the CSR area because I think it was eeh kick started eeh..that link to CSR was kick started by the UN Global Compact eem and was also one of the kind of the first areas that companies took upon them to be compliant with the anti-corruption…and basically, for the companies it's about doing clean business. And nobody really in Denmark and in large part of the world especially in the western world, eee nobody accepts corruption. It's something that we see as an evil.	Anti-corruption closely linked to CSR and Danish/Western culture. It is about doing clean business.	Anti-corruption governance A mostly western concept that turned into global through the involvement of the UN. For some reason companies have to do clean business…
2. But at the same time corporations are looking into globalization and want to become multinational companies operating in remote areas of the world from their headquarters is and they have to realize that there is a different culture. That there is a different way of thinking about corruption because if it was only in Denmark eeeh practically I guess no companies in Denmark would have an anti-corruption compliance program because it is so much closely built into the Danish culture. But due to the fact that we are an export country then we need to live in an export world. We have to be aware of that and we have to take that responsibility as a global company.	Global companies have to take the responsibility that they have to be out there to areas where other cultures apply.	Corporate behavior If you want to be global you also take certain responsibilities such as deal with different cultures. If it is not possible to change them then you must protect your own interest. This whole AC movement then brings a framework that more or less serves western interests. Responsibility to whom? To yourself? To your own principles? To your own interests? Or to a global interest and development?
3. Well this is interesting because eem my perspective to anti-	A systematic way to promote rules and if	Maybe it is not the rules that are new but the

corruption is very much from..what I would call the hard side of compliance is where you describe some policies, your rules and policies, you communicate these in a systematic way and you train your people so that they read and understand and they kind of accept to live by the rules, and then you follow up on the rules and if people violate the rules you take the consequences of that. That has very much to do about the behavior and the culture of your employees and organization that you are working in.	people don't do so there is price to be paid.	systematic enforcement. As the subject says, there were always rules on corruption, what is then new is that western actors suddenly were activated on that matter. Why is that? What caused that change? What makes actors be interested in a matter that was always there? The west is known for the systematic way of approaching issues and challenges, and therefore what is being enforced here is the western way of doing things. Not necessarily corruption which has always been there but rather a specific way of dealing with corruption. That goes back to risk and how the west handles and utilizes risk as a means to achieve goals. Theme maybe?
4. But this approach is in my view somewhat new because if we look back in history the approach to anti-corruption and other responsibility areas was more kind of like 'embrace our every responsibility, we accept that the organization has a responsibility. If you go back into the original thinking of shareholder management for example in the U.S eeem you will not find a kind of any responsibility in this direction because we only had one responsibility towards the shareholders. But as stakeholder	Anti-corruption became a corporate responsibility as stakeholder management took over from shareholder.	Anti-corruption governance Why stakeholders care about corruption? Why such expectations from companies? And why companies took that responsibility. If we look above then it might be a way of establishing a certain way of doing things and very compatible with western standards.

	management and stakeholder relationship was kind of…has been adopted over the years and more predominantly in Europe than in the U.S. eem we have take a stand on a lot of different areas, corruption being one of them. So I think that..when I say it comes out of that agenda is because organization kind of adopted various corporate responsibility areas overtime and anti-corruption was one of them.		
5.	Yes I agree with you it is a bit different when we talk about anti-corruption because it is more eemmm we see that is something that we need to embed in the business processes a lot more…it's all about people. Anti-corruption is all about people. Although I would argue that the same goes with environment to some extent because if we talk about surplus material from the production or waste water, we can have a policy and we can have some instructions and guidelines saying that this has to be deposited to cleaning and whatever but if people don't follow those rules they can be polluting the local river, they can be polluting the ground where we are operating. So it still comes down to people. This organism of the company is still a bunch of people getting together and their behavior collectively is the behavior of the company.	Anti-corruption is all about the people. This is its main difference from other CSR areas.	Continuing…thus this is about changing individual behavior or actor behavior. First standard rules change and then norms. It might be the other way in western areas like norms shape laws but in non-western areas hard regulation works better.

Appendix 3: Field notes example

1) Hand notes - Compliance training session	Central theme	Comments
Right after the main instructor took the floor and gave a short presentation of the past, current, and upcoming regulations, public, voluntary, and intergovernmental, that shape and are expected to shape the field of compliance. She moves much more than her colleagues and other presenters and seems excited to be doing this. She mentioned that the new project Fight against facilitation payments (FAFPI) is finally underway. Fafpi is an idea firstly articulated by (…) of (…) and refers to a public-private initiative to counter facilitation payments. In particular, fafpi will be a forum for companies to share knowledge and experience, and a data-base developed by public and private actors and in which all sorts of actors will be able to input information about the amounts, places, and people they have paid facilitation payments to. It aims to the gathering of data about places and people who are likely to request facilitation payments. The objective is to not only allow companies to know which places are the most corrupt prone but also to allow the government to use that data to lobby foreign governments to do something about that issue.	Anti-corruption regulatory framework. FAFPI-Public-private initiative	Maybe it shouldn't be a surprise but from where I stand now, anti-corruption seems to be a super-important aim for corporations. This is probably confirmed by the amount of regulations out there which seems overwhelming. Nevertheless, I find the FAFPI initiative in line with the above comment and most importantly a very good way to counter facilitation payments. I find it also very interesting to see in practice how governments are drawn into the solution. Two more comments here, first the passage confirms the argumentation of the blurred boundaries between public and private actors. Second, and to some extent opposing the first comment, blurred boundaries don't mean replacing public with private authorities. Rather it seems to me that partnerships are more realistic phenomenon

2) Hand written notes from participation in the ISO 37001 Anti-bribery Management system Summit, Shenzhen November 13th 2017	Central theme	Comments
With regards to the Questions and Answers session there was a lot of discussion about the personal element in corruption and how to deal with that. The answer was that in this case what is needed is education and training on anti-corruption and in the short-term preventive measures are required. I would add to that disciplinary measures are also necessary to counter corrupt behaviors. The compliance director of one of the largest IT companies challenged the tone from the top approach by saying that the tone from the middle is also more important since it is middle managers who sometimes push the lower levels of a company towards corruption by requesting unrealistic targets. The answer was that there is an increase in focus on training middle managers along with the other levels of the company because they too need to understand the risk of corruption. The tone from the top helps in this direction.	Corruption as a personal choice and counter measures Tone from the middle managers important	I am not surprised…how else can one curb corruption in an organization. Since corruption has to do with human behavior then training and disciplinary measures should suffice. On the other hand however, is that the only thing we can do to curb corruption? Laws and measures have always been present and failed most of the time. After all these years of discussion and preparation for the new ISO 37001 the best they can offer is what has been already known? What is the point on having an ISO 37001 certification then? Excellent point raised here. Is the tone from the top enough? In a discussion I had with a compliance officer he mentioned something similar regarding corruption and anti-corruption in China. However it relates with the above comment. Training is the only thing we can do? And if so who is to train managers. Who has such knowledge and expertise to train managers?

Appendix 4: Indicative confidentiality agreement

UNILATERAL NON-DISCLOSURE AGREEMENT

This Unilateral Non Disclosure Agreement (the "Agreement") is entered into by and between

Anestis Keremis
Doctoral Researcher
Tel.: +45 50294082
ake.dbp@cbs.dk

Department of Business and Politics
COPENHAGEN BUSINESS SCHOOL
Porcelænshaven 1, office PH 2.14
2000 Frederiksberg
Denmark

(hereinafter called "Consultant")

and

(hereinafter called   )

Whereas   possess valuable, confidential information, as defined below, related to its respective businesses and wish to share this confidential information with Consultant during an interview in relation to PhD study aiming to the investigation of Multinational Corporations (MNC) as socio-political actors in the global system (hereinafter defined as "Project").

Whereas   The confidential information may be used anonymously by the Consultant only for the purpose of the Project.

NOW THEREFORE, for the purpose of preventing the unauthorized disclosure and use of confidential information, the Parties agree as follows:

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1 DEFINITION OF CONFIDENTIAL INFORMATION

1.1 "Confidential Information" shall mean all or any portion of information, materials or ideas in whatever form, tangible or intangible (written, oral, photographic, electronic, magnetic or otherwise), including without limitation, all actual or anticipated business records and plans, financial information, customer or vendor records and lists, pricing, sales, operations and technical information and products, business techniques and methodologies, designs and specifications, data models, ideas, inventions, research, know-how, processes, algorithms, formulas, proposals, trading, hedging, marketing or sales information or techniques, agreements with third parties (whether in negotiation or executed, announced or unannounced), any other proprietary information and all associated data and analyses of any of the foregoing, regardless of whether such information is marked "Confidential Information" at the time of its disclosure, its form or embodiment or the manner in which the disclosure is made.

2 OBLIGATIONS OF THE CONSULTANT

2.1 The Consultant undertakes:

2.1.1 to keep and treat all Confidential Information disclosed by or on behalf of t   strictly Confidential;

2.1.2 to protect such Confidential Information from inadvertent disclosure to a third party using the same care and diligence that the Consultant uses to protect its own proprietary and confidential information, but in no case less than reasonable care;

2.1.3 to disclose the Confidential Information disclosed by or on behalf of   only to those of Consultant's employees who need to know such information for the purpose of the Project and who agree to keep such information in full compliance with this Agreement;

2.1.4 to refrain from disclosing any Confidential Information disclosed by or on behalf of   to any third party unless written consent from Grundfos is first obtained;

2.1.5 to only use the Confidential Information disclosed by or on behalf of   solely for the Project;

2.1.6 to comply with the applicable data privacy rules if the Confidential Information contains personal data.

3 EXCEPTIONS FROM CONFIDENTIAL INFORMATION

3.1 Notwithstanding the provisions of Section 2 above, the Consultant shall not be required to maintain confidentiality or be restricted in its use of any Confidential Information that the Consultant can prove beyond reasonable doubt:

3.1.1 was publicly known at the time of disclosure;

3.1.2 becomes publicly known after the Effective Date through no wrongful act or omission of the Consultant;

3.1.3 was in the Consultant's possession prior to disclosure by Grundfos;

3.1.4 has been rightfully received from a third party without restrictions on disclosure and without breach of this Agreement;

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3.1.5 has been independently developed by the Consultant's employees who have had no contact with the Confidential Information and without reference to any Confidential Information of·

3.1.6 has been approved for release by written authorization of

3.1.7 shall be disclosed pursuant to a requirement of a governmental agency or of law, provided however, that, to the extent viable under the circumstances, the Consultant has notified   in advance of such disclosure and   has had an opportunity to seek a protective order or other appropriate remedy and the Consultant has reasonably cooperated with such efforts; and provided further, however, that the Consultant furnish only that portion of the Confidential Information that is legally required to be so disclosed.

4   TERM

4.1   The Confidential Information shall as a general rule, be treated as confidential for a period of ten (10) years running from the day where the parties agree that the Project shall be deemed ended and/or completed.

5   RETURN OF MATERIAL

5.1   Confidential Information shall be deemed to be the property of   and the Consultant shall, upon receipt of a written request from Grundfos, return within (fourteen) 14 calendar days to   all such Confidential Information that is maintained in tangible form as well as all information derived therefrom and destroy all such information maintained in electronic or other intangible media, hereunder completely delete all the files and parts of files containing Confidential Information, on all IT systems and drives of the Consultant together with all copies or extracts thereof. Notwithstanding the above will the Consultant be allowed to keep one copy of the Confidential Information to be used in case of a dispute arising out of this Agreement.

6   CHOICE OF LAW AND VENUE

6.1   This Agreement, shall be governed by, and construed in accordance with, the laws of Denmark.

6.2   Any dispute or claim arising out of or in connection with this Agreement, or the breach, termination or invalidity thereof which the Parties have been unable to settle amicably shall provided that section 10.3 below is not applicable be settled by arbitration in accordance with the Rules of Procedure of the International Chamber of Commerce International Court of Arbitration (ICC Arbitration) and the International Bar Association Rules on Taking Evidence in International Commercial Arbitration. The arbitration tribunal shall be composed of 3 arbitrators. ICC Arbitration in accordance with the said Rules shall appoint all members of the arbitration tribunal. The place of arbitration shall be Copenhagen. The language of the arbitration shall be English.

6.3   shall at its sole discretion be entitled to apply for injunction at the venue of the Consultant in accordance with the laws in Consultant's country to restrain the Consultant from disclosing (in whole or in part) the Confidential Information.

3

7   COUNTERPARTS

7.1   This Agreement will be executed in two counterparts and all counterparts shall constitute an original, and all counterparts shall together constitute one and the same instrument.

On behalf of the Project/CBS
Copenhagen
Date:

_____
Anestis Keremis

Doctoral Researcher

Copenhagen

Date:

9 - 8 - 2017

On behalf of

Date:

_____
Head of Legal IPR, Lit. and Compliance

Date: 04.08.2017

4

Paper 1: Translating corporate anti-corruption: How ethics are integrated into business

ABSTRACT

This paper examines how anti-corruption is integrated into ethics in multinational companies (MNC) and by what means. Inspired by Actor-network theory, I utilize the concept of translation to follow and understand the work of anti-corruption and compliance experts in corporations. I found that compliance and anti-corruption experts make use of three strategies by which they integrate ethics into business practices. The first strategy is *enrollment* of other actors in the overall project of anti-corruption by the alignment of diverse interests. The second, *interessement*, refers to the interference of compliance and anti-corruption professionals with standard business practices in an effort to re-direct them towards anti-corruption. And the third, *problematization*, refers to the overall translation of corruption risks into compliance. Seen from a distance, these three strategies shed light on a process by which 1) business practices turn into risks; 2) risks bring forth expectations of responsibility in the form of anti-corruption; 3) anti-corruption is translated once again into compliance; a much narrower and thus more manageable problem than corruption itself since it is restricted to the corporation and its own rules. Such findings imply that the sociopolitical role of corporations is not just to be found in the external behavioral observation of multinational companies but also in their internal operation.

1. Introduction

The engagement of the private sector and in particular of multinational companies (MNC) in issues such as corruption has drawn significant attention globally during the last decades. Corruption in organizations has been associated with bribery, the act of 'offering, paying or receiving a bribe through an officer, employee, subsidiary, intermediary or any third party (individual or corporate) acting on the commercial organization's behalf' (Kenyon, 2013, p. 6). Indeed, the vast amount of transactions MNCs they perform daily, their expansion worldwide, their economic power and influence can be as advantageous as disadvantageous in the matter of corruption (Heineman, 2009; Wrage & Wrage, 2005).

The traditional view of the relationship between MNCs and corruption sees the former as breeders of corruption. As a result strict governmental regulation is being favored as the leash that will control the seemingly uncontrollable corporate tendency towards corruption (Andreas & Nadelmann, 2006; Cragg & Woof, 2002; Gabel et al., 2009; Getz, 2006; Lord, 2013; Mark, 2012; Nadelmann, 1990; Weismann, 2009; Yeoh, 2012). Another emergent line of thought highlights a 'bright' side of MNCs as socio-political actors (Crane et al., 2008) and potentially allies against corruption (Calderón et al., 2009; Wrage & Wrage, 2005); taking departure from studies on the rising corporate power and private authority (Fuchs, 2007; Hall & Biersteker, 2002), MNCs have been studied for their self-regulation initiatives (Gond et al., 2011; Haufler, 2001, 2010), provision of public goods (Bernhagen & Mitchell, 2010; Scherer, 2016), and active engagement in multi-stakeholder initiatives (Grosser, 2016; Lundsgaarde, 2017; Moog et al., 2015).

The above studies share one characteristic; they approach and analyze MNCs from a macro position rarely investigating the inner workings and establishment of anti-corruption within corporations. In this study, I take as my point of departure the increased focus on corporate anti-corruption practices (Hansen & Tang-Jensen, 2015; Sampson, 2015; Slager, 2017), but I also go a step further by examining *how anti-corruption is integrated with business in multinational companies*.

Anti-corruption is not a built-in department or function in organizations since it is not a necessary part of the production process. It has to be artificially imposed as a function within business practices. According to this paper's findings, this happens in several moments along the practice of anti-

corruption through strategies of translation. The background whereby these strategies unfold is the process of risk assessment; a procedure which aims to uncover where and how people within an organization are more likely to misbehave. That is not to say, however, that these strategies take place exclusively during the risk assessment process or consecutively as presented in this paper. Rather they should be seen as a representation of the rationale driving the actions of compliance officers and how they integrate ethics into business practices. Ultimately, a process by which business practices turn into risks and from there to anti-corruption and compliance emerges. In other words, an 'anti' policy such as anti-corruption aiming to repress 'bad things' (Walters, 2008, p. 267) turns to compliance aiming to influence and control people and behaviors (Parker & Lehmann Nielsen, 2009) within the corporate space. This finding support this paper's argument that evidence of the political aspect of corporations can be found within their operation and function.

In corporate common parlance, the terms 'anti-bribery' and 'anti-corruption' are rarely used except for corporate social responsibility (CSR) reporting. At the same time, anti-corruption is referred to as compliance. Corporate compliance is the department concerned with the adherence of the organization and its members to relevant legislation (Oded, 2013). In that sense, a compliance department is not exclusively occupied with anti-corruption laws but also with human rights, anti-money laundering, trafficking, data protection, terrorism, sanction control and many other issues depending on the company's operation. The responsibilities of the compliance department or officer have been largely defined by the Sarbanes Oxley Act of 2002 (2002), a US legislation aimed at enhancing corporate responsibility and financial disclosures, and combating corporate and accounting fraud (U.S. Securities and Exchange Commission, 2002). In short, the responsibilities of a compliance department are to establish those internal procedures that will 'prevent, detect and respond to unethical and/or unlawful behavior' (Gottschalk, 2011, p. 64).

The objective of this article is to explore corporate anti-corruption in the making; who organizes it and how it spreads across the organization. I draw on Actor-network theory (ANT) and in particular its embedded sociology of translations (Callon et al., 1986; Latour, 1988, 2005) where the object of analysis is the anti-corruption expert and his or her doings in their 'natural habitat', the corporation. A significant advance offered by ANT is that it allows the disasembly, instead of observation, of anti-corruption as a 'black box' (Latour, 1999). Black box is a mechanism which is considered so efficient

that only inputs and outputs are of interest, at the expense of its inner organization. By opening it, concepts such as business practices, corruption risks, anti-corruption, and compliance are understood as malleable concepts subject to translations and therefore with different meaning (Power, 2007; Slager, 2017). Depending on points of view and actor interests they can be translated for any use actors deem important 'for their own or somebody else's use' (Czarniawska & Joerges, 1996, p. 23). In this sense, anti-corruption compliance can be seen as a result or effect of inner workings and not the cause of further events and actions or outcome of external pressures (Czarniawska & Hernes, 2005).

The study's contribution is twofold: first, by utilizing ANT's concept of translation it offers insights on corporate anti-corruption and how changes emerge and change the relationship between the corporation and its members (Czarniawska & Sevon, 1996). Second, this study contributes to discussions pertaining to the sociopolitical role of corporations by allowing them to be seen as such in a delimited but more autonomous role in relation to the global environment or governments. The paper develops as follows: In the next part, I review the literature on global anti-corruption, highlighting a lack of focus on how corporations control corruption in-house. Part 3 discusses ANT and elaborates on its concept of translation. Part 4 is dedicated to the methodology employed. In part 5, I start the analysis by presenting the practice of risk assessment to set the scene for the presentation and analysis of the following three strategies by which ethics are being translated into business. In part 6, I discuss the findings in light of theories on the role of corporations as sociopolitical actors, suggest future research directions, and conclude with the paper's limitations.

2. Anti-corruption in MNCs

Much of the scholarly attention and discussion on anti-corruption revolves around the role and interplay of public and private actors in dealing with those social issues globalization and the expansion of MNCs globally helped deteriorate. An indicative study showing exactly how such relationships may, even metaphorically, form, comes from Crane et al, (2008) where the authors argued for three metaphorical conceptions of corporate citizenship. In the first metaphor and corporations are conceptualized as citizens. Here corporations are considered as members of pluralist communities subject to certain obligations and entitled to rights just like any other member. In this sense, corporations are obliged to comply with regulations but at the same time play an instittutional

role in rule-setting by participating or influencing the decision making process. In the second metaphor, corporations are conceived as if their were governments and therefore responsible for the provision of public goods and services. In this case, corporations, are not just subject of rules or entitled to rights but in fact, corporations do shape and inform how such rights and duties apply to citizens. Finally, in their third metaphor of corporate citizenship, Crane et al (2008, p. 10), suggest that 'corporate activity itself can shape opportunities for corporations' stakeholders to act as if they were citizens in relation to the corporation'. In other words, corporations are conceptualized here as 'arenas' whereby stakeholders may act as citizens in defining their status and entitlements (Crane et al., 2008). The focus thus is not on society per se but rather on these societal spaces corporate activity create whereby stakeholders interact with one another. This I argue is an important and interesting view on the sociopolitical role of corporations since it allows it to be extented beyond private-public relations and to a more organizational perspective of corporate citizenship and the relationships formed within corporate activity. To put the above framework into perspective I briefly discuss below the role of MNCs in anti-corruption. I start with corporations as subjects to regulations, and I continue with corporations as the main actors undertaking initiates to tackle corruption or other similarly ethical in nature issues. Furthermore, I discuss how anti-corruption as a matter of ethics is understood within corporations and how it has been organized.

On the one hand, anti-corruption is approached as a global regulatory framework prohibiting corrupt behaviors with governments, intergovernmental, and non-governmental organizations playing the role of the regulator (Jakobi, 2013; Nadelmann, 1990) while companies are considered as breeders of corruption (Wrage & Wrage, 2005), and therefore subject to regulative pressures. Global prohibition regimes theory is such an example whereby anti-corruption appears as a regime prohibiting 'the involvement of state and non-state actors in particular activities' (Getz, 2006, p. 256). In her study of international anti-corruption norms for example, Rose (2015), examines the instruments by which anti-corruption is enforced to states and assesses their impact. Similarly, other scholars argue for the business case of corporate compliance in the anti-corruption regime (Nichols, 2012), while others warn for the consequences of non-compliance (Yeoh, 2012). A large number of business and legal scholars, however, have cast doubt on the effectiveness of such a regime in ensuring compliance with anti-corruption in the corporate sector (Brewster, 2017; Getz, 2006; Jorge & Basch, 2013; Koehler, 2009; Weismann, 2009; Weismann, Buscaglia, & Peterson, 2014). Weisman (2009; Weismann et al.,

2014) for instance attributes this failure to control corruption in the very failure of the American inspired self-regulatory model of corporate governance which has collapsed. Others point out that the ineffectiveness of the anti-corruption regime does not necessarily rest on its own structure but rather in corruption's peculiar nature (Getz, 2006; Nadelmann, 1990).

On the other hand, other scholars approach MNCs as potential allies in the fight against corruption (Calderón et al., 2009; Heineman, 2009; Wrage & Wrage, 2005) and highlight the role of corporations in fighting corruption along with other social problems. Drawing on the growing power and capabilities of MNCs in globalization (Fuchs, 2007; Hall & Biersteker, 2002), scholars have argued for the socio-political role of the corporation which extends their obligations beyond mere economic profits (Detomasi, 2014; Moon et al., 2005; Scherer et al., 2014, 2016). According to this view, corporations are not merely subject to global regulations and norms but also lead such initiatives (Cutler, 2002), and voluntarily take various roles which in the past were considered strictly governmental (Scherer et al., 2016). The Maritime Anti-corruption Network (MACN) for example is such a private organization founded by dedicated maritime companies to free the maritime industry from corruption and benefit society at large. Currently, MACN hosts more than 100 maritime companies with significant contributions in fighting facilitation payments, rule setting, and establishment of greviance mechanisms in strategic locations around the world (Maritime Anti-Corruption Network, 2019). Another example comes from Heineman (2009) who suggests an institutional role for MNCs in the fight agaisnt corruption. More particularly, Heineman argues that besides the economic development MNCs offer to host countries, corporations can and should be engaged not only to institution and governance capacity building but also to the application of such anti-corruption rules in practice. This, Heineman argues (2009), is crucial for MNCs since the rule of law and the subsequent respect of property rights, contract enforcement along with legal and regulatory predictablity are essential for business to thrive.

Following the above, organizations including MNCs are expected to introduce and implement corruption control programs (Parker & Lehmann Nielsen, 2009; Weller, 2017). Indeed, management scholars concerned with the normalization of corruption in organizations (Ashforth & Anand, 2003; Spicer, 2009) argue that reversing such situations requires the establishment of ethics training, inculcated and institutionalized ethical principles, accountability, and transparent practices (Anand et

al., 2005). From an organizational perspective, scholars have sought also to examine how such programs control corruption and corrupt practices in organizations. Along similar lines, others maintain that to end corruption in an organization, the work of 'social actors' such as institutional entrepreneurs is required to introduce anti-corruption logics and practices (Misangyi et al., 2008) allowing for the organization to restore its legitimacy with stakeholders (Pfarrer et al., 2008). Likewise, scholars of global governance and international relations have referred to 'norm' (McCoy & Heckel, 2001) or 'transnational moral entrepreneurs' (Nadelmann, 1990), and their role in influencing public and political support with regards to the rise and establishment of global prohibition regimes such as anti-corruption. What is common in this studies is that they conceptualize corruption and anti-corruption as opposing norms without, however, going into detail about how that would take place in practice and who would be responsible for it.

Taking a business ethics view, others analyze corruption control measures individually so to examine their effectiveness (Arthur et al., 2003; Kaptein, 2015; Kaptein & Schwartz, 2007; Miceli & Near, 2002). Codes of ethics, for example, have been examined as to whether they influence employee behavior with the majority of scholars agreeing that when combined with other appropriate control measures, codes of ethics may potentially be a good starting point for compliance (Adelstein & Clegg, 2016; Harvey, 2000; Kaptein & Schwartz, 2007; Stevens, 2008; Webley & Werner, 2008). Stevens (2008), for example, argues that when combined with a culture of integrity and proper communication, codes of ethics do influence employee behavior. Likewise, scholars have looked into anti-corruption and ethics training to examine the extent to which it impacts the establishment of ethical culture in organizations. While anti-corruption training is generally considered as effective and positively correlated with employee ethical decision-making and corruption prevention (Hauser, 2018; Ruiz et al., 2015; Verma et al., 2016), empirical work seems to offer contradictory findings (Jonson et al., 2016; Treviño et al., 2014). Waples et al (2009), in his meta-analysis of 25 studies of business ethics instructional programs, for example, found that their effect was minimal. Likewise, Jonson et al (2016), examined how 142 match pairs responded to a semester long business ethics course and found that its impact on ethical dilemmas was rather limited.

As the review shows, our knowledge and understanding of the evolution of anti-corruption in MNCs has progressed well during the last decades. However, an account of anti-corruption as a corporate

function is yet to be fully explored. Towards this direction, an increasing number of scholars have focused on the practice of anti-corruption (Hansen & Tang-Jensen, 2015; Osrecki, 2015; Sampson, 2016; Slager, 2017). Slager (2017), for instance, looks into the discourses of accountants to analyze anti-corruption. She maintains that the use of the concept of risk in constructing anti-corruption brings forth a central tension between discourses of corruption prevention and detection, ultimately crowding out ethics and collective initiatives. Similarly, Hansen and Tang-Jensen (2015), studied the practice of anti-corruption due-diligence performed by a law-firm on behalf of a company and found that practically anti-corruption practice in an organization seems to some extent to be aligned with the global anti-corruption regulatory regime. In this paper I seek to contribute to the above stream of research by setting the analytical focus on anti-corruption as it is practiced in MNCs by compliance officers. To that end, I employ the concept of translations from Actor-network to understand how anti-corruption is integrated into business practice and operation. In so doing, I examine not only the discourses of compliance officers or the classificatory system by which anti-corruption is assessed and imposed, but the actual means by which compliance officers interfere with the organizational and professional routine of their colleagues.

3. Actor-network and translations

Translations in social sciences have been associated with the interpretive and linguistic turns that took place in the last quarter of the 20th century (Schwartz-Shea & Yanow, 2012). The interpretive turn came as a reaction to a 'natural' model of social behavior and its being 'denuded of the human traits of researchers and researched' (Yanow & Schwartz-Shea, 2007, p. xii). Knowledge is something meaningful to people in a social situation and is produced both by participants and observers in their effort to understand/interpret what they experience (Rabinow & Sullivan, 1979). As a response to the above understanding of reality as completely socially constructed, Latour and his colleagues introduced Actor-network theory (ANT) and its concern with how actors construct and transform both knowledge and society (Callon et al., 1986). ANT's underlying premise is that there is only one world which can be translated in many different ways (Czarniawska & Sevon, 1996). What is experienced as the 'social' or a fact, is no more than group formation (network) between actors (Latour, 1984, 2005) who are connected with constructed connections understood as translations (Callon, 1984). Latour (1987) suggests an extended understanding and interpretation of the term

'translation' that goes beyond mere linguistic use. As he points out (Latour, 1987, p. 117), 'In addition to its linguistic meaning (relating versions in one language to versions in another one) it has also a geometric meaning (moving from one place to another)'. Translations therefore are linguistic and non-linguistic actions showing displacement of meanings and actors. This allows anti-corruption to be understood as a dynamic function constantly negotiated between organizational members instead of an imposed rule.

One form of translation employed by compliance officers is the *enrollment* of members to the network by translating and interpreting their interests through encouragement of participation, discussion, and deliberation (Callon, 1984). It is an effort to attract and distribute roles to as many as possible allies to a certain project, in this case anti-corruption. Another form of translation is '*interessement*', a transaction between three actors; it takes place when the main actor attempts to attract a second actor by placing itself between the second and a third actor (Callon et al., 1986). More geometrical in nature than enrollment, 'interessement' serves as the 'lock in' mechanism by which actors are rationally interested in a project or network (Latour, 2005). In addition, '*problematization*', is another form of translation whereby an actor attempts to attract other actors to the network by establishing 'an equivalence between two problems that requires those who wish to solve one to accept a proposed solution for the other' (Callon et al., 1986). In other words, problematization defines the problem and solution to be addressed and offered respectively by a network.

Translations such as enrollment, problematization, and interessement are necessary for understanding group formations as the 'material' of which social reality consists (Callon, 1984). While qualitative-ethnographic approaches require an a priori and arbitrary choice of 'level of analysis', ANT takes as its point of departure the formation of a socio-material construction regardless of whether this construction will ultimately survive, thrive, or simply dismantle (Latour, 2005). In so doing, it allows a connection between the micro and what is considered as macro worlds to be built (Czarniawska & Sevon, 1996) . The translations therefore performed by compliance and anti-corruption experts are not just linguistic interpretations but assign different meaning to business practices which are understood as corruption risks, anti-corruption, and compliance. Framing a business practice, for instance, as risky creates expectations for responsibility (anti-corruption) (Power, 2007). As we shall see below, however, anti-corruption also gets translated into compliance and thus is attributed with a

different meaning or else that of protecting the company from legal risks rather than corrupt practices. Taken together, these three strategies allow us to trace how standard business practices are being translated into corruption risks and from there to be re-defined as compliance, an issue much narrower and therefore more manageable than corruption itself.

While this paper is inspired by ANT in several ways, two points need to be made regarding its concept of translation, and the purpose of this paper. First, this paper restricts its interest in the concept of translation (Whittle et al., 2010) and therefore does not deploy ANT's full spectrum of epistemological foundations which have been the subject of criticism (Whittle & Spicer, 2008). Second, even within the concept of translation, the focus of this paper is on human actors, as opposed to non-humans, and as such it prioritizes human agency compared to traditional uses of ANT whereby agency is also attributed symmetrically to both humans and non-humans (Hardy et al., 2001). The limitations of such an approach are briefly discussed in the conclusion section.

4. Methodology

The empirical data for this study were collected mainly through 20 semi-structured interviews with anti-corruption and compliance experts in Copenhagen, Denmark, and Beijing, China during 2018 (Table 2). Data were also collected from participating in a conference, a seminar, a couple of e-learning sessions which resulted in hundreds of pages of notes and PowerPoint slides from presentations on best practices (Table 1). 16 out of 20 interviews were taped and transcribed by the author, while for the rest, handwritten notes were taken. 11 of the interviewees were occupied as compliance officers in western MNCs at the time of the interview. The remaining nine were occupied in NGOs, private consultancies, law firms, or collective business organizations. The comparability of the extracted data was ensured by the common background and field of expertise of the interviewees in corporate anti-corruption/compliance (Meuser & Nagel, 2009).

The selection of interviewees was based on publicly-available CVs on LinkedIn. I searched for people with long experience in anti-corruption who, through the process of 'snowballing', led me to more compliance experts (Ritchie et al., 2003). All of them were serving at the time or had served for several years as anti-corruption experts or compliance officers in corporations. Their duties included the establishment and development of a compliance system, advising companies on their compliance

policy, performing risk assessments, performing investigations and in some cases development of their own anti-corruption strategy or method. None of the interviewees, however, were trained as compliance or anti-corruption experts. Some were engineers, others lawyers, political scientists, economists, IT people, secretaries, people with a background in sales and even zoologists by training.

Data source	
Interviews	20 anti-corruption experts in Denmark and China
Participation in e-learning courses, conferences, and workshops	- ISO/TC Plenary- Anti-Bribery Management International Best Practices Symposium - China National Institute of Standards Seminar - TRACE E-learning session on gifts and hospitality - United Nations Anti-corruption E-Learning Tool
Documents	(Public) - Corporate codes of conduct, CSR/Sustainability reports, Policy documents, Legislation (Private) - PowerPoint slides, guidelines, internal documents shared in private sessions

Table 1: Data sources

The reasons for this may fluctuate from a lack in relevant education, to the urgent need for such a function (see paragraph below), or even to the personal interest of these people on the matter of corruption. Their expertise and expert knowledge come from practicing anti-corruption and compliance, regardless of their professional title. Indeed, recent developments in the sociology of knowledge literature highlight how knowledge and expertise should not be strictly identified with professional positions (Meuser & Nagel, 2009).The interviews and data collection were organized around three overall themes: 1) the role of anti-corruption and compliance department or officer in companies; 2) detailed information on practices performed by anti-corruption experts; and 3) daily professional activities and routine. In the texts produced by transcriptions, field notes, and PowerPoint slides, I searched for two things. First, I was interested in finding out which actors are engaged in compliance and by what rules they engage with it; the compliance department or officer and the senior management as well for sure. Likewise, sales and marketing staff since corruption often occurs right at the company's boundaries with external stakeholders. Furthermore, there are departments playing a double role; these assist compliance and are also checked for their integrity like the finance and legal departments. What are the rules under which they operate? Surely, international and national legislation and also corporate policy and culture.

	Place	Professional title	Assigned Interview No.	Duration
1	Copenhagen/Denmark	Consultant	A7	54 min
2		Compliance Officer	A4	66 min
3		Consultant	A6	67 min
4		Compliance Officer	A3	52 min
5		Compliance Officer/ Technical Advisor	A20	56 min
6		Senior Compliance Officer	A2	44 min
7		Compliance Officer	A4	50 min
8		Senior Compliance Director	A29	55 min
9		Head of Global Compliance	A8	62 min
10		Chief Compliance Officer	A5	48 min
11		Lawyer	A14	50 min
12		Compliance Counsel	A1	61 min
13	Beijing/China	Consultant	A12	81 min
14		Senior Director & General Counsel	A25	72 min
15		Compliance Director	A22	86 min
16		Compliance officer	A23	70 min
17		Lawyer	A19	55 min
18		Consultant	A26	53 min
19		Consultant	A28	53 min
20		Regional Compliance Director	A27	54 min

Table 2: Overview of interviewees

After repeated reads of the data, the overall practice of compliance emerged. Within that practice, other smaller-in-scale practices emerged including risk assessment, training, and due diligence. I focused on the practice of risk assessment and in particular on the negotiations, consultations, and conflict between organizational members taking place during its process. Once relationships and contradictions became clear, I applied the ANT theoretical framework in order to overcome 'loose ends and unconnected findings' (Meuser & Nagel, 2009, p. 10). For instance, the translation of business practices to corruption risks, and the translation of corruption itself to compliance seemed as two ends not necessarily related to each other, unless they are understood as a network built by a particular actor, the compliance department or officer.

5. Analysis

5.1 The practice of bribery risk assessment

Risk assessment is an estimation of these areas of business activity, including geographic areas, where a high probability of corruption exists. The scope of a risk assessment process is to expose the bribery risk of business practices in those areas of activity where corruption is more likely to occur. In other words, the objective of risk assessment is to shed light on business practices and in so doing render corruption risks visible. Towards that objective, the practice of risk assessment and task of a compliance officer or department is to gather 'sufficient, relevant information about the organization's business activities and relationships to enable it to determine how those features expose it to bribery risk' (Kenyon, 2013, p. 6).

> '…basically we start the whole process with a risk assessment. We need to find out where are the biggest risks in this area and we take different perspectives on risk. One is the geographical perspective and in that respect China comes in quite high on the list because China is probably one of the areas where kind of cultural aspect is influencing this. We also take a functional perspective on corruption risk where we look at they way we do procurement, how do we sell, do we need permits or licenses from the government and so on.' (Interview A7)

The information a compliance officer seeks while performing a risk assessment is both geographical and functional. Geographical information is about the areas of the world where the organization operates. MNCs operation usually spans over tens of countries around the globe and each country has its own institutional framework, culture, and developmental level all of which have been associated with levels of corruption (Holmes, 2015). Information is being extracted by publicly available corruption indexes and maps such as T.I's Corruption Perception Index (CPI) and the Global Corruption Barometer (GCB), as well as World Bank's Worldwide Governance Indicators on corruption control. Since 1995 for example, CPI measures the extent to which a country's public sector is perceived as corrupt by business people, experts, and analysts (Transparency International, 2016). Likewise, the GCB, measures the extent to which citizens perceive their country's public sector as corrupt (Global Corruption Barometer, 2017). Both in the CPI and GCB maps, countries perceived as corrupt are painted in bright red color whereas less corrupt countries as yellow. It follows then that in this rather simple process a compliance department produces its own map simply by

pinpointing the locations and operations of the organization around the globe with those resting on red color perceived as highly risky. For example, and given that perceived corruption is rather high in East Asia region, a company with operations there faces equally high bribery risks.

Operating in areas of the world where there is high bribery risk does not necessarily mean that an organization faces such risk wholesale. Nor does it mean that all employees or organizational members will share the same understanding of the local conditions. To counter generalizations of either kind, a compliance officer employs a more thorough scan of the organization's operation. The logic is quite straightforward; since as indicated, bribery requires a giver and a receiver to be completed, it is likely to take place exactly where the organization comes into contact with third parties. The focus thus is directed gradually from perceptions to more specific business practices that may host or be prone to such behaviors. One such example comes from the standard business practice of sales where hospitality and entertainment expenses include corporate funding for accommodation, gifts, and travelling expense. As a compliance officer explains, documentation and thorough control of the use of such funds is crucial in understanding corruption risks:

> 'We look for example in transactions like a bill for wine or meal for two people. If it is too high or issued from an abnormal place then regardless if it has been approved by the business and finance managers we will investigate more on the justification and necessity of such a payment.' (Interview 22)

Assessing the broad functional bribery risk exposure requires compliance officers to utilize quantitative tools such as questionnaires which are being distributed across the organization, internal audit reports, entertainment and hospitality practices, and past investigations all of them providing a broad view on where the organization may be more vulnerable to misconduct. Others helpful sources providing an overall view of the functional risk can be found in third-party or industry focused studies conducted by institutional actors such as the OECD, the International Chamber of Commerce, business collective organizations, private consultancies, and even governments. An indication moreover of the broader functional risk can be derived also from enforcement trends and past corruption scandals. The fairly recent case of GlaxoSmithKline (GSK) pharmaceutical company in China for instance revealed the extent to which pharmaceutical companies face similar risks.

'Basically because it's the pharma industry's own fault. Pharma industry used to engage in all kinds of behavior where you wouldn't necessarily be sure that you weren't unduly influencing HCPs (healthcare professionals) (…) So the way the business was described once way back you could bring gifts of various sizes to doctors, you could invite doctors to conferences or meetings that were abroad or at what could be perceived as precarious hotels providing accommodation.' (Interview A2)

Assessing functional bribery risk in a more targeted manner requires an in-depth understanding of an organization's operations. A compliance officer performing risk assessment is interested in understanding the business model of the organization. Some indicative areas of inquiry are, how does the organization come to contact with its customers, suppliers, and in general stakeholders? Does the company use sales agents or it has own salesman or retail stores? Who is responsible for procurements and how does the company make deals? Does the company work with governmental officials? Does it sell products to governments? Are employees aware of the company policies and relevant regulation? Do they know who to contact or is there anyone handling these cases? Typically, answers to such questions require interviewing the relevant people within the organization.

'In most cases (of risk assessment), I want to talk to people. If I go to a country I want to talk and meet the country manager. I want to understand essentially the configuration of the people there(…)I gather employees. I ask them casual questions to test of their awareness of our policies. Our policies in terms of traveling and entertainment. "Do you know our policy in terms of business courtesy? Do you know what kind of things you can do or you should not do or what kind of things you have to get prior approval before you can do it?' (Interview A25)

The compliance officer chooses who is to be interviewed. Virtually any member of the organization can offer valuable information on the matter of bribery risk. General or not managers, for example, provide information on the local conditions and point the direction towards the challenges their organization or team faces regarding bribery. The legal department provides information on the local regulatory environment and enforcement trends. Human resources provide information about the composition and details of the workforce. Employees of any kind moreover, can provide information on the conditions they face in the field and also about the local culture. To use again the

aforementioned example of GSK, a pharmaceutical company is based a lot in the interaction with healthcare professionals and doctors and therefore healthcare sales agents need to be interviewed as to how they promote products and what are the local expectations and demands for their job. Likewise, a logistics company crosses borders and customs regularly. In this case, truck drivers will provide information of the conditions they face when crossing borders.

> 'So for example one of the things we do is when we do a bribery risk assessment we try to get these people in a room and have a discussion about what actually happened' (Interview A6)

Interviews or talks with employees are usually unstructured and consist of casual questions on everyday professional activities. They aim to descriptions rather than events. The interviewee is required to describe daily activities and provide information (if) on challenges related to bribery. The officer does not seek to point the finger at anyone but rather to understand the business practices of the company at its most basic level. An invitation for an interview by a compliance officer is not an investigation on wrongdoing but rather about the conditions that could potentially lead to such wrongdoings and the overall goal is to locate and if possible prevent them from happening. Interviews are conducted face to face in meeting rooms or offices, but also through other technological mediums such as video or phone-calls.

Bribery risk assessment is not only about data gathering. Data does not mean much in itself but is compared with extant international and local legislation and enforcement trends. International legislation, or to be more precise legislation with extra-territorial authority is a method governments have been introducing increasingly the last two decades. Extra-territorial authority means that legislation is applicable regardless of the geographic area where the offense was committed as long as the accused has some sort of affiliation with the country in which the legislation was introduced. Two of the most commonly referred such legislation and landmarks on the fight against corruption are the U.S Foreign Corrupt Practices Act (FCPA) of 1977, and U.K Bribery Act (UKBA) of 2010. Whether the FCPA or the UKBA or any other legislation will be followed depends on the organization's main business operation and geographic expansion. As a common practice, the rule of strictest law is applied. That is to say, while international, national, and local legislation needs to be taken into consideration, in the case of incompatibility or conflict between them the risk will be defined by the strictest law.

'What we do is we start with what are the expectations to a company like ours. And that is well defined. It's national legislation at the moment, the UK Bribery Act, the FCPA which are extra-territorial so you need to comply with those everywhere in the world. Then of course we include any local legislation that is expected. Even if the local standards are stricter than for example the FCPA then we hold ourselves towards those local standards. But we also have our own internal procedures. So we say this is the way that we do business. And if those internal requirements are stricter that the local requirements then we adhere to the strictest ones.' (Inteview A2)

5.2 Strategy 1- enrolling actors in anti-corruption

The first strategy refers to the translation of enrolment compliance officers attempt to enroll actors in their cause namely anti-corruption. This is because on the one hand anti-corruption need to be communicated across the organization since it concerns all layers of the corporation. On the other hand, compliance and anti-corruption, as non-default corporate operations, cannot succeed if they are cutoff from the organizational operation and routine. Enrolment therefore has both quantitative and qualitative characteristics.

Enrolment starts with the practice of bribery risk assessment since the latter is one of the first actions an anti-corruption and compliance policy requires according to national and international regulations. As such it falls within the responsibilities of compliance officers. Risk assessment is the process by which compliance officers locate where and when it is more likely an employee to misbehave or in this case take or give a bribe (Kenyon, 2013). This is not to say, however, that compliance officers can achieve their objective singlehandedly. In contrast, the process of bribery risk assessment and an anti-corruption function require broader relationships and alliances to be established at an organizational level.

For a compliance officer enrolling colleagues in compliance and anti-corruption is primarily a matter of organizational order:

'What is really important is that you keep order in the company so the people know what they should do and what is the boundary. So that's really important for the company.' (Interview 12)

Indeed, as Callon and Law argue (1982, p. 622), 'The theory of enrolment is concerned with the ways in which provisional order is proposed, and sometimes achieved' . Order in this sense means to distribute roles so that every associate to the cause of anti-corruption knows what to do. As an experienced compliance and anti-corruption expert explains below:

> 'For example I had a business meeting yesterday and I said to the compliance officer 'I advise you to get some new allies, talk to the HR person, talk to the IT person', and this person was coming out of legal so no reason to talk to the legal people. And then also involve the business. Because you need to have that kind of cross functional dialogue…it's all about the people and we need to convince them. I have to convince you that this is the right thing to do and if I cannot convince you, you can pretend that you are convinced but then when you get under pressure you will fall back to your default.' (Interview A7)

First, roles are attributed to the relevant corporate bodies and actors to take on action depending on the perceived risk. The IT, HR, financial, and audit departments are enrolled early on in the process of risk assessment as supportive to the compliance function. IT and HR departments, for instance, are enrolled not as departments managing the organization's IT infrastructure or the workforce but rather as facilitators of compliance's function to locate people relevant to risk assessment. Similarly, the financial and audit departments are enrolled as information providers on risky transactions and on maintaining books and records according to relevant anti-corruption legislation. The importance of enrolling relevant actors, such as the HR department, to the process of risk assessment becomes evident in the next quote:

> 'That's really hard mostly because some factories are in places so remote without internet connection. We still try to get it up but the effort we put into it has been reduced because HR data is not the best for us. We do not have a list of the employees around. We spent a lot of time just to gather information and make sure that we have updated data on the employees; who they are, what's their name, what is their e-mail.' (Interview A4)

Second, the 'business' is also enrolled to the anti-corruption function not because of the support it offers to compliance but because of the bribery risk it might represent. From being the spearhead of

an organization, the sales department, for example, takes the role of the main liable and responsible department for misbehavior.

> 'The sales department in companies is normally my first focus because they are the frontline and the ones bringing in contracts. So I try to help them understand the difference between giving gifts and sales' (Interview 22)

Enrollment of the 'business' refers here not just to the enlistment of relevant actors to the resources available to compliance officers but also to the process by which actors realize their role in anti-corruption and how their decisions may lead to non-ethical behavior. This process requires shedding light on business practices and in so doing rendering corruption risks visible (Hansen, 2011). The next quote offers an indicative example of how such a translation and enrollment takes place in an organizational context. The example refers to a manager who is in the process of risk assessment wanting to gain the trust of his employees in order to make corruption risks visible in a specific area of the company's operation:

> '. . . he (the manager) had all his people in the room to talk about things and he sat there saying 'if you don't tell what really happens how we are supposed help you fix this? So they really told everything and then you see the people get relieved because they've been working in an environment where the code of conduct says one thing and the manager says something else.' (Interview A6)

The interest of the interviewees initially was not to talk about the conditions they faced when performing their duties as employees. One may assume that this was because there is an assumption or even practice out there that MNCs and managers care only for profits without paying attention to ethics and the methods through which these profits are generated (Taylor, 2015). The compliance officer then needs to settle this misunderstanding by clarifying the relationship between the two parts and explicitly express that the corporation and the employees want the same thing; *they share an interest*. Indeed, Latour (1987, pp. 108–109), called this translation 'I want what you want', claiming that this is the first step towards enrolling actors in a project.

Making corruption risks visible and framing a business practice as risky brings forth notions and expectations of actor responsibility and indeed self-responsibility (Power, 2007). That is to say that

bribery risk, from being an issue the compliance or anti-corruption department needs to deal with, becomes a problem in which many organizational actors need to be enrolled and activated if it is to be mitigated. In fact, the closer an organizational unit is to business practices, the more responsibility seems to be expected from that unit:

> 'So instead of us (compliance department) sitting and being the ones that really push the process, it needs to be our colleagues and partners pushing because they are the first line of action and defense.' (Interview A3)

Likewise, in the below quote, a compliance officer verifies that such notions of responsibility come up quite early in the process of risk assessment and enrollment:

'And I think some people feel the same way. They have done nothing wrong in their entire life and they are like ohh it's compliance…I wonder…no I better not say.' (Interview A4)

To sum up, enrolment as a translation has two distinct but related functions. First, enrolment refers to the enlistment of those corporate bodies and actors as resources to the anti-corruption function. In this sense, what is translated is the role of such actors and bodies as resources necessary for the achievement of anti-corruption or compliance function. Corporate actors become the 'vehicles' by which anti-corruption is mediated across the organization (Latour, 2005). Second, enrolment refers to the process by which these 'vehicles' realize anti-corruption as their own responsibility. This is achieved through making corruption risks visible and in particular in the realization on behalf of these actors that these risks pertain to their own actions and ways of doing business. In so doing, anti-corruption becomes each and every actor's ethical responsibility.

5.3 Strategy 2- interfering with business

Strategy 2 refers to the process by which compliance officers interfere with established and potentially risky ways of doing business by translating business practices to an ethically acceptable and less risky form. An indicative business practice in which misconduct is likely to take place is the area of 'entertainment expenses' (Cai et al., 2011). These costs occur as part of the socialization process between business partners interested in doing business with each other and include money spent for gift-giving, lodging, transportation, meals, or other events. Their purpose is to facilitate the

conduct of business between new partners. However, these activities may be considered as bribery since not only in certain settings they are expected or even requested but also the amounts of money spent may be excessive or aimed at gaining an improper advantage over competitors.

> 'Sometimes the sales people find the excuse that they have to pay for entertainment because otherwise they will lose the business. They seem to think the company's benefits but actually this practice is a risk for the company.' (Interview 22)

In order to stop and prevent such practices compliance officer are required to gain a thorough understanding of the business practice at hand is needed. Understanding business practices allows the compliance officer to 'hear' more than what is said or in other words to decrypt what his colleagues actually say to him during risk assessment interviews. In the below quote a compliance officer gives an example of how he translates the feedback he gets when interviewing colleagues from the sales department. Note that the interviewee used the concept of translation without any reference from my side to it:

'Bribery is forbidden. Of course, who would bribe? I would never bribe but take care of my customer? Of course I would. Take care of by paying a kickback, by giving a good gift, by taking my customer to a spa and giving him two bottles of expensive wine. Those are all taking care of the customer and have nothing to do with bribery … That's what I mean by saying that you got to translate the concept of bribery or corruption into everyday behavior that people, especially sales people, marketing people can relate to … you can try to influence but based on the merits of our goods and services and not by offering goodies. That's how you translate.' (Interview A25)

It is the compliance officer who translates here what his colleagues mean by 'taking care of' customers and point out that if this means any kind of bribery then such behavior poses a corruption risk for the company. In our example, the interviewer first reveals and then discards the common practice of 'taking care of customers' that his colleague from the sales department has been using. Then he offers a new translation of how business should be conducted according to anti-corruption rules. As mentioned earlier, neither compliance nor anti-corruption are default processes or functions in a production line; they need to interfere with standard procedures and practices if they are to have an effect. Interference takes place in different forms and depend on the situation at hand:

'Do you really want to handle that type of situation (bribery risk)? You can spend more time to dig out the real value of your services or product. Otherwise, it means that sales do not fully understand the needs of the customer. As a good sales department you need to really help your customer through the product you sell and not by putting yourself to a precarious and dangerous situation because you offered a bribe.' (Interview A22)

Sometimes, as the above quote shows, the interference takes the form of a clarification of what a proper practice of sales entails as opposed to established practices that may be prone to corruption risks. Compliance officers do so by reminding on the one hand how the practice of sales is about and the potential consequences on personal and collective level misconduct may lead to. In other cases, more organizational forms of interference and translation are preferred so to make sure that all employees abide by the rules:

'The management team has approved an internal gift shop and put it in the policy … instead of you buying something by yourself for the business partner or for the officials, you buy a gift from this gift-shop. You order it and your manager knows and approves it. Both from procedural-wise and substantial-wise points of view, I think the risk of corruption is significantly decreased.' (Interview A23)

What is actually translated here is the established way of doing business with customers by introducing a new system which requires employees to play by the anti-corruption rules applied by and to the company. In other words, by introducing new systems and logics of self-responsibility and liability, compliance officers put themselves between their colleagues at the sales department and the ways they might have been used to do business with the customers in an effort to interest the former in altering his or her business practices. Indeed, *interesting* an actor B requires actor A to weaken the links between B and other actors (Callon, 1984).

It is the offer of a new translation and alternative which actually realizes the interference with established ways of doing business. Otherwise, anti-corruption and compliance would simply remain at the level of recommendations and suggestions. To interfere thus means also to offer a new and improved way of doing business and to convince others that this is what is expected. Indeed, as another interview highlights, employees lack options and not a sense of responsibility:

> 'They (employees) probably do know what is right and wrong but maybe not in every detail and maybe they don't have ways to handle it. We are trying to not just illustrate a bad situation, what you can do and get out of it … call your manager, do not accept it, try to find an explanation to why you do not accept it.' (Interview A20)

Even when no wrongdoing has been done, individuals start to question their own actions based on the compliance framework even if that framework is not clear to him or her:

> 'If I invite someone for a meeting they can be like oh someone from compliance is inviting me to a meeting … what have I done and I'm like 'you haven't done anything'. That's part of the job.' (Interview A3)

Although feeling 'nervous' does point to a process of early self-assessment which requires the subject to be *interested* and re-evaluate his or her own business practices it should not be necessarily attributed to a convergence of interests alone. As Law argues (1986), interessement or interesting an actor may happen through the convergence of interests but also through a variety of means both physical and psychological. We cannot therefore exclude that other factors may be crucial to the success of compliance officers in their objective to establish anti-corruption in business practices.

To sum up, it is a part of the compliance officer profession to get between their colleagues and the ways they do business. Interessement involves attracting one entity by interfering between that entity and a third (Law, 1986, p. 71). Indeed, we have seen above how this interference may take place in individual or organizational level. Individually compliance officers listen carefully how their colleagues perform their business and if necessary they discard them as risky. At the same time they offer a new of way of performing these practices in an ethically and commercial acceptable way. In the organizational level, compliance officers, interfere with standard business practices by introducing new systems which limit the discretion of employees in their interaction with business partners. These systems are built and designed so as to follow national, international, and corporate rules regarding anti-corruption and how the company should make conduct.

5.4 Strategy 3 –narrowing down anti-corruption to compliance

Strategy 3 concerns the equation and translation of a major problem to a more manageable one for which a solution is more likely to be found. According to compliance officers, bribery risk cannot be adequately managed. This is because either as a personal choice and behavior or as a broader phenomenon, corruption is a challenging problem due to its peculiar nature. Indeed, as scholars have argued, the nature of corruption as a social problem makes it unlikely that measures will be effective enough to eliminate it (Getz, 2006; Nadelmann, 1990). The below quote comes from a compliance officer who shares such a view about corruption. In order not to self-discriminate, he used the metaphor of polluted air to simulate how he explained the issue at stake to his or her senior management during a risk assessment process:

> 'I cannot promise anyone that we will be error-free in our operations. What I can demonstrate is, first of all, let's all agree that the air quality is terrible. Do we all agree or not? If you agree, then let's say, what do we need to do to make sure we have healthy air? Well, you can have windows and doors, all those things. That's like your framework. That's like your system controls. You can make sure that on a bad day, in most cases, you make all your employees aware that we have masks downstairs in the reception area that we encourage you to use. On some days maybe we will require that you come and get a mask. On any day, you can go get a mask. I'll make sure that we have an air purifier in the office. In other words, the safest way to mitigate the risk of polluted air is to get out of here. Don't do business here. That's the safest. If you decide to stay here and do business, I want to make sure your doors and windows are well insulated, that you have masks, that you have air purifier. Beyond that, I can't do any more." (A25)

In this long quote, three points are of interest to us and these three points form the translation of *problematization*. The first point is that there is a major problem of corruption or air pollution as the interviewee put it. In this sense, this first point is similar with translation 1 in that it brings forth a problem or risk. The second point is the realization and communication that not much can be done to mitigate such a problem. Pollution or corruption requires much more than the will and efforts of a single company no matter how large it is. Therefore, a solution by interference to the business practice

itself may not be completely efficient. As a result, the third point refers to the suggested solution or translation of anti-corruption in the form of compliance with certain rules and procedures.

Compliance officers draw a clear line between what can be realistically done on behalf of his company and what is not possible. With regards to the latter, he is quite clear in arguing for corruption as an institutional problem which is unlikely to be countered or avoided by a single company. There is no measure which will ensure a risk-free operation. As another compliance officer put the same issue regarding the company's exposure to risks:

> 'We have risks in all areas. We have programmatic risks of accidentally doing harm with the programs that we run. We have safety risks and legal or compliance risks because we work in countries where law and order is not very transparent and can change quite rapidly. Then financial risks because we operate in many currencies with many different banking systems with large amounts of funds so a lot of risks there too'. (Interview A5)

Regarding the point on what is possible to be done to mitigate such risks including corruption, compliance officers suggests a number of tools which aim to reduce but not eliminate the company's exposure to the risk.

> 'I always talk with the senior management team and explain that I cannot change everyone. I cannot stop the sales from doing something bad. What I can do is to make the sales people think before they try to bribe by training and talking to them about our code of conduct' (Interview 22)

Thus, there are two kinds of challenges MNCs face; first, there is the risk of corruption the company has to face in its operation. As we seen above these risks relate to institutional or individual factors on which a company may have limited influence. Second, there is also the risk of punishment because of violation of anti-corruption legislation. The two risks overlap to a great extent but it is the latter challenge that compliance officers offer a solution to if the company is to address the first challenge as well.

> 'Anti-corruption usually referred as compliance. This can been seen from different angles. Compliance can be many things but usually compliance is seen as standing on two pillars.

One pillar being ethics and another pillar being regulations. Anti-corruption is just a set of measurements and a set of controls to actually make sure the company is staying compliant. Both legally and ethically compliant.' (Interview A8)

Compliance also presents a risk since no one can guarantee it 100%, but in contrast with corruption risk it offers some advantages. First, there are already incentives out there and a prescribed toolset and recipe by authorities and other institutional actors for enhancing corporate compliance (ISO, 2014; Ministry of Justice, 2011; U.S. DOJ & U.S. SEC, 2012; UNDOC, 2013). According to such guidance, a robust compliance system requires the senior management's commitment, risk assessment, training and communication, due diligence, and monitoring and review of the whole function. Second, while curbing corruption requires the willingness and cooperation of a variety of institutional actors let alone political, compliance requires only the willingness of a company. Third, anti-corruption compliance has been shown to be a business case with which companies can benefit both in terms of reputation and competiveness (Biskup, 2014; Gottschalk, 2011; Nichols, 2012). In other words, compliance risk is much narrower a problem than corruption because it is confined within the organization, supported by institutional actors, and is more manageable than corruption risk.

Gabel et al. (2009) points out, that while legislation such as the Sarbanes Oxley Act of 2002 stresses the importance of legal compliance *and* ethics in an organization's operation, the latter is rarely, if ever, taken into consideration by authorities when judging corporate cases of misbehavior. Other scholars have also concluded that legislation has failed to inspire or even impose a minimum respect on the 'spirit of the law' (Cragg & Woof, 2002; Weismann, 2009). This lack of emphasis on the ethical management of corruption leaves no other choice to compliance officers but to focus on its legal management, namely compliance with rules and regulations that at least prevent criminal liabilities. Indeed, as the following interviewee stated, compliance resembles a skill and therefore something that can be diffused in the organization through training:

'Compliance is basically a skill to ensure that you are in compliance with whatever kind of legislation, internal procedures, external expectations, and norms that are put in you as a company. So the skill of ensuring that you are in compliance with all that is the compliance

element and if you are not familiar with it, we are going to teach you what it means.' (Interview A2)

In contrast, as the next quote shows, anti-corruption used to be thought as a broad corporate responsibility based more or less on normative and voluntary initiatives left to the judgment of each company and actor:

'Before 2010, anti-corruption was part of the CSR agenda. We had to behave and we should not pay bribes and stuff like that. It was kind of as if we should not bully each other, we should not harass, we should not pollute. Later it became imperative because we could be fined, or lose our license to operate in the UK. So business managers saw that there was a consequence or possibility of consequence when not being responsible.' (Interview A7)

Translating corruption risk to mere compliance is not just a practical solution or a necessity imposed from external forces. It also shapes the relationship between the company and its members. Indeed, when compliance officers talk compliance, they mean the employees' compliance with the company's rules, policies, and regulations and not with external regulation:

'We have the rules and we have the preaching of those rules. We always talk about our code of conduct rules as rules within the company. So if you breach something and if you potentially could be fired for something is because you breached the code of conduct and not the FCPA'. (Interview A3)

A relevant example for the above position is the Code of Conduct (CoC), compliance's master codebook. A tailored CoC contains the ethical principles, values, corporate rules and policies, and consequences in case of breach, of an organization (Consultive Committee of Accountancy Bodies, 2014). Adherence to the CoC means acceptance of corporate compliance; the point here is that compliance derives from the author and issuer of the CoC, in other words the compliance department and senior management respectively delimiting thus anti-corruption to corporate boundaries.

'We have a small handbook, the code of business; it says that we can no longer go to a strip-clubs as long as we work for this company. You can do it privately but you cannot take customers or suppliers. We will not be associated with that (…) is it legally required? No this has been decided

by the management (…) it is not really illegal per se but it's something we will not be associated with.' (Interview A4)

6. Conclusion and discussion

In this study, I argued for closer and more focused attention on corporate anti-corruption as an organizational function and not just a norm. In order to do so, I employed an approach inspired by Actor-network theory and in particular its inherent sociology of translations. An ANT approach takes departure not in anti-corruption itself but in the translations between actors leading (or not) to such a construction. As a result, internal workings and organizing come to the fore, allowing an appreciation of the political role of corporations with regards to their members. The findings include three strategies compliance and anti-corruption experts use to integrate anti-corruption into business practices. The first strategy refers to the enrollment of relevant actors to anti-corruption by making visible their business practices and therefore responsibility. The second strategy refers to the interference of anti-corruption with these practices, and in the third strategy, anti-corruption and responsibility are narrowed down to corporate compliance, a risk that is much narrower and more manageable.

Such findings have implications for our understanding of the political role of corporations; first, they substantiate the claim that corporations play a political role by showing that MNCs can be political in their own right and organization. This role is not exhausted or limited to inter-organizational relations but rather it develops and gets established within organizations. Although each and every translation utilized in corporate anti-corruption has its each own meaning and importance, for this paper of importance is rather what these strategies do as a whole and with regards to the sociopolitical role of corporations. Anti-corruption, an aspect of the sociopolitical role of MNCs, can be understood as the result and not the cause of further actions. If anti-corruption is the end result, then the sociopolitical role of corporations can be an internal function and in this sense its dynamics may shed light in similar cases pertaining to the social role of corporations such as data protection, sustainability, and human rights (Feldman & Orlikowski, 2011).

As a result, the political element is to be found not in the reaction of corporations to external expectations (Getz, 2006; Gond et al., 2011; Moon et al., 2006; Scherer et al., 2016), but to the

expectation of the company towards its members to act in a certain and compliant way. Such expectation comes close to Crane, Matten and Moon's (2008) work on corporate citizenship and in particular in their metaphor of 'stakeholders as citizens'. In their words (Moon et al., 2006, p. 90), 'corporate citizenship … envisages circumstances whereby corporate activity itself can shape opportunities for corporations' stakeholders to act as if they were citizens in relation to the corporation'. Indeed, establishing a compliance function in a company is shaping opportunities for employees to act as if they were citizens, since what is expected is compliance with corporate rules. This paper's claim, however, differs in that it is interested in the construction of these 'citizenship arenas' (Whelan & Moon, 2017) and not their effect once constructed, and in addition, it situates these arenas within the corporation since it refers to the establishment of a compliance relationship between the corporation and its own members. In this sense, corporate politics are 'smaller' in scale, delimited in range, yet equally powerful through bonds (or translations) between corporate members. In this case, the relationship between business and politics takes the asymmetrical but still well-matched form of 'politics within businesses', an area worthy of exploration in my opinion.

Second, by showing that anti-corruption, a policy aiming at addressing a social problem, is translated to compliance, a corporate strategy and objective, emphasizes that responsibility moves from social to corporate objectives such as compliance with the 'letter' but not the 'spirit' of the law. According to scholars concerned with corporate behavior, MNCs have gained enormous economic and political power which allows them to compete with governments in terms of capabilities (Fuchs, 2007). Likewise, other scholars have emphasized the voluntary willingness of MNCs to take on or contribute to the solution of social issues caused by globalization (Scherer et al., 2016). Yet the findings of this paper show that this might not be the case; MNCs either cannot or do not want to fight corruption as a broad social problem. In contrast, with the help of compliance officers, corporations 'appropriate' anti-corruption to their own will or capacity as compliance.

On the limitations of this study, at least two further points are worth mentioning. First, and as others have also discussed, an increased focus on human agency causes a collapse of ANT's social and natural world (Whittle & Spicer, 2008). As a result, an ANT informed reader will definitely have reasonable questions and objections. However, my intention was not to contribute to ANT studies but rather to approach the topic of anti-corruption through a different lens. I hope that for the time being

such an attempt will compensate for such limitations. Second, this study was based on the views of particular actors with particular mentalities (Miller & Rose, 2008; Rose & Miller, 2010). As a result, one might criticize it as one-sided or biased. To some extent, I also agree with such criticisms, yet this study should be read and understood as an ongoing study on anti-corruption and not as a definite answer to a specific question. Future studies should shed light to other human and non-human aspects of anti-corruption. For example, what is the role of materials and technology in general in the establishment of a corruption function and how do they influence its effectiveness and reach? Likewise, although compliance officers and top-management are certainly focal in the establishment of anti-corruption in companies, what about those who are being called to practice anti-corruption in their daily professional routine?

References

Adelstein, J., & Clegg, S. (2016). Code of Ethics: A Stratified Vehicle for Compliance. *Journal of Business Ethics*, *138*(1), 53–66.

Anand, V., Ashforth, B. E., & Joshi, M. (2005). Business as Usual: The Acceptance and Perpetuation of Corruption in Organizations. *The Academy of Management Executive*, *19*(4), 9–23.

Andreas, P., & Nadelmann, E. (2006). *Policing the globe: Criminalization and crime control in international relations*. Oxford: Oxford University Press.

Arthur, W., Bennett, W., Edens, P. S., & Bell, S. T. (2003). Effectiveness of training in organizations: A meta-analysis of design and evaluation features. *Journal of Applied Psychology*, *88*(2), 234–245.

Ashforth, B. E., & Anand, V. (2003). The normalization of corruption in organizations. *Research in Organizational Behavior*, *25*, 1–52.

Bernhagen, P., & Mitchell, N. J. (2010). The Private Provision of Public Goods: Corporate Commitments and the United Nations Global Compact. *International Studies Quarterly*, *54*(4), 1175–1187.

Biskup, R. (2014). The Benefits of Integrating Governance. Retrieved January 18, 2018, from http://deloitte.wsj.com/riskandcompliance/2014/03/06/the-benefits-of-integrating-governance-risk-and-compliance/

Brewster, R. (2017). Enforcing the FCPA: International resonance and domestic strategy. *Virginia Law Review*, *103*(8), 1611–1682.

Cai, H., Fang, H., & Xu, L. C. (2011). Eat, Drink, Firms, Government: An Investigation of Corruption from the Entertainment and Travel Costs of Chinese Firms. *The Journal of Law and Economics*, *54*(1), 55–78.

Calderón, R., Luis, J., Lvarez-Arce, A. ´, & Mayoral, S. (2009). Corporation as a Crucial Ally Against Corruption. *Journal of Business Ethics*, *87*, 319–332.

Callon, M. (1984). Some elements of a sociology of translation: domestication of the scallops and the fishermen of St Brieuc Bay. *Sociological Review*, *32*(1_suppl), 196–233.

Callon, M., & Law, J. (1982). On Interests and Their Transformation: Enrolment and Counter-Enrolment. *Source: Social Studies of Science Laboratory Studies Social Studies of Science (SAGE, London and Beverly Hills)*, *12*(12), 615–625.

Callon, M., Law, J., & Rip, A. (Eds.). (1986). *Mapping the Dynamics of Science and Technology*. Houndmills,Basingstoke, Hampshire RG212XS: The MacMillan Press LTD.

Consultive Committee of Accountancy Bodies. (2014). *Developing and Implementing a Code of Ethical Conduct: A Guide for Business and Other Organizations*. London. Retrieved from http://www.ccab.org.uk/PDFs/Code_Guidance_final_SG_Amends2.pdf

Cragg, W., & Woof, W. (2002). The U.S. Foreign Corrupt Practices Act: A Study of Its Effectiveness. *Business and Society Review*, *107*(1), 180–214.

Crane, A., Matten, D., & Moon, J. (2008). *Corporations and Citizenship*. Cambridge: Cambridge University Press.

Cutler, A. C. (2002). Private international regimes and interfirm cooperation. In T. J. Bruce, Rodney Hall Biersteker (Ed.), *The Emergence of Private Authority in Global Governance* (pp. 23–40). Cambridge, MA: Cambridge University Press.

Czarniawska, B., & Hernes, T. (Eds.). (2005). *Actor-network theory and organizing*. Sweden: Liber & Copenhagen Busines School Press.

Czarniawska, B., & Joerges, B. (1996). Travels of Ideas. In B. Czarniawska & G. Sevon (Eds.), *Translating Organizational Change*. New York: de Gruyter.

Czarniawska, B., & Sevon, G. (Eds.). (1996). *Translating Organizational change*. de Gruyter.

Detomasi, D. (2014). The Multinational Corporation as a Political Actor: "Varieties of Capitalism" Revisited. *Journal of Business Ethics*, 685–700.

Feldman, M. S., & Orlikowski, W. J. (2011). Theorizing Practice and Practicing Theory. *Organization Science*, *22*(5), 1240–1253.

Fuchs, D. (2007). *Business power in global governance*. Lynne Rienner Publishers.

Gabel, J. T. A., Mansfield, N. R., & Houghton, S. M. (2009). Letter vs. Spirit: The evolution of compliance into ethics. *American Business Law Journal*, *46*(3), 453–486.

Getz, K. A. (2006). The Effectiveness of Global Prohibition Regimes: Corruption and the Antibribery Convention. *Business & Society*, *45*(3), 254–281.

Global Corruption Barometer. (2017). *People and Corruption: Citizens' Voices From Around The World*. Retrieved from https://www.transparency.org/whatwedo/publication/people_and_corruption_citizens_voices_from_around_the_world

Gond, J.-P., Kang, N., & Moon, J. (2011). The government of self-regulation: on the comparative dynamics of corporate social responsibility. *Economy and Society*, *40*(4), 640–671.

Gottschalk, P. (2011). *Corporate social responsibility, governance and corporate reputation*. *Corporate Social Responsibility, Governance and Corporate Reputation*. Singapore: World Scientific Publishing Co Pte Ltd.

Grosser, K. (2016). Corporate Social Responsibility and Multi-Stakeholder Governance: Pluralism, Feminist Perspectives and Women's NGOs. *Journal of Business Ethics*, *137*(1), 65–81.

Hall, R. B., & Biersteker, T. J. (Eds.). (2002). *The Emergence of Private Authority in Global Governance*. Cambridge: Cambridge University Press.

Hansen, H. K. (2011). Managing corruption risks. *Review of International Political Economy*, *18*(2), 251–275.

Hansen, H. K., & Tang-Jensen, M. H. (2015). Making up corruption control: Conducting due diligence in a Danish law firm. *Ephemera-Theory and Politics in Organization*, *15*(2), 365–385.

Hardy, C., Phillips, N., & Clegg, S. R. (2001). Reflexivity in Organization and Management Theory: A Study of the Production of the Research `Subject'. *Human Relations*, *54*(5), 531–560.

Harvey, J. J. S. (2000). Reinforcing Ethical Decision Making Through Organizational Structure. *Journal of Business Ethics*, *28*, 43–58.

Haufler, V. (2001). *A public role for the private sector : industry self-regulation in a global economy*. Carnegie Endowment for International Peace.

Haufler, V. (2010). Disclosure as Governance : The Extractive Industries Transparency Initiative and Resource Management in the. *Global Environmental Politics*, *10*(August), 53–73.

Hauser, C. (2018). Fighting Against Corruption: Does Anti-corruption Training Make Any Difference? *Journal of Business Ethics*, *159*, 1–19.

Heineman, B. W. (2009). The Role of the Multi-National Corporation in the Long War against Corruption. In R. I. Rotberg (Ed.), *Corruption, Global Security, and World Order*. Cambridge: Brookings Institution Press.

Holmes, L. (2015). *Corruption : a very short introduction* (1st ed.). Oxford: Oxford University Press.

ISO. (2014). *ISO 19600: Compliance management systems*. *ISO 19600:2014*. Retrieved from https://www.iso.org/standard/62342.html

Jakobi, A. P. (2013). Global Anti-Corruption Norms. In *Common Goods and Evils?: The Formation of Global Crime Governance*. Oxford Scholarship Online.

Jonson, E. P., McGuire, L., & Cooper, B. K. (2016). Does teaching ethics do any good? *Education and Training*, *58*(4), 439–454.

Jorge, G., & Basch, F. F. (2013). How has the private sector reacted to the international standard against transnational bribery? Evidence from corporate anticorruption compliance programs in Argentina. *Crime, Law and Social Change*, *60*(2), 165–190.

Kaptein, M. (2015). The Effectiveness of Ethics Programs: The Role of Scope, Composition, and Sequence. *Journal of Business Ethics*, *132*(132), 415–431.

Kaptein, M., & Schwartz, M. S. (2007). The Effectiveness of Business Codes: A Critical Examination of Existing Studies and the Development of an Integrated Research Model. *Journal of Business Ethics*, *77*, 111–127.

Kenyon, W. (2013). Diagnosing Bribery Risk Guidance For the Conduct of Effective Bribery Risk Assessment. Retrieved from https://transparency-france.org/wp-content/uploads/2016/04/Diagnosing_Bribery_Risk-1.pdf

Koehler, M. M. (2009). The Foreign Corrupt Practices Act in the Ultimate Year of Its Decade of Resurgence. *Indiana Law Review*, *43*, 389–396.

Latour, B. (1984). The power of association.

Latour, B. (1987). *Schience in Action: How to follow scientists and engineers through society*. Cambridge, MA: Harvard University Press.

Latour, B. (1988). *The pasteurization of France*. Cambridge and London: Harvard University Press.

Latour, B. (1999). *Pandora's Hope: Essays on the Reality of Science Studies*. Cambridge: Harvard University Press.

Latour, B. (2005). *Reassembling the Social An Introduction to Actor-Network-Theory*. Oxford: Oxford University Press.

Law, J. (1986). The Heterogeneity of Texts. In M. Callon, J. Law, & A. Rip (Eds.), *Mapping the Dynamics of Science and Technology*. Houndmills, Basingstoke, Hampshire.

Lord, N. (2013). Regulating transnational corporate bribery: Anti-bribery and corruption in the UK and Germany. *Crime, Law and Social Change*, *60*(2), 127–145.

Lundsgaarde, E. (2017). Business Motives in Global Multi-Stakeholder Initiatives: Exploring Corporate Participation in Sustainable Energy for All. *Global Policy*, *8*(4), 464–473.

Maritime Anti-Corruption Network. (2019). MACN. Retrieved January 13, 2020, from http://www.maritime-acn.org/about-macn

Mark, G. (2012). Private FCPA Enforcement. *American Business Law Journal*, *49*(3), 419–506.

McCoy, J. L., & Heckel, H. (2001). The Emergence of a Global Anti-corruption Norm. *International Politics*, *38*, 65–90.

Meuser, M., & Nagel, U. (2009). The Expert Interview and Changes in Knowledge Production. In A. Bogner, B. Littig, & W. Menz (Eds.), *Interviewing Experts* (pp. 1–42). London: Palgrave Macmillan.

Miceli, M. P., & Near, J. P. (2002). What makes whistle-blowers effective? Three field studies. *Human Relations*, *55*(4), 455–479.

Miller, P., & Rose, N. (2008). *Governing the present: Administering economic, social and personal life*. Cambridge: Polity Press.

Ministry of Justice. (2011). *The Bribery Act 2010 - Guidance*. Retrieved from https://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf

Misangyi, V. F., Weaver, G. R., & Elms, H. (2008). Ending Corruption: The Interplay among Institutional Logics, Resources, and Institutional Entrepreneurs. *The Academy of Management Review*, *33*(3), 750–770.

Moog, S., Spicer, A., & Böhm, S. (2015). The Politics of Multi-Stakeholder Initiatives: The Crisis of the Forest Stewardship Council. *Journal of Business Ethics*, *128*(3), 469–493.

Moon, J., Crane, A., & Matten, D. (2005). Can Corporations be Citizens? Corporate Citizenship as a Metaphor for Business Particiapationn in Society. *Business Ethics Quarterly*, *15*(3), 429–453.

Moon, J., Crane, A., & Matten, D. (2006). Corporate Power and Responsibility: a Citizenship Perspective. *ROR - Revue de L´Organisation Responsable*, *1*, 82–92.

Nadelmann, E. A. (1990). Global Prohibition Regimes: The Evolution of Norms in International Society. *International Organization*, *44*(4), 479–526.

Nichols, P. M. (2012). The Business Case for Complying with Bribery Laws. *American Business Law Journal*, *49*(2), 325–368.

Oded, S. (2013). *Corporate compliance : new approaches to regulatory enforcement* (2013th ed.). Cheltenham Glos GL50 2JA UK: Edward Elgar Publishing Limited.

Osrecki, F. (2015). Fighting corruption with transparent organizations: Anti-corruption and functional deviance in organizational behavior. *Ephemera: Theory & Politics in Organization*, *15*(2), 337–364.

Parker, C., & Lehmann Nielsen, V. (2009). Corporate Compliance Systems Could They Make Any Difference? *Administration & Society*, *41*(1), 3–37.

Pfarrer, M. D., Decelles, K. A., Smith, K. G., & Taylor, M. S. (2008). After the Fall: Reintegrating the Corrupt Organization. *Academy of Management Review*, *33*(3), 730–749.

Power, M. (2007). *Organizing Uncertainty: Designing a world of risk management*. Oxford: Oxford University Press.

Rabinow, P., & Sullivan, W. M. (Eds.). (1979). *Interpretive Social Science : A Reader* (1st ed.). Berkeley: University of California Press.

Ritchie, J., Lewis, J., & El am, G. (2003). Designing and Selecting Samples. In J. Ritchie & J. Lewis (Eds.), *Qualitative research practice : A Guide for Social Science Students and Researchers*. London: SAGE Publications.

Rose, C. (2015). *International anti-corruption norms: their creation and influence on domestic legal systems*. Oxford: Oxford University Press.

Rose, N., & Miller, P. (2010). Political power beyond the State: Problematics of government. *British Journal of Sociology*, *61*(SUPPL. 1), 271–303.

Ruiz, P., Martinez, R., Rodrigo, J., & Diaz, C. (2015). Level of Coherence Among Ethics Program Components and Its Impact on Ethical Intent. *Journal of Business Ethics*, *128*(4), 725–742.

Sampson, S. (2015). The anti-corruption package∗. *Ephemera-Theory and Politics in Organization*, *15*(2), 435–443.

Sampson, S. (2016). The "Right Way": Moral Capitalism and the Emergence of the Corporate Ethics and Compliance Officer. *Journal of Business Anthropology*, (Special Issue 3), 65–86.

Sarbanes-Oxley Act. (2002). H.R.3763 - 107th Congress (2001-2002): Sarbanes-Oxley Act of 2002 | Congress.gov | Library of Congress. Retrieved November 21, 2019, from https://www.congress.gov/bill/107th-congress/house-bill/3763

Scherer, A. G. (2016). Managing for Political Corporate Social Responsibility – New Challenges and Directions for PCSR 2 . 0, (May), 1–39.

Scherer, A. G., Palazzo, G., & Matten, D. (2014). The Business Firm as a Political Actor: A New Theory of the Firm for a Globalized World. *Business & Society*, *53*(2), 143–156.

Scherer, A. G., Rasche, A., Palazzo, G., & Spicer, A. (2016). Managing for Political Corporate Social Responsibility: New Challenges and Directions for PCSR 2.0. *Journal of Management Studies*, *53*(3), 273–298.

Schwartz-Shea, P., & Yanow, D. (2012). The Rhythms of Interpretive Research II: Understanding and Generating Evidence. In *Interpretive Research Design: Concepts and Processess* (Routledge). New York: Routledge.

Slager, R. (2017). The Discursive Construction of Corruption Risk. *Journal of Management Inquiry*, *26*(4), 366–382.

Spicer, A. (2009). The normalization of corrupt business practices: Implications for integrative social contracts theory (ISCT). *Journal of Business Ethics*, *88*(SUPPL. 4), 833–840.

Stevens, B. (2008). Corporate Ethical Codes: Effective Instruments For Influencing Behavior. *Journal of Business Ethics*, *78*, 601–609.

Taylor, A. (2015). Organizational Culture in Corrupt Companies - Corporate Compliance Insights. Retrieved December 13, 2017, from http://www.corporatecomplianceinsights.com/organizational-culture-corrupt-companies/

Transparency International. (2016). *Corruption Perceptions Index*. Retrieved from https://www.transparency.org/research/cpi/overview

Treviño, L. K., den Nieuwenboer, N. A., & Kish-Gephart, J. J. (2014). (Un)Ethical Behavior in Organizations. *Annual Review of Psychology*, *65*(1), 635–660.

U.S. DOJ, & U.S. SEC. (2012). *A Resource Guide to the FCPA U.S. Foreign Corrupt Practices Act*. Criminal Division of the U.S. Department of Justice and the Enforcement Division of the U.S. Securities and Exchange Commission. Retrieved from https://www.sec.gov/spotlight/fcpa/fcpa-resource-guide.pdf

U.S. Securities and Exchange Commission. (2002). SEC.gov | The Laws That Govern the Securities Industry. Retrieved January 4, 2018, from https://www.sec.gov/answers/about-lawsshtml.html#sox2002

UNDOC. (2013). *An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide*. Vienna. Retrieved from http://www.unodc.org/documents/corruption/Publications/2013/13-84498_Ebook.pdf

Verma, P., Mohapatra, S., & Löwstedt, J. (2016). Ethics Training in the Indian IT Sector: Formal, Informal or Both? *Journal of Business Ethics*, *133*, 73–93.

Walters, W. (2008). Anti-policy and anti-politics: Critical reflections on certain schemes to govern bad things. *European Journal of Cultural Studies*, *11*(3), 267–288.

Waples, E. P., Antes, A. L., Murphy, S. T., Connelly, S., & Mumford, M. D. (2009). A meta-analytic investigation of business ethics instruction. *Journal of Business Ethics*, *87*(1), 133–151.

Webley, S., & Werner, A. (2008). Corporate codes of ethics: necessary but not sufficient. *Business Ethics: A European Review*, *17*(4), 405–415.

Weismann, M. F. (2009). The Foreign Corrupt Practices Act: The Failure of the Self-Regulatory Model of Corporate Governance in the Global Business Environment. *Journal of Business Ethics*, *88*, 615–661.

Weismann, M. F., Buscaglia, C. A., & Peterson, J. (2014). The Foreign Corrupt Practices Act: Why It Fails to Deter Bribery as a Global Market Entry Strategy. *Journal of Business Ethics*, *123*, 591–619.

Weller, A. (2017). Exploring Practitioners' Meaning of "Ethics," "Compliance," and "Corporate Social Responsibility" Practices: A Communities of Practice Perspective. *Business & Society*, *00*(0), 000765031771926.

Whelan, G., & Moon, J. (2017). Corporations and Citizenship Arenas in the Age of Social Media. *Journal of Business Ethics*, *118*(4), 777–790.

Whittle, A., & Spicer, A. (2008). Is Actor Network Theory Critique? *Organization Studies*, *29*(04).

Whittle, A., Suhomlinova, O., & Mueller, F. (2010). Funnel of Interests: The Discursive Translation of Organizational Change. *The Journal of Applied Behavioral Science*, *46*(1), 16–37.

Wrage, S., & Wrage, A. (2005). Multinational enterprises as "moral entrepreneurs" in a global prohibition regime against corruption. *International Studies Perspectives*, *6*(3), 316–324.

Yanow, D., & Schwartz-shea, P. (Eds.). (2007). *Interpretation and method: Empirical Research Methods and the Interpretive Turn*. Armonk, New York: M.E. Sharpe.

Yeoh, P. (2012). Bribery Act 2010: implications for regulated firms. *Journal of Financial Regulation and Compliance*, *20*(3), 264–277.

Paper 2: Anti-corruption and its inherent tension: When rationalities of self-responsibility meet business identities

ABSTRACT

While anti-corruption and its proliferation in multinational companies has been attracting the attention of academics for more than two decades, little attention has been paid to the practitioners who actually realize such a function and in particular to how anti-corruption is thought of by compliance officers in corporations. In this paper, I seek to challenge the traditional understandings of anti-corruption as compliance, business ethics, and risk management, and by building on governmentality studies and interview data collected from compliance officers, I seek to reconstruct *the strategy or logic of anti-corruption*. I found that anti-corruption entails rationalities of self-responsibility promoted by compliance officers who consider themselves as business advisors. The combination of the latter two elements of anti-corruption implies a blurry orientation in which one element contradicts the other. In particular, the rationality of self-responsibility sides well with the consideration of anti-corruption as compliance and business ethics because it seeks to eliminate (ideally) corruption proactively and reactively. It contradicts, however, risk management since the latter is based on collective responsibility. In contrast, the practice of anti-corruption by compliance officers who consider themselves as business advisors is closer to the risk management program since its goal is to collectively manage and organize anti-corruption instead of eliminating it through judicial and ethical incentives advanced by the compliance and business ethics programs respectively. I suggest that this tension is caused by the inconclusiveness of practice and research regarding the causes of corruption.

1. Introduction

Anti-corruption has been consolidated as one of the major challenges in globalization, attracting the attention and resources of both public and private actors alike (Hansen & Stachowicz-Stanusch, 2013; Hauser, 2018; Lambsdorff, 2009). As a result, corruption control measures have been introduced by authorities and increasingly implemented in multinational companies (MNC) with the objective of steering clear from corrupt practices deemed responsible for social and corporate costs (Jorge & Basch, 2013).

Taking a departure from the above developments, scholars have employed a variety of reasonings as to how corruption should be curbed in organizations. Some, for instance, approach the employment of anti-corruption measures from a compliance perspective (Adelstein & Clegg, 2016; Bondy et al., 2008; Gottschalk, 2011; Kaptein & Schwartz, 2007). These studies examine anti-corruption as a matter of rule imposition and analyze the effectiveness of Codes of Ethics and Codes of Conduct as a solution to the phenomenon of organizational corruption (Erwin, 2011; Kaptein, 2015). Others argue, however, that formal and authoritative structures provide insufficient corruption control and advance a principle-based perspective (Lambsdorff, 2009; Paine, 1994). For example, some studies show how the ethically exemplar behavior of corporate leadership contributes to the establishment of a culture of integrity as treatment of the disease of corruption (Amernic & Craig, 2013; Miska & Mendenhall, 2018; Pasricha, Singh & Verma, 2017; Sims, 2000). More recently, the proliferation of risk management principles in anti-corruption practice has drawn the attention of scholars who critically examine the effects of such a change, pointing out the merits and weaknesses of this approach (Hansen, 2011; Slager, 2017). As risk, anti-corruption addresses organizational corruption from a collective perspective but also becomes commercialized and instrumentalized, however, at the expense of morality.

These studies have paid relatively little attention to those who actually implement anti-corruption in organizations and the ways they think about anti-corruption. Compliance officers are important in understanding anti-corruption because they are located in the focal and vantage position of integrating

abstract anti-corruption rules into everyday guidelines and practice. They are the 'moral compass' of modern corporations (Sampson, 2016), and in this capacity their objective and duty 'is to ensure there are adequate internal procedures and processes to drive integrity and ethical conduct throughout the organization' (Gottschalk, 2011, p. 64). Indeed, compliance officers report compliance related issues to the executive management as the 'ethical watchdogs of their companies' (Sampson, 2016, p. 72), 'encourage employees to do the right thing' (Sampson, 2016, p. 72), and utilize risk management to locate and prioritize corruption risks (Hardy & Maguire, 2016; Power, 2007).

I employ a government analytics approach (Dean, 2010) to understand *how anti-corruption is thought of in corporations.* Government analytics build on governmentality studies where the study of government is no less than the study of 'regimes of practices' as the organized and routinized ways of doing and thinking about government. As such, regimes of practices belong to the level of thought as a collective product not of the mind but of the explicit available knowledge and expertise people draw upon when they talk about governing. What is emphasized here is how 'mentalities of government' (Rose & Miller, 1992) are embedded in language and technologies of government usually taken for granted and thus not problematised by practitioners (Dean, 2010). To analyze a regime of practices therefore requires its identification as a field of governance, to examine its technical and rational dimensions as well as the identities formed within it, and problematize it against the bodies of knowledge it rests on. The understanding of such an assemblage of elements as intentional but non-subjective leads eventually to the construction of the *logic or strategy of government* (Gordon, 1980).

The paper contributes to anti-corruption literature by examining and problematizing the concept of anti-corruption for its robustness. Usually perceived as a unified set of controls with a single aim, this paper shows that not only does anti-corruption consist of different modes of thought but that these thoughts may point towards different orientations. In particular, anti-corruption as informed by compliance and business ethics programs, prioritizes self-responsibility as the reactive and proactive objective that will lead to the elimination of the problem of organizational corruption. In contrast, risk management rather seeks to organize and manage anti-corruption by acknowledging the role of individuals but at the same time elevating the responsibility to counter corruption on the

organizational and collective levels. This tension in anti-corruption, I suggest, reflects our inconclusive knowledge on corruption's peculiar nature.

The paper proceeds as follows. In section two, I briefly examine anti-corruption from the compliance, business ethics, and risk management perspectives, arguing that these reforming programmes represent ways of thinking regarding anti-corruption. In section three, I discuss Dean's (2010) government analytics, its conceptual origins, and I elaborate on the theoretical framework's main concepts. Section three concerns the methodology and methods employed, and in section four, I present the analysis in three subchapters, namely: making anti-corruption visible; rationalizing anti-corruption as self-responsibility; and the formation of the business advisor identity. I conclude in section five by discussing the strategy of anti-corruption and in particular how programs of compliance and business ethics on the one hand and risk management on the other lead to different orientations of the anti-corruption regime of practices.

2. Anti-corruption programs

Below I briefly review and discuss the literature on anti-corruption by focusing on three major approaches by which it has been practiced and analyzed, namely compliance, business ethics, and risk management. These approaches appear both in the academic literature and the professional practice of anti-corruption in organizations (Adelstein & Clegg, 2016; Bromiley et al., 2014; Nygaard et al., 2017). A major part of this paper's objective is to show that what people think about anti-corruption is shaped both from practice and theory without, however, giving priority to either. Each approach promises effectiveness in curbing corruption or more broadly unethical behavior in corporations, and their influence in corruption control is depicted in anti-corruption mechanisms such as risk assessments, training, and codes of conduct. This is not to say, however, that the three approaches are alike: compliance prioritizes an authoritative rule-based system to control individual behavior; business ethics seek to proactively predict and correct individual behavior by diffusing an ethical culture in the organization; and risk management borrows elements from both approaches in that it recognizes that individual behavior plays a role in curbing corruption but promotes a collective and organizational response to this challenge. Enterprise Risk Management (ERM) for example suggests 'the integration of all risks to an organisation's objective in a portfolio to inform organisational strategy'(Schiller & Prpich, 2014, p. 999) . I conclude the paper by arguing that the

three approaches informing anti-corruption require further examination as to their underlying logic or strategy which ultimately allows them to co-exist in corruption control programs.

Compliance

Anti-corruption as compliance refers to the top-down imposition of rules aimed at regulating and controlling employee behavior (Gottschalk, 2011). Compliance's function resembles a legalistic system whereby an authority regulates a field of activity with a set of written rules. These rules are supported by guidelines on their implementation as well as enforcement mechanisms and punishment measures in case of misbehavior. Compliance is based on rational choice theory in which individuals are considered as rational actors seeking to maximize their utility by calculating the costs and benefits of their prospective action (Kaufman, 1999). If the benefits from misbehavior are more than the costs then the individual will act so. Compliance thus tries on the one hand to increase the costs associated with corrupt practices, and on the other hand to increase the benefits for compliant behavior, although the latter is less common than the former. A good and paradigmatic example of how compliance is supposed to work in corporations is governmental legislation. The UK Bribery Act of 2010, for instance, makes it an offence for individuals to offer and receive bribes, as well as for companies to avoid using 'adequate measures' to prevent corrupt practices (Yeoh, 2012). With its extra-territorial authority, the UK Bribery Act can be applied by British authorities to cases of misconduct which occurred outside of the UK, and as the recent corruption case of Rolls Royce showed, companies face financial as well as reputational costs (Rose, 2012).

At the organizational level, compliance requires the development of a skillset comprised of a dedicated leadership, design and communication of anti-corruption policy, consistent enforcement of that policy, as well as reporting and monitoring systems (Freeman, MCP & MCT, 2007). In effect, the role of governmental legislation is supplemented by corporate Codes of Conduct (CoC), compliance's instrument of rule enforcement (Healy & Iles, 2002; Schwartz, 2001, 2004), and employee behavior shaping (Singh, 2011; Stevens, 2008). The CoC works as a filter through which the relevant regulatory framework under which a company operates is translated and integrated into

the business as basic guidelines that govern daily operation (Adelstein & Clegg, 2016). It is prescribed as a communicative tool of a corporation's or organization's dedication to anti-corruption internally and externally, and contains the ethical principles, values, corporate rules and policies of an organization (and consequences in case of breach) (Kaptein, 2004). CoC contain information on how employees should behave should they find themselves in a situation in which bribes are requested, for instance. Likewise, CoCs can contain guidelines on employee behavior regarding entertainment costs such as dining, gift-giving, and accommodation of business and third party partners. The underlying logic of compliance is that the more and better implemented and communicated are the rules, the less the possibility for corrupt practices to occur in the company (Verhezen, 2010). Having said that, the successful implementation of a CoC rests to a great extent to the determination of corporate leadership to impose anti-corruption rules in the organization even under the threat of sanctions (Stevens, 2008).

Business ethics

However, it has been argued by scholars that the rule-based top-down compliance is not adequate to strengthen anti-corruption in companies (David-Barrett, Yakis-Douglas, Moss-Cowan & Nguyen, 2017; Nygaard, Biong, Silkoset & Kidwell, 2017; Webley & Werner, 2008). Scholars of business ethics, for example, advance a principle-based reasoning of anti-corruption aiming at proactively predicting and controlling employee behavior (Weaver & Treviño, 1999). In theory, business ethics refer to 'the interaction of ethics and business' (De George, 1987, p. 204), which practically means how moral standards apply to individual or corporate policies and behavior regarding business (Goodpaster, 1996; Velasquez, 2014). In this line of thought, Adler and Borys (1996) maintain that employees will behave in a predicted way only if they can identify with the organization's goals. Indeed, as studies have shown, if the culture of a corporation is perceived as ethical, it is more likely that employees will follow, rendering the need for coercive means of rule imposition irrelevant (Goebel & Weißenberger, 2017; Integrity, 1994; Nygaard et al.). Consequently, anti-corruption is presented here as a norm and culture that can be diffused in an organization and infused to its members, thereby shaping their behavior. Nevertheless, while it can be difficult to empirically prove that a culture of anti-corruption exists in any given company, the comment of Uwe Dolata, representative of the association of federal criminal investigators in Germany concerning Siemens

and its well-publicized corruption case that 'Siemens had institutionalized corruption' tends to give credit to such a claim (Schubert & Miller, 2008).

According to scholars concerned with business ethics, an ethical organizational culture is diffused by the ethical and exemplar behavior of corporate leadership (Levine & Boaks, 2014; Minkes, Small & Chatterjee, 1999; Toor & Ofori, 2009), also known as the 'tone from the top'. Moreover, Paine (1994) argues that business ethics and compliance overlap since they more often than not use the same mechanisms and procedures; but business ethics are deeper, broader, and more demanding initiatives because they require ethos, responsibility, and active effort as opposed to rules, enforcement, and punishments. Most importantly, Paine (1994) continues, business ethics is 'the work of the management' (p. 111). Indeed, much of the literature on business ethics have sought to study the relationship, influence, and importance of leadership in establishing an ethical culture in corporations (Minkes et al.; Nygaard et al., 2017; Pasricha et al., 2017; Schaubroeck et al., 2012; Sims, 2000; Thomas, Schermerhorn & Dienhart, 2004; Toor & Ofori, 2009). Ardichvili, Mitchell and Jondle (2009), for instance, argued that the effectiveness of leadership is one out of the five characteristics of ethical corporate cultures. In another study, Grojean, Resick, Dickson and Smith (2004) suggest seven different ways leadership influences organizational culture. One can side with Schwartz (2013) then, who argues that strengthening ethical, or in our case anti-corruption, behavior in companies requires a set of values, a set of mechanisms, and an ethically exemplary management all three reinforcing one another.

Business ethics and compliance approaches to anti-corruption match with regards to the attributed importance of the 'top' for effectiveness. But while for compliance, leadership is important for its legitimacy and authority to impose rules, for business ethics, leadership is important in promoting an ethical culture where coercive means are effectively complemented but conceptually replaced by the training of employees on ethical behavior (Ferrell, LeClair & Ferrell, 1998; Palmer & Zakhem, 2001; Ruiz, Martinez, Rodrigo & Diaz, 2015; Verma, Mohapatra & Löwstedt, 2016). In a study of 200 business professionals, Hauser (2018), found evidence that anti-corruption training increases the likelihood of rejecting the rationalization of corruption. Indeed, other scholars have also found a positive correlation between training and an ethical corporate culture in organizations (Arthur, Bennett, Edens & Bell, 2003; Ruiz et al.; Warren, Gaspar & Laufer, 2014). Anti-corruption training

may be offered under different schemes, depending on the learning objectives and the setup of the organization (Biegelman & Biegelman, 2010). Managers or employees, for example, who face increased risk of misbehavior, require face to face methods as these have been considered more effective since they allow interaction in real time. When, however, the objective is to increase awareness to as many employees around the world as possible, e-learning methods may be more appropriate (Biegelman & Biegelman, 2008).

Risk management

In recent years, more and more companies approach anti-corruption as a risk. Enterprise Risk Management (ERM) for example, has dominated the risk management market during the last 15 years as 'a holistic approach for assessing and evaluating the risks that an organization faces' by allowing the integration of all risks faced by a company into a single platform where they can be collectively managed (Arena, Arnaboldi & Azzone, 2010, p. 659; Bromiley, McShane, Nair & Rustambekov, 2014). Garland (2003, p. 18) points out that a risk approach differs from 'traditional forms of moral and judicial reasoning' because it borrows and combines elements from the compliance and business ethics approaches. Risk management neither seeks to punish the misbehavior of individuals as a compliance approach implies, nor does it expect individuals to abide by the same ethical norms as a business ethics approach advances. Rather, it refers to a more complex understanding of social reality and rests on the premise that since individual actions can have an impact on many, then the responsibility is shared and risks can be managed collectively (Garland, 2003). Indeed, corporations are extremely complicated social and economic structures and their ability to expand across borders employing thousands of employees with different cultural backgrounds and ambitions only adds to their complexity. A risk management approach to anti-corruption therefore comes as an answer to this complexity by acknowledging the role of individuals in corruption, while at the same time elevating the responsibility to counter and manage it on the collective level.

According to Power (Power, 2004), there are two kinds of risks that corporations face − primary and secondary or reputational. The first refers to those risks caused by the default operation of corporations such as sustainability risks or hazards (Beck, 1992). The mining industry for example has been severely criticized for the environmental devastation their operation causes to the natural environment (Dashwood, 2012). The second refers to the risks constructed by corporations as a

defensive mechanism aiming at managing the changes caused by primary risks. Corporate social responsibility (CSR), including anti-corruption, for example, has been argued to be such a mechanism devised to actually prevent governments from introducing regulations in areas of corporate activity (Eichar, 2017). Of course, risk assessments can locate primary risks such as geographical and functional dangers for corruption, but they can also initiate what Hardy and Maguire (2016) call a 'riskification' process whereby anti-corruption becomes entrenched as the default way to talk about corruption. Once a business practice is framed as risky for corruption, its management or mitigation can begin (Hansen, 2011). In this sense, anti-corruption seems more like an 'organized uncertainty' (Power, 2007) since its discursive construction (Slager, 2017) allows it to be understood both as a risk to be managed and an opportunity as well (Andersen et al., 2014; Hansen, 2011).

Compliance, business ethics, and risk management can be understood as programs informing the practice of anti-corruption. Despite their inherent differences as to their point of departure and focus on individual and collective responsibility, they do share one thing − they are forms of reasoning representing ways of thinking about how corruption should be curbed in organizations. However, these 'deliberate and relatively systematic forms of thought that endeavour to transform' the practice of anti-corruption do not exhaust its intelligibility (Dean, 2010, p. 32). This is to say that in order to better comprehend anti-corruption, an analysis and construction of its logic is required. In the following section, I discuss governmentality and the analytics of government as a way to construct the 'intrinsic logic or strategy' (Dean, 2009, p. 4) constituted by the interplay between programs of compliance, business ethics, and risk management, and the rationalities and identities of anti-corruption.

3. Governmentality and government analytics

The paper draws on Dean's (2010) government analytics and conceptualizes anti-corruption as a regime of practices. In so doing, it challenges the institutional and organizational robustness of anti-corruption by focusing on the multiple technical and conceptual elements constitutive of anti-corruption. Dean (2010) builds on Foucauldian studies of government as the 'conduct of conduct' (Foucault, 1991, 1995), shifting attention from a singular understanding of government as the exclusive activity of political authorities, to government as the exercise of power by a broad range of societal institutions and sites including schools, the church, professionals, and the family to name but

a few, aiming at shaping and cultivating the behavior of other actors towards certain directions (Garland, 1997). To study the government of anything thus means to understand it as a practice which includes more than hierarchical power relations of who rules, by what legitimacy and authority (Dean, 2010). In this sense, governmentality is more than thorough descriptions of an event or practice and the exercise of power towards certain objectives. It means to be attentive to what constitutes the practice of government or what people think about governing, the knowledge that shapes their thoughts, the techniques employed, the identities of the governor and governed, as well as the spatial area where the above take place (Lemke, 2002; Rose, 2004).

The study of anti-corruption in corporations then requires more than an inquiry on the exercise of anti-corruption rules through technologies or techniques of rule. If anti-corruption is a governing practice then it can be studied as an organized *regime of practices* composed by such techniques, rationalities, fields of government, and identities (Dean, 2010). Regimes of practices refer to the routinized ways of doing things in certain times and places as well as to the ways we think about those practices. They are informed by *programs* in the form of bodies of knowledge and expertise which shape and are being shaped by the practices of government (Gordon, 1980). Programs are 'deliberate and relatively systematic forms of thought that endeavour to transform those practices' (Dean, 2010, p. 32). An analytics of government approach takes into consideration how regimes of practices and programs interplay by constructing through analysis the *intrinsic logic or strategy* of a certain regime of practices (Dean, 2010). Strategy or logic concerns the broad orientation towards ends of a regime of practices found on the non-subjective assemblage of all the aspects of a practice.

The analytics of government is the analysis of the four aspects of governing namely the technologies, rationalities, identities, and fields of visibility, and their logic which 'are necessary, somewhat autonomous and irreducible' (Dean, 2010, p. 42). Technologies of government refer to the mechanisms by which government becomes possible (Miller & Rose, 2008) because they allow rationalities to be realized as certain desired outcomes and therefore assist in shaping and directing the conduct of people (Rose, 2004). Moreover, it is the use of technologies which highlights the capacity of the governor to act as an authority even 'at a distance' (Callon, Law & Rip, 1986, p. 10). In the case of anti-corruption, they may include training schemes, assessment procedures and indexes,

standardization systems, reporting and awarding/punishing devices, as well as a range of best practices such as compliance champions and contests to increase awareness.

The government of anything, however, cannot be reduced to solely technical means. The analytics of government pay attention also to the dimension of rationalities understood as thoughts, expertise, knowledge, and strategies arise but also shape the practice of government (Dean, 2010). How people think about the practice of government is not a neutral process but implies a systematic way of reasoning. It is shaped by certain bodies of knowledge and expertise which in turn shape the practice of government as well (Rose, 2004). For example, thought about anti-corruption is shaped by the professional and academic expertise found in business related bodies of knowledge such as compliance, business ethics, risk management and so on. At the same time, thought produces its own expertise and knowledge. For example, performing bribery risk assessments informs the practice of government as to what the objectives of anti-corruption should be in a particular context.

Dean suggests that, in addition to technologies and thoughts, the analytics of government should include two more dimensions − self-identities, and fields of visibility − in their analysis. Government as the 'conduct of conduct' requires free people who can act and think and therefore may willingly participate in the government of others but also of themselves (Dean, 2010). In other words, humans can to some extent choose what thoughts and actions shape government. If that is the case, participation in government means that identities shape and are also being shaped. As we shall see in the analysis of anti-corruption in corporations, the identity of compliance officers has changed or is changing from 'corporate cops' and 'promoters or salespeople' of a particular way of doing business to entrusted business advisors.

The remaining dimension pertains to the visibility of the area of government. This is to say, the analysis should capture how actors 'see' who and what is to be governed, where government should take place, what the problem is and of course the proposed solution (Rose & Miller, 1992). By 'seeing' is not just meant a description of an area, place, or situation; rather it implies to locate and understand what is illuminated or obscured, who relates to whom and what and how these relationships play with each other (Dean, 2010). Therefore to render a practice of government visible is to analyze how it is perceived by those who think and act in this government. In this study, for example, anti-corruption is illuminated by the perceived need to protect the corporation through

compliance to anti-corruption rules. Light is also shed on what people do in a corporation, and who is responsible for what, but at the same time the broader social role of the corporation is obscured by that focus on the corporation.

However, the analytics of government and the purpose of this article is not exhausted in the analysis of the programs shaping anti-corruption but also aims to constitute the 'intrinsinc logic or strategy' of the anti-corruption regime of practices. The logic or strategy differs from programs in that it is not the property of any actor engaged in the practice. Rather, it borrows elements from all dimensions of the practice to form a non-subjective rationality which is irreducible to its constituents. Where programs are employed to reform a regime of practices, its strategy seeks to make this reform purposive for some ends. These ends are not to be confused with the subjective objectives and intentions of the reforming programs. As Gordon (1980) quite nicely put it, 'What is important is to avoid merging the concept of strategy into that of the programme by way of the image of the grand strategist and his plan' (p. 251). This is why the strategy or logic of anti-corruption is not to be found in the analysis of reforming programs of compliance, business ethics, and risk management but rather to be constructed through the analysis of the interplay of these programs and their operational non-subjective rationality (Gordon, 1980).

To sum up, anti-corruption is conceptualized as a regime of practices composed by technologies, rationalities, visibility, and identities which are shaped by programs of compliance, business ethics, and risk management. The objective of this study is to deconstruct anti-corruption as it is shaped by programs and in so doing to reconstruct through analysis the logic and strategy of anti-corruption.

4. Methods and data analysis

The purpose of the analysis was to understand and reconstruct how anti-corruption is thought of by compliance officers. I collected data through 21 interviews conducted with anti-corruption and corporate compliance experts during 2017 in Denmark and China (Table 1). The sample of experts consists of corporate officers and managers as well as anti-corruption and compliance consultants (Table 1). The two sources of interviews are complementary and helped me to acquire a more holistic view of the anti-corruption practice. Furthermore, Denmark and China were selected so the empirical data covers both the designing phase of corporate anti-corruption taking place in the headquarters but

also the implementation phase and initiatives in subsidiaries. Furthermore, changing countries and field mitigated the risk of 'enmeshing' the researcher in particular networks which may reinforce or silence other voices (Schwartz-Shea & Yanow, 2012). Doing fieldwork in China, for example, and approaching non-Danish companies and individuals allowed me to 'see' anti-corruption from a non-Danish and non-Western point of view.

Fieldwork was based initially on snowballing but halfway through the process it started to become more purposive and targeted (Ritchie, Lewis & Elam, 2003). For instance, while I was seeking to interview CSR managers, it became clear after the very first meetings that at least in corporations, the people I should be interested in are compliance officers and managers. The criterion of selection was the self-proclaimed experience of the expert in anti-corruption either in corporations or in other private organizations. The interviewees were contacted through LinkedIn which was also helpful in determining their level of experience through their publicly available CVs. The average duration of interviews was 55 minutes and interviews were conducted in an open manner and with the help of an elaborate topic guide. Elaborate means that the topic guide contained the main topics the interview should ideally touch upon without, however, defining the interview's development and structure which is built on the 'communicative opening up' of implicit stores of knowledge (Bogner & Menz, 2009, p. 48). The interviewees were asked to discuss their duties and daily activities as professionals, their understanding of anti-corruption, and their broader role in the company or as consultants. In later stages, as my understanding and knowledge on the topic grew, I asked for more elaboration and details on the above themes. Once I had a clear view of the formal compliance network and function in companies, I became interested in getting data on informal practices including thoughts, actions, and sayings of anti-corruption experts. Some of the quotes used below highlighting and pointing to rationalities of self-responsibility, or the changing role of the compliance officer from a 'corporate cop' to a trusted business advisor for instance, were the outcome of those elaborations.

In the analysis of the verbatim transcribed interviews, I followed the guidelines of the theory generating expert interview (Bogner & Menz, 2009). That is to say, the objective of the analysis was the production of 'interpretive knowledge' constructed only after it has been interpreted by the researcher. As Bogner and Menz (2009, p. 53) put it, 'interpretative knowledge is always the result of an act of abstraction and systematization performed by the researcher, an "analytic construction"'.

The analytical process consists of six stages, namely transcription, paraphrasing, coding, thematic comparison, sociological conceptualization, and theoretical generalization (Meuser & Nagel, 2009) (Table 2).

Following the transcription of the audio files, the data from each interview were paraphrased. Similar to the open coding process of grounded theory, paraphrasing played the role of an initial screening of data (Strauss, 1987). Each interview was scanned and thematized without altering either the original sequence of statements or terminology used by the respondents so to 'avoid giving away reality' (Meuser & Nagel, 2009, p. 35). Likewise, in preparation for the next phase of 'coding', the themes derived from the initial screening of the data were arranged thematically for each interview separately.

Date	Location	Professional Title	Assigned Interview No.	Duration
Winter 2016/17		Consultant	A16	60 min
		Consultant	A18	32 min
		Compliance Officer	A30	50 min
		Senior Compliance Director	A29	55 min
		Global Compliance Officer	A9	30 min
Spring/ Summer 2017		Consultant	A7	54 min
		Senior Compliance Officer	A2	44 min
		Consultant	A6	67 min
	Denmark	Compliance Officer	A3	52 min
		Compliance Officer	A4	66 min
		Compliance Counsel	A1	61 min
Autumn 2017		Chief Compliance Officer	A5	48 min
		Compliance Officer/Senior Technical Advisor	A20	56 min
		Legal Advisor	A21	52 min
		Consultant	A12	81 min
		Compliance Director	A22	86 min
		Compliance Officer	A24	77 min
Winter 2017/2018	China/ Beijing	Senior Director & Associate General Counsel	A25	72 min
		Consultant	A26	53 min
		Consultant	A28	53 min
		Regional Compliance Director	A27	54 min
Total /Average min	21/55 min			

Table 1: Interview sources

Each theme was examined more carefully now and coded in a focused manner (Saldana, 2009). Once passages from each interview were arranged thematically and coded, the process of thematic comparison took place. From that point on, the analysis surpasses the single interview. Themes from different interviews were compared to form major and collective 'second order' themes which are supported by the codes produced in the previous phase. In this process of meaning condensation (Kvale, 1996), going back and forth from data to codes and, where needed revising some, was necessary.

Transcription

Paraphrasing/Thematizing

Coding/meaning
condensation

Thematic
comparison

Sociological
conceptualization

Theoretical
generalization
(Governmentality)
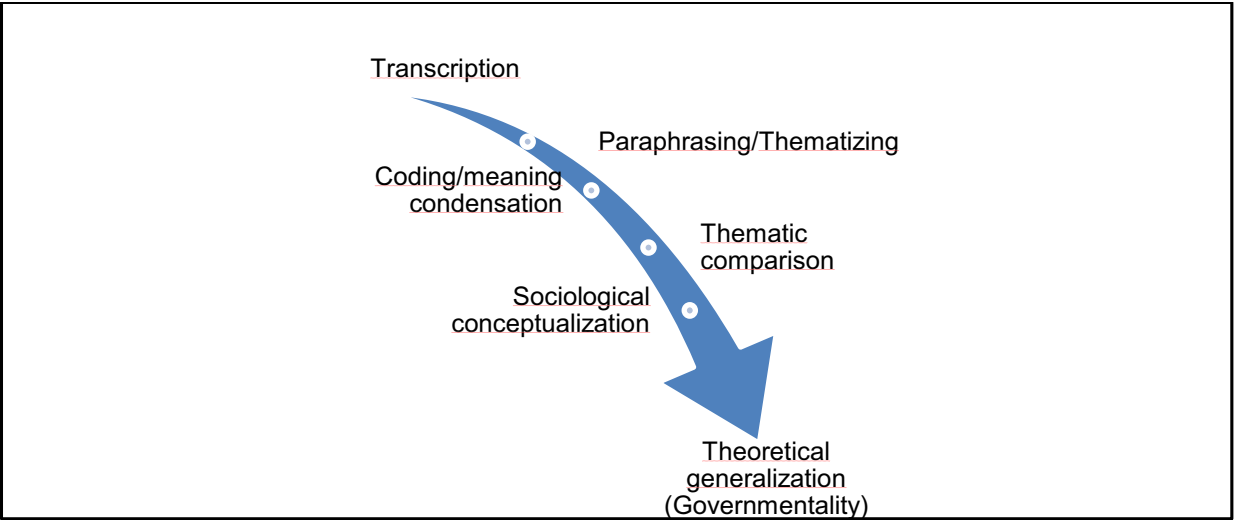
Table 2: The theory generating expert interview analysis process (Meuser & Nagel, 2009)

In the phase of sociological conceptualization, the objective was to form categories based on the comparison of themes. These categories were reviewed and revised, bearing in mind theories that could be applied without, however, altering, if possible, the empirical terminology. For example, *self-responsibility* was constructed as a main category following the comparison of a number of 'responsibility' themes found in several interviews (Table 3). It became apparent at that moment that for anti-corruption to function, compliance officers assign different roles and expect different responsibilities to be fulfilled. These responsibilities may be as common as a general dedication against corruption but also as different as the roles of the executive management and sales agent. Likewise, the identity of compliance officers as *trusted business advisors* was constructed from a number of themes found in several interview passages specifically concerning the responsibility of compliance officers. As we have seen, compliance officers are responsible for ensuring anti-

corruption compliance, diffusing business ethics, and locating and mitigating risks. It is the latter that revealed a pattern by which compliance officers claim the role of business advisor since neither locating risks nor preaching ethics or compliance per se justifies their presence in business meetings. Rather, it is their claimed ability to offer business oriented solutions.

Main constructed category	Interview themes	Indicative quotes
	Key stakeholders' responsibility	'And in that sense when we talk about corporate environment and ethical standards a lot of time is the influence by its key stakeholders and especially the internal stakeholders.' (Interview A12)
	Manager responsibility	'Also in the code of conduct it's where you can find where your responsibility is, and where it's your manager's responsibility. Because they do have more responsibility and it is compliance 101 because if you see that the manager does not respect or abide by the code of conduct why should I do that. It is very important to get them on board and also get them to be proactive if there is one of their employees who is not abiding that they need to speak up.' (Interview A3)
Self-responsibility	Employee responsibility	'We also tell our employees in this way that it is their responsibility. It is their behavior that counts at the end of the day.' (Interview A20)
	Company responsibility	'I guess no companies in Denmark would have an anti-corruption compliance program because it is so much closely built into the Danish culture. But due to the fact that we are an export country then we need to live in an export world. We have to be aware of that and we have to take that responsibility as a global company.' (Interview A7)
	Compliance officer responsibility	'It is our responsibility to ensure that they know what is the right way because not all our staff has a background to know this.' (Interview A20)

Executive management responsibility	'And then like I said we do spent a lot of time on more what I call governance resource types discussions with senior executives to try and help them realize what it is they need to do.' (Interview A6)

Table 3: Indicative example of constructed category (self-responsibility)

Finally, in the last phase of theoretical generalization, the findings and concepts are informed by a theoretical perspective, in this case governmentality and government analytics. In so doing, the reconstructive process is completed not only because of the findings in the forms of concepts but also because of their relationships, as these have been found but also informed by government analytics. In this study, for instance, the rationality of self-responsibility, along with the self-identity of trusted business advisor, and the field of corporate compliance relate to the mechanisms of anti-corruption and all together are constitutive of its strategy or logic.

5. Analysis

The current paper pertains to the analysis of the rationalities, technologies, identities and fields of visibility of anti-corruption as a regime of practices. While one can argue that anti-corruption government as compliance, business ethics, and risk management are about thought and therefore quite similar, their conceptual categorization is required in order to reconstruct the logic of anti-corruption. Since the logic of a regime of practices is non-subjective, however, none of the below sections or even quotes should be read independently and cut off from each other. The section starts by setting the scene with an analysis of how anti-corruption becomes visible and therefore governable in corporations. It continues by presenting rationalities of self-responsibility and identities of trusted business advisor. The unearthing of these two elements of the anti-corruption regime of practices reveals a tension in anti-corruption's logic in that the former element seeks to counter corruption with morality while the latter seeks to rather curb it with better organization and management. As I argue below this tension rests on the also contradictory reforming programs of compliance, business ethics, and risk management as well as on corruption's rather peculiar nature.

Making anti-corruption visible

Before anti-corruption compliance is governed it has to become visible to those who are supposed to govern it and also to those who will be governed by it (Dean, 2010), since being visible is necessary for governing anything (Rose, 1999). In other words, this section on visibility demarcates and delimits anti-corruption in several respects. For example, it makes clear that the application of anti-corruption refers to the corporation and its operation strictly. In this respect, visibility refers to the psysical borders of a corporation and what becomes visible to the people within these facilities.

While it can be argued that senior management plays an important role in supporting anti-corruption with its expected exemplar behavior and dedication to the fight against it, it is compliance officers who actually bear the burden of making it visible across the organization. As a compliance manager put it:

> 'And they (compliance officers) go to the internal meetings and really sit down with the business people, be visible to the business people, get information and provide advice.' (Interview A12)

On the one hand, compliance officers have to be present and thus visible in corporate meetings to 'get information and provide advice'. Their presence in board meetings should send a message that anti-corruption is an important feature of the company's operation. On the other hand, the subject of governance becomes also visible; the business people and in particular the way they implement (or not) anti-corruption and compliance principles when they perform their professional activities. However, the governance of anti-corruption does not take place only in board meetings. According to a compliance officer, it also includes the physical facilities and how these are being used to facilitate anti-corruption:

> 'I'd look around the physical facility and I look for signs of compliance efforts activities. Is my hotline posted in the employee lounge? In the easily accessible places, do people know who to call, where to call when they have a question?' (Interview A25)

This in turn relates to the fact that anti-corruption compliance has not always been a corporate 'thing' or a subject to governance. For instance, up until mid-1990s and with the excemption of the U.S,

corruption and in particular bribery of public officials by MNCs was considered an acceptable, and tax deductible, way of doing business (Hansen, 2012). As a result, and despite the fact that globally there has been much regulation, information, and access to advice and guidance, at the organizational level anti-corruption may still be a challenging endeavor. As one interviewee put it:

> 'They (employees) probably do know what is right and wrong but maybe not in every detail and maybe they don't have ways to handle it. We are trying, as a part of the training, to show them what they can do to get out of it'. (Interview A20)

Governing anti-corruption in corporations therefore includes making it visible to the broader population of the organization through the use of its physical facilities but as the above quote shows, anti-corruption, just like corruption, is about people and how they behave. Much of the effort by practitioners then is focused on enabling channels of communication between those who demand information on anti-corruption and those who supply such expertise. A common way by which companies try to make anti-corruption compliance visible and mobilize their people towards getting informed is by introducing the institution of the 'compliance champion':

> 'For instance in China, we innovated with a new way to help our staff, which is to appoint a compliance champion. For each of our business units we appointed one person as a compliance champion…The key task for that is to have a local point approachable for any of our employees.' (Interview 27)

The 'champions' are regular employees of the company who have been trained in compliance. Their work is voluntary, meaning they neither get paid more nor do they get any other advantage for the extra work; they are trained and announced as compliance champions and their objective is to provide guidance and advice on anti-corruption and compliance issues to their colleagues when asked to do so. As a first point of contact, a compliance champion is supposed to provide advice and guidance to their colleagues on compliance matters. Cases are escalated to the compliance department only when action and experienced handling is required. The rationale behind the positioning of a compliance champion in each working space was of course that it should be easy for employees to get information on how to stay compliant. However, placing a compliance champion in every business unit serves also in making anti-corruption visible to all employees.

Another way of making anti-corruption visible is through collective events with the aim to engage people with the topic. For example, a compliance department asked their colleagues in the company to enter a competition for the best anti-corruption poster design:

> 'What we did in fact was that we had a competition. We asked the employees to design their own poster on what our compliance team and culture should look like. Then we used the posters and we went to some designers to make it look nicer, but keep the content … just to make them look nice and more professional and we produced these posters and posted them everywhere. ' (Interview A29)

The participants were asked to draw designs based on their own perception of what the company's culture on that matter should be and how they would like to see the compliance department functioning. The winning designs would be used as the main posters in the company's anti-corruption campaign. Participants had three months to design their own poster and they uploaded them to a dedicate website where their colleagues voted for their favorite designs. The resulting top ten designs were sent to senior management which also voted for the best three designs. The winning designs were then sent to a professional designer to 'polish' and make them appropriate for official use.

The posters were hung on well visible walls of working spaces in the company. The aim of the campaign was to engage but also keep reminding employees of the importance of anti-corruption and indeed compliance. The message was quite simple, focusing more on the ethical side of anti-corruption. Moreover there was a prompt to employees to 'speak up' in case they faced relevant challenges or if they are aware of such cases. For that reason, directions on where to find instructions and support in the company if needed were also included and highlighted. In the same fashion, but with the intention of having a little more personalized effect on the individual and his or her private working space, traditional style stickers were also utilized. These stickers are usually stuck on the telephone surface or on the frame of the PC screen where they are easily visible and noticeable. The message again is simple and a characteristic word like 'compliance' in bold letters is accompanied by a corporate phone number or a hotline.

In some cases, however, illuminating anti-corruption is easier said than done. The reasons why anti-corruption does not seem to have an effect can range from personal to collective or institutional in

organizations (Ashforth & Anand, 2003; Kish-Gephart et al., 2010; Pinto et al., 2008),. For instance, resistance to anti-corruption and compliance can be a matter of demographics and gender as a compliance officer explained:

> 'It is usually older males who have been working for this business for more than 20 years who complain about it (anti-corruption compliance). They couldn't see that the landscape is changing and it doesn't really matter if you are working for company A, B, or C.' (Interview A4)

Nevertheless, in the case of non-compliance with anti-corruption rules, disciplinary measures can also be utilized. As a compliance manager put it:

> 'We review not only a manager's business achievements but also how they achieve those based on a compliance factor. We review whether he or his team had violated the company's policy in the past year in achieving that result. If yes, maybe his bonus will be reduced by 30%, or no salary increase, or no promotion.' (Interview A27)

In more extreme cases when individual behavior does not change regardless of the efforts, it is also common to let these people go from the company:

> 'And (we) also fired very talented people from management simply because they didn't get the point and continued doing business in the old way and with those guys and partners there, you don't really signal change.' (Interview A12)

The above example comes from a compliance officer who used to work for a company which was found guilty of corruption by the US authorities and as consequence had to re-structure its organizational compliance function. Those who did not align themselves with the company's new anti-corruption philosophy were let go, showing that in some cases proper behavior can be more important than short-term profits in corporations. As one of his colleagues expressed it:

> 'But I would say for us, the most important driver right now is actually the idea of sustainability. The idea that you do business with a long-term perspective. Working long term and looking more like a sustainable business rather than either protecting ourselves from

something bad or taking on responsibilities that go beyond what is normally considered company responsibility.' (Interview A9)

The common denominator observed in the quotes used in this chapter was the physical as well as institutional space of the corporation and how it is defined by the government of anti-corruption. Within this space, anti-corruption illuminates both the problem of corruption and the solution of anti-corruption, as well as the actors involved in it by distributing roles. This is a quite different case compared with narratives of corporate social responsibility since it places the focus of anti-corruption not in the social sphere but in the corporate. In this sense, making anti-corruption visible as something to be governed concerns the governance of the company and its overall interests and not the governance of society or even social issues as the governance literature has been highlighting for the last two decades.

Anti-corruption as rationality of self-responsibility

This next section concerns how compliance officers think about governing anti-corruption. Answering this question, however, requires us to look first into why people think that anti-corruption needs to be governed and what sort of rationalities are required in order to do so. In short, this section argues that compliance officers promote a sense of self-responsibility as a means to eliminate corruption. This self-responsibility concerns all corporate employees including themselves as well. This notion of self-responsibility is derived from established and traditional bodies of knowledge and expertise of compliance and business ethics reviewed in the literature review section and expressed in the interviews. As in the case of visibility, however, people first need to know what compliance is about. As an ex-compliance officer and current owner of a compliance consultancy states:

> 'I've met a lot of leaders and lawyers who work for companies but when I talk to them about compliance they are a little confused as to what this is exactly … I work for the people who need some kind of compliance awareness. I educate them what compliance is, let them know what it is about and try to push it in their daily operational work.' (Interview A26)

According to the interviewee, there is a gap of knowledge regarding what anti-corruption compliance is about. Anti-corruption experts appear here as filling in this gap by projecting knowledge and expertise on the subject matter:

'There is also an element of compliance that you are not familiar with and we are going to teach you what it means, what it means to you. So we identify the different areas that need additional focus through training and you set learning targets and then you identify this is what we like to achieve through the training'. (Interview A2)

By taking the position of the teacher or educator, compliance officers rationalize government of anti-corruption towards at least two directions. First, as a responsibility of compliance officers to educate their colleagues on what the right way of doing business is, and second as a responsibility of the employees to follow rules.

'It is our responsibility to ensure that they know what is the right way. They may know based on their values, background and education which by the way can be different around the world. They probably do know what is right and wrong but maybe not in every detail and maybe they don't have ways to handle it.' (Interview 20)

The 'right way' to do things advocated by compliance officers in turn implies a certain truth (Dean, 2010). There are probably many ways out there to do business but only one or few is right. Usually, when compliance officers say the 'right way' they mean the corporate way which is to be found in the company's code of conduct, a document to actually be followed as legal (Interview A4). As another compliance officer expressed it:

'So while you may in some cultures go out for drinks before you do any kind of business that is not the perceived as ethical. So we don't necessarily follow the local norms if they don't leave up to the same standards as we have globally.' (Interview A2)

Additionally, compliance officers rationalize anti-corruption governance towards a second direction; that of the responsibility of the employees to do what they have been taught to do so in such cases:

'Well, it is their (employees') responsibility when they are in a situation where they meet bribes and they need to act in the right way … We are not just illustrating this as a bad situation but we bring in what can be done in this situation. They can do this and this and get out of it. Call your manager, do not accept it. Try to find an explanation to why you do not accept an

envelope full of money … It is your behavior that counts at the end of the day.' (Interview 20)

In the literature, this process is known as 'responsibilization' (Shamir, 2008). Indeed, as Siltaoja, Malin and Pyykkönen (2015) argue, employees can be objects but also subjects of corporate social responsibility. Employees as objects refer to the responsibility of the company to secure an employee's well-being. Therefore, the necessary people and institutions/controls need to be in place when people seek them. In contrast, as subjects, employees, are expected to perform their duties, responsibly through the use of 'legal norms, moral exhortation, informal sanctions and tacit conventions' or in business terms codes of conducts and ethics (Siltaoja et al., p. 445).

The rationality of self-responsibility in anti-corruption governance requires self-governance which in this case takes the form of realization of a problem and the will to do something about it. As a compliance manager put it:

'I think what would be most important for me is for them to get a feeling for the culture. A culture to speak up and ask questions. You have to work on all these kind of things around it, so people feel good, so they're not afraid to actually tell you or talk to you or come to you. I think that's the most important thing, to create this kind of safety feeling.' (Interview A1)

The government of anti-corruption is informed here also by a broader narrative and objective of establishing a particular culture of communication between members of the company. So far we have seen how the problem of corruption becomes visible and what sort of assistance is provided in solving this issue. Self-responsibility refers here to the will of actors to seek help if and when they will face such an issue. Unless people speak up about the challenges they face neither they, nor the company, can seriously take on any responsibility. Similarly with visibility, challenges not only need to be made known in order for them to be answered but also to be thought as 'not right' before help is sought. Indeed, as I show in the next section, compliance officers think of themselves not just as investigators, punishers, or even moral guides of the corporation but rather as advisors offering their help and services.

The formation of business advisor identity

What kind of identities are being formed and help in the formation of the above thoughts? The three identities discussed below show the evolution of compliance officers and in so doing the different understandings or ways of thinking about anti-corruption through the years. First, is the identity of compliance officers as *corporate police* seeking to enforce rules by locating and punishing misbehavior. Second, is the identity of compliance officers as *sales agents* of ethical principles whereby the objective is the establishment of an ethical corporate culture through exemplar behavior. And third is the identity of *business advisor* where both rule and moral underpinnings of anti-corruption are overshadowed by the corporate element and business identity. This in not to say that one mode of thought replaced the previous but rather that knowledge and expertise on this particular area of activity is accumulated to form the current identity of business advisors. As will be discussed in the concluding section, 'policing' and 'selling' compliance and ethical rules is still a major part of the compliance officer's duty yet not their ultimate objective:

> 'The problem with our department is that it is kind of like being a police officer. You know when you are driving your car and suddenly the police wagon comes behind you and you are nervous even though you are doing nothing wrong. And I think some people feel the same way. They have done nothing wrong in their entire life and they are like 'ohh it's compliance … I wonder … no I better not say'. And it can't really be explained not because we are criminals because it is just … compliance is like an internal police department.' (Interview A4)

Policing business is to some extent a point of departure for corporate compliance. 'A corporate compliance program is a system designed to detect and prevent violations of law by the agents, employees, officers, and directors of a business' (Freeman et al., 2007, p. 358) and therefore it requires the existence and work of 'corporate cops' (Weber, 2006). The rules in turn which compliance officers seek to 'enforce' come to a great extent from the requirements set by legislation such as the Sarbanes Oxley Act (SOX) (2002) as well as the recommendations of the US Federal Sentencing Guidelines regarding corporate financial reporting. Hence, the presence of compliance officers point to the enforcement of certain rules against non-compliant behavior which incurs

punishment. However, it is interesting that compliance has been seen as a police function, meaning punishment, and not protection which is what the police as an institution is also supposed to do.

Towards this direction, some compliance officers presented themselves not only as police officers but also as salesmen:

> 'You need to have both sides. You need to be able to be a policeman sometimes because otherwise you wore out your own rules and policies although being proactive is preferable. And that is also why I act as a salesperson because I already have the policeman role before I even enter the room.' (Interview A3)

The view of the compliance officer as a salesperson derives more or less from their attitude in performing their duties. According to an article from Business Insider (2012), good sales people listen more than they talk while at the same time focus not on short term sales but on long term business. Indeed, a major part of being a compliance officer is also being able to listen to what your colleagues say about the challenges they face in performing their professional duties. This is what a risk assessment process is about (Kenyon, 2013); listening, learning, and uncovering in the end where and in which business practices are people prone to misbehavior. Moreover and as we have seen, the objective of a compliance system is to build and support sustainable rather than temporarily successful businesses. In this sense, compliance does not just enforce and punish if needed, but protects the company's long term survival.

Between the reactive role of a 'corporate cop' and the proactive role of a salesperson there is a third identity deriving from the work and sayings of compliance officers, that of being not just supportive but also the *guide* of the organization. Closely linked with the idea of 'educating' people on anti-corruption discussed above, guiding here implies that corporations had to some extent lost their way or lost the 'right way':

> 'Basically because it's the industry's own fault. It used to engage in all kinds of behavior where you wouldn't necessarily be sure that you weren't unduly influencing stakeholders … So that was the norm, and for many reasons the public has a lack of trust in (our) industry. Our objective now is to ensure that we are in compliance with whatever kind of legislation is relevant to us and that our business provides products in an ethical way.' (Interview A2)

Adherence then to rules is required in order to 're-calibrate' the organization but only to the extent that these rules do not obstruct and moreover support long term sustainable business. As one compliance officer put it:

> 'So it is really about striking the right balance between the controls you have in place and the expectations for growth, and then also build trust with the business'. (Interview A3)

Of importance for this role is the building of trust with the business. Indeed, one of the ways anti-corruption government is thought of is as a culture of communication between individual and departmental parts of the organization. As a compliance officer explains, a way of gaining trust is by providing solutions which enable the company to both stay compliant but also achieve its targets:

> 'So we looked at those areas and really thought where the risk is coming from and where we could have a more feasible solution. We came up with these solutions because we hired capable people and these people build trust base relationship with our business team. So they had these discussions and came up with solutions acceptable to our parties. Last but not least we also took harsh measures where we found some violations.' (Interview A12)

A more concrete example of how this trust gets realized comes from another interviewee with experience in consulting multinational companies on how to successfully and legally compete with the alleged bribery of the market by their local competitors in China:

> 'As a foreign company you have an international brand and you should use it more. You should advocate the good quality your product has and you should advocate about your technology … especially today, with Chinese consumers no longer looking at what's the cheapest but at what's the best quality because they can afford much more. I think the foreign company should really catch these opportunities because they do have certain advantages whereas the local companies do not.' (Interview A22)

Thus, the identity of a business advisor is being used to overcome both the identity of police officer and that of sales agent by in fact imitating both. Compliance officers gain the trust of their colleagues by solving problems created by the application of a regulatory framework on the company's

operation, and by using the qualities of salesman to sell a compliance framework as a solution that will secure the company's long term survival. In the words of a compliance manager:

> 'I would say for us, the most important driver right now is actually the idea of sustainability. The idea that you are doing business with a long term perspective.' (Interview A9)

6. Conclusion

In this paper, I dealt with the broad question of how anti-corruption is thought of in corporations. Taking my departure in government analytics, I sought to unearth the implicit strategy and logic of anti-corruption as a regime of practices informed and shaped by explicit bodies of knowledge such as compliance, business ethics, and risk management. The data for this effort were collected through semi-structured interviews with compliance officers and their analysis offered evidence on how anti-corruption becomes visible and delimited in the organization, setting the scene for the rationality of self-responsibility promoted by compliance officers who consider themselves as business advisors. The combination of the latter two elements of the anti-corruption strategy, however, implies a blurry orientation of anti-corruption in which one element contradicts the other. In particular, the rationality of self-responsibility sides well with the application of anti-corruption as compliance and business ethics because it seeks to eliminate (ideally) corruption proactively. It contradicts, however, risk management since the latter is based on collective responsibility. In contrast, the practice of anti-corruption by compliance officers who consider themselves as business advisors is closer to the risk management program since its goal is to collectively manage and organize anti-corruption instead of eliminating it through judicial and ethical incentives advanced by the compliance and business ethics programs respectively. I argued that this tension is caused by the inconclusiveness of practice and research regarding the causes of corruption.

Corruption has been attributed to, among other things, individual motives, group mentalities, as well as organizational, cultural, international economic and national factors, all based on valid argumentation and evidence. However, it is quite difficult to decisively pin down corruption to a single cause simply because regardless of the evidence, corruption is secretive and takes place under privacy (Everett, Neu & Rahaman., 2006). In other words, the exact workings of corruption, regardless of how common it may seem in some cases, it is not so clear after all. A reasonable and

practical way to deal with this issue from a policy perspective is to offer adequate guidance so to cover as many aspects of corrupt behavior as possible. That is probably why the corruption control measures prescribed by national and international public and private authorities offer such a variety of tools and reasonings. Some find this an appropriate reaction to the problem of corruption. Everett et al., for example, point out, that there are different kinds of corruption, and thus different intervention methods may be required. Others seems less tolerant, however, and go a step further by arguing that we have failed to understand corruption empirically and it may be best to examine it theoretically (Breit, Lennerfors & Olaison, 2015).

Anti-corruption usually refers to 'internal rules and procedures aimed at preventing and detecting, as well as remedying and/or reporting corrupt activities' (Jorge & Basch, 2013, p. 166) implying that the objective of anti-corruption is the elimination of corruption through prevention. Regardless of whether corruption is seen as an individual or organizational phenomenon (Pinto et al., 2008), the control of people's behavior individually and collectively is deemed as most crucial for anti-corruption (Hauser, 2018; Paine, 1994). This has been more or less the logic behind both business ethics and compliance approaches no matter their differences otherwise. Indeed, any reasonably made corporate CoC starts with the statement that the company does not tolerate any kind and form of corruption though this may not be enough (Gorta, 2013). Likewise, if we take business ethics as a paradigm, the establishment of a corporate culture of integrity has as its objective a proactive approach to countering corruption (Warren et al., 2014).

Self-responsibility therefore appears as the key objective that will deem an organization corruption-free. If all people abide by the same authoritative or moral code that forbids misbehavior then corruption will vanish as a phenomenon. In order for this to happen, people need to possess some sort of expertise on what corruption and anti-corruption is, meaning that they need to be able to identify problematic cases and find solutions as well (Hauser & Hogenacker, 2014; Ruiz et al., 2015).

The same cannot be argued, however, about anti-corruption and risk management; risk management builds on the perception that corporate operation necessarily creates risks (Becker, Hauser & Kronthaler, 2013) and therefore their elimination is not a realistic target. What can be done is that these risks can be managed or organized collectively depending on corporate strategy and risk appetite (Aven, 2013; Power, 2007). In order for risks and anti-corruption to be managed collectively,

then a robust internal system of reporting needs to be in place so the corporation is aware of the risks taken (Miceli & Near, 2002). The responsibility of the person, therefore, is not to avoid or deal with misbehavior but rather to report it. This is a significant difference I argue for anti-corruption in corporations since it points to different roles and meanings of its practice.

Likewise, anti-corruption as practiced by compliance officers who consider themselves as *business advisors* points to similar argumentation regarding the anti-corruption regime of practices and its orientation. If the desired outcome is to 'speak up' and report cases of misbehavior then the role of compliance officers is adjusted to that reality, meaning that they offer advice on what would be most suitable and manageable for the business approach to a risky situation. This is why the role of compliance officers has developed from 'corporate cop' and ethics 'sales agent' to business advisor. In other words, what makes a compliance officer different from their colleagues in the legal department or internal audit is that they offer mitigation strategies. To mitigate a risk means to take the necessary measures to reduce 'the extent of exposure to a risk and/or the likelihood of its occurrence' (BusinessDictionary.com, 2019). Indeed, as others have pointed out, 'When economists or business people talk about 'managing risk they do not mean eliminating it entirely' (Garland, 2003, p. 68). But in doing so, morality and the benevolent objective of treating corruption and its adverse consequences in social and corporate terms is ruled out by definition in favor of an 'everything goes' mentality including the confidence that corruption is manageable (David-Barrett et al., 2017). This means that the attentiveness on managing the risk of corruption rather than eliminating it excludes notions of integrity and dedication to anti-corruption rules found in business ethics and compliance programs.

This is not to say, however, that because one objective is prioritized the other is totally excluded; rather it becomes an instrument serving a different goal. In the case of risk management, for example, both compliance and business ethics turn from being ends to mediums. Rules are required for reporting and managing risks and it is the corporate leadership setting these rules and the risk appetite of the company. Likewise, ethics can be a very useful incentive for employees to buy-in to the whole risk approach. In a similar vein, risk management becomes a medium for business ethics and compliance approaches at least when 'red flags' need to be recognized or to the organization of anti-

corruption since it allows resources to be allocated properly and according to risk likelihood and assessment.

It is not this paper's intention to advance a certain way for anti-corruption to be practiced. As an observer and student of anti-corruption, however, I would like to draw attention to the different possibilities, orientations, and potential outcomes such differentiations lead to. As Slager (2017, p. 380) wrote recently, though in a more direct way, 'all actors and organizations involved in fighting corruption would do well to critically evaluate the implications of using risk discourse in the anti-corruption regime'.

References

Adelstein, J., & Clegg, S. (2016). Code of Ethics: A Stratified Vehicle for Compliance. *Journal of Business Ethics*, *138*(1), 53–66.

Adler, P. S., & Borys, B. (1996). Two Types of Bureaucracy: Enabling and Coercive. *Administrative Science Quarterly*, *41*(1), 61–89.

Amernic, J., & Craig, R. (2013). Leadership Discourse, Culture, and Corporate Ethics: CEO-speak at News Corporation. *Journal of Business Ethics*, *118*, 379–394.

Andersen, T. J., Garvey, M. L., & Roggi, O. (2014). *Managing risk and opportunity : the governance of strategic risk-taking*. Oxford: Oxford UP.

Ardichvili, A., Mitchell, J. A., & Jondle, D. (2009). Characteristics of ethical business cultures. *Journal of Business Ethics*, *85*(4), 445–451.

Arena, M., Arnaboldi, M., & Azzone, G. (2010). The organizational dynamics of Enterprise Risk Management. *Accounting, Organizations and Society*, *35*, 659–675.

Arthur, W., Bennett, W., Edens, P. S., & Bell, S. T. (2003). Effectiveness of training in organizations: A meta-analysis of design and evaluation features. *Journal of Applied Psychology*, *88*(2), 234–245.

Ashforth, B. E., & Anand, V. (2003). The normalization of corruption in organizations. *Research in Organizational Behavior*, *25*, 1–52.

Aven, T. (2013). On the Meaning and Use of the Risk Appetite Concept. *Risk Analysis*, *33*(3), 462–468.

Beck, U. (1992). *Risk Society: Towards a New Modernity*. *Society*. London: Sage Publications.

Becker, K., Hauser, C., & Kronthaler, F. (2013). Fostering management education to deter corruption: What do students know about corruption and its legal consequences? *Crime, Law and Social Change*, *60*(2), 227–240.

Biegelman, D. R., & Biegelman, M. T. (2010). *Foreign corrupt practices act compliance guidebook : protecting your organization from bribery and corruption*. Hoboken, New Jersey: John Wiley and Sons Inc.

Biegelman, M. T., & Biegelman, D. R. (2008). *Building a world-class compliance program : best practices and strategies for success*. John Wiley & Sons.

Bogner, A., & Menz, W. (2009). The Theory-Generating Expert Interview: Epistemological Interest, Forms of Knowledge, Interaction. In *Interviewing Experts* (pp. 43–80). London: Palgrave Macmillan UK.

Bondy, K., Matten, D., & Moon, J. (2008). Multinational corporation codes of conduct: Governance tools for corporate social responsibility? *Corporate Governance: An International Review*, *16*(4), 294–311.

Breit, E., Lennerfors, T., & Olaison, L. (2015). Critiquing corruption : A turn to theory. *Ephemera : Theory and Politics in Organization*, *15*(2), 319–336.

Bromiley, P., Mcshane, M., Nair, A., & Rustambekov, E. (2014). Enterprise Risk Management: Review, Critique, and Research Directions. *Long Range Planning*, *48*, 265–276.

Business Insider. (2012). 20 Qualities That Make A Great Salesperson. Retrieved August 16, 2018, from https://www.businessinsider.com/20-qualities-that-make-a-great-salesperson-2012-5?r=US&IR=T&IR=T

BusinessDictionary.com. (2019). What is risk mitigation? definition and meaning - BusinessDictionary.com. Retrieved July 11, 2019, from http://www.businessdictionary.com/definition/risk-mitigation.html

Callon, M., Law, J., & Rip, A. (Eds.). (1986). *Mapping the Dynamics of Science and Technology*. Houndmills,Basingstoke, Hampshire RG212XS: The MacMillan Press LTD.

Dashwood, H. S. (2012). *The Rise of Global Corporate Social Responsibility*. Cambridge: Cambridge University Press.

David-Barrett, E., Yakis-Douglas, B., Moss-Cowan, A., & Nguyen, Y. (2017). A Bitter Pill? Institutional Corruption and the Challenge of Antibribery Compliance in the Pharmaceutical Sector. *Journal of Management Inquiry*, *26*(3), 326–347.

De George, R. T. (1987). The Status of Business Ethics: Past and Future. *Journal of Business Ethics*, *6*, 201–211.

Dean, M. (2009). *Governmentality: Power and Rule in Modern Society,* (2nd ed.). London: SAGE Publications Inc.

Dean, M. (2010). *Governmentality: Power and Rule in Modern Society* (2nd ed.). London: SAGE Publications Ltd.

Eichar, D. M. (2017). *The rise and fall of corporate social responsibility*. *The Rise and Fall of Corporate Social Responsibility*. Routledge.

Erwin, P. M. (2011). Corporate Codes of Conduct: The Effects of Code Content and Quality on Ethical Performance. *Journal of Business Ethics*, *99*(4), 535–548.

Everett, J., Neu, D., & Rahaman, A. S. (2006). The global fight against corruption: A foucaultian, virtues-ethics framing. *Journal of Business Ethics*, *65*(1), 1–12.

Ferrell, O. C., LeClair, D. T., & Ferrell, L. (1998). The Federal Sentencing Guidelines for Organizations: A Framework for Ethical Compliance. *Journal of Business Ethic*, *17*(353–363).

Foucault, M. (1991). Politics and the Study of Discourse. In G. Burchell, C. Gordon, & P. Miller (Eds.), *The Foucault effect : studies in governmentality : with two lectures by and an interview with Michel Foucault* (p. 307). Chicago: University of Chicago Press.

Foucault, M. (1995). *Discipline and Punish: The Birth of the Prison*. (A. Sheridan, Ed.) (2nd ed.). New York: Vintage Books.

Freeman, E. H., MCP, & MCT. (2007). Regulatory Compliance and the Chief Compliance Officer. *Information Systems Security*, *16*, 357–361.

Garland, D. (1997). "Governmentality" and the problem of crime: Foucault, criminology, sociology. *Theoritical Criminology*, *1*(2), 173–214.

Garland, D. (2003). The Rise of Risk. In R. V. Ericson & Aa. Doyle (Eds.), *Risk and Morality* (p. 461). Toronto: University of Toronto Press.

Goebel, S., & Weißenberger, B. E. (2017). The Relationship Between Informal Controls, Ethical Work Climates, and Organizational Performance. *Journal of Business Ethics*, *141*(3), 505–528.

Goodpaster, K. E. (1996). Business ethics. In P. H. Werhane & R. E. Freeman (Eds.), *The Blackwell encyclopedic dictionary of business ethics* (pp. 51–57). Cambridge, MA: Blackwell.

Gordon, C. (Ed.). (1980). *Power/Knowledge: Selected interviews & other writings 1972-1977 by Michel Foucault*. New York: Pantheon Books.

Gorta, A. (2013). Research: A tool for building corruption resistance. In P. Larmour & N. Wolanin (Eds.), *Corruption and Anti-Corruption*. ANU E Press-Australian National University.

Gottschalk, P. (2011). *Corporate social responsibility, governance and corporate reputation*. *Corporate Social Responsibility, Governance and Corporate Reputation*. Singapore: World Scientific Publishing Co Pte Ltd.

Grojean, M. W., Resick, C. J., Dickson, M. W., & Smith, D. B. (2004). Leaders , Values , and Organizational Climate : Examining Leadership Strategies for Establishing an Organizational Climate regarding Ethics and Organization. *Journal of Business Ethics*, *55*, 223–241.

Hansen, H. K. (2011). Managing corruption risks. *Review of International Political Economy*, *18*(2), 251–275.

Hansen, H. K. (2012). The power of performance indices in the global politics of anti-corruption. *Journal of International Relations and Development*, *15*(4), 506–531.

Hansen, H. K., & Stachowicz-Stanusch, A. (2013). Varieties of corruption control: Introduction to special issue. *Crime, Law and Social Change*, *60*(2), 115–126.

Hardy, C., & Maguire, S. (2016). Organizing risk: Discourse, power, and "riskification." *Academy of Management Review*, *41*(1), 80–108.

Hauser, C. (2018). Fighting Against Corruption: Does Anti-corruption Training Make Any Difference? *Journal of Business Ethics*, *159*, 1–19.

Hauser, C., & Hogenacker, J. (2014). Do firms proactively take measures to prevent corruption in their international operations? *European Management Review*, *11*(3–4), 223–237.

Healy, M., & Iles, J. (2002). The establishment and enforcement of codes. In *Journal of Business Ethics* (Vol. 39, pp. 117–124).

Integrity, O. (1994). Managing for Organizational. *Harvard Business Review*, *5*(March-April), 1–26. Retrieved from https://hbr.org/1994/03/managing-for-organizational-integrity

Jorge, G., & Basch, F. F. (2013a). How has the private sector reacted to the international standard against transnational bribery? Evidence from corporate anticorruption compliance programs in Argentina. *Crime, Law and Social Change*, *60*(2), 165–190.

Jorge, G., & Basch, F. F. (2013b). How has the private sector reacted to the international standard against transnational bribery? Evidence from corporate anticorruption compliance programs in Argentina. *Crime, Law and Social Change*, *60*(2), 165–190.

Kaptein, M. (2004). Business Codes of Multinational Firms: What Do They Say? *Journal of Business Ethics*, *50*(1), 13–31.

Kaptein, M. (2015). The Effectiveness of Ethics Programs: The Role of Scope, Composition, and Sequence. *Journal of Business Ethics*, *132*(132), 415–431.

Kaptein, M., & Schwartz, M. S. (2007). The Effectiveness of Business Codes: A Critical Examination of Existing Studies and the Development of an Integrated Research Model. *Journal of Business Ethics*, *77*, 111–127.

Kaufman, B. E. (1999). Expanding the Behavioral Foundations of Labor Economics. *ILR Review*, *52*(3), 361–392.

Kenyon, W. (2013). Diagnosing Bribery Risk Guidance For the Conduct of Effective Bribery Risk Assessment. Retrieved from https://transparency-france.org/wp-content/uploads/2016/04/Diagnosing_Bribery_Risk-1.pdf

Kish-Gephart, J. J., Harrison, D. A., & Treviño, L. K. (2010). Bad Apples, Bad Cases, and Bad Barrels: Meta-Analytic Evidence About Sources of Unethical Decisions at Work. *Journal of Applied Psychology*, *95*(1), 1–31.

Kvale, S. (1996). *Interviews : an introduction to qualitative research interviewing*. London: Sage Publications.

Lambsdorff, J. G. (2009). The Organization of Anti-Corruption: Getting Incentives Right. In I. R. Rotberg (Ed.), *Corruption, Global Security and World Order* (pp. 389–415). Brookings Institution Press.

Lemke, T. (2002). Foucault, Governmentality, and Critique. *Rethinking Marxism*, *14*(3), 49–64.

Levine, M. P., & Boaks, J. (2014). What Does Ethics Have to do with Leadership? *Journal of Business Ethics*, *124*(2), 225–242.

Meuser, M., & Nagel, U. (2009). The Expert Interview and Changes in Knowledge Production. In A. Bogner, B. Littig, & W. Menz (Eds.), *Interviewing Experts* (pp. 1–42). London: Palgrave Macmillan.

Miceli, M. P., & Near, J. P. (2002). What makes whistle-blowers effective? Three field studies. *Human Relations*, *55*(4), 455–479.

Miller, P., & Rose, N. (2008). *Governing the present: Administering economic, social and personal life*. Cambridge: Polity Press.

Minkes, L. A., Small, M. W., & Chatterjee, S. R. (1999). Leadership and Business Ethics: Does It Matter? Implications for Management. *Journal of Business Ethics*, *20*, 327–335.

Miska, C., & Mendenhall, M. E. (2018). Responsible Leadership: A Mapping of Extant Research and Future Directions. *Journal of Business Ethics*, *148*(1), 117–134.

New York Times. (2008). At Siemens, Bribery Was Just a Line Item - The New York Times. Retrieved November 16, 2018, from https://www.nytimes.com/2008/12/21/business/worldbusiness/21siemens.html?pagewanted=all

Nygaard, A., Biong, H., Silkoset, R., & Kidwell, R. E. (2017). Leading by Example: Values-Based Strategy to Instill Ethical Conduct. *Journal of Business Ethics*, *145*(1), 133–139.

Paine, L. S. (1994). Managing for organizational integrity. *Harvard Business Review*, *72*(2), 106–117.

Palmer, D. E., & Zakhem, A. (2001). Bridging the gap between theory and practice: Using the 1991 Federal Sentencing Guidelines as a paradigm for ethics training. *Journal of Business Ethics*, *29*(1–2), 77–84.

Pasricha, P., Singh, B., & Verma, P. (2017). Ethical Leadership, Organic Organizational Cultures and Corporate Social Responsibility: An Empirical Study in Social Enterprises, 1–18.

Pinto, J., Leana, C. R., & Pil, F. K. (2008). Corrupt organizations or organizations of corrupt individuals? two types of organization-level corruption. *Academy of Management Review*, *33*(3), 685–709.

Power, M. (2004). The risk management of everything. *The Journal of Risk Finance*, *5*(3), 58–65.

Power, M. (2007). *Organizing Uncertainty: Designing a world of risk management*. Oxford: Oxford University Press.

Ritchie, J., Lewis, J., & El am, G. (2003). Designing and Selecting Samples. In J. Ritchie & J. Lewis (Eds.), *Qualitative research practice : A Guide for Social Science Students and Researchers*. London: SAGE Publications.

Rose, C. (2012). The UK Bribery Act and accompanying guidance: Belated implementation of the OECD Anti-bribery Convention. *The International and Comparative Law Quarterly*, *61*(2), 485–499.

Rose, N. (1999). *Powers of freedom: reframing political thought*. Cambridge: Cambridge University Press.

Rose, N. (2004). *Powers of freedom: Reframing political thought*. Cambridge: Cambridge University Press.

Rose, N., & Miller, P. (1992). Political Power beyond the State : Problematics of Government. *The British Journal of Sociology*, *43*(2), 173–205.

Ruiz, P., Martinez, R., Rodrigo, J., & Diaz, C. (2015). Level of Coherence Among Ethics Program Components and Its Impact on Ethical Intent. *Journal of Business Ethics*, *128*(4), 725–742.

Saldana, J. (2009). *The Coding Manual for Qualitative Researchers* (1st ed.). London: SAGE Publications.

Sampson, S. (2016). The "Right Way": Moral Capitalism and the Emergence of the Corporate Ethics and Compliance Officer. *Journal of Business Anthropology*, (Special Issue 3), 65–86.

Sarbanes-Oxley Act. (2002). H.R.3763 - 107th Congress (2001-2002): Sarbanes-Oxley Act of 2002 | Congress.gov | Library of Congress. Retrieved November 21, 2019, from https://www.congress.gov/bill/107th-congress/house-bill/3763

Schaubroeck, J. M., Hannah, S. T., Avolio, B. J., Kozlowski, S. W. J., Lord, R. G., Treviño, L. K., … Peng, A. C. (2012). Embedding ethical leadership within and across organizational levels. *Source: The Academy of Management Journal*, *55*(5), 1053–1078.

Schiller, F., & Prpich, G. (2014). Learning to organise risk management in organisations: what future for enterprise risk management? *Journal of Risk Research*, *17*(8), 1366–9877. Retrieved from http://www.tandfonline.com/action/journalInformation?journalCode=rjrr20

Schwartz-Shea, P., & Yanow, D. (2012). The Rhythms of Interpretive Research II: Understanding and Generating Evidence. In *Interpretive Research Design: Concepts and Processess* (Routledge). New York: Routledge.

Schwartz, M. S. (2001). The Nature of the Relationship between Corporate Codes of Ethics and Behaviour. *Journal of Business Ethics*, *32*(4), 247–262.

Schwartz, M. S. (2004). Effective Corporate Codes of Ethics: Perceptions of Code Users. *Journal of Business Ethics*, *55*, 323–343.

Schwartz, M. S. (2013). Developing and sustaining an ethical corporate culture: The core elements. *Business Horizons*, *56*(1), 39–50.

Shamir, R. (2008). The age of responsibilization: on market-embedded morality. *Economy and Society*, *37*(1), 1–19.

Siltaoja, M., Malin, V., & Pyykkönen, M. (2015). "We are all responsible now": Governmentality and responsibilized subjects in corporate social responsibility. *Management Learning*, *46*(4), 444–460.

Sims, R. R. (2000). Changing an Organization ' s Culture Under New Leadership. *Journal of Business Ethics*, *25*(May), 65–78.

Singh, J. B. (2011). Determinants of the Effectiveness of Corporate Codes of Ethics: An Empirical Study. *Journal of Business Ethics*, *101*, 385–395.

Slager, R. (2017). The Discursive Construction of Corruption Risk. *Journal of Management Inquiry*, *26*(4), 366–382.

Stevens, B. (2008). Corporate Ethical Codes: Effective Instruments For Influencing Behavior. *Journal of Business Ethics*, *78*, 601–609.

Strauss, A. L. (1987). *Qualitative analysis for social scientists*. *Qualitative analysis for social scientists*. Cambridge: University of Cambridge.

Thomas, T., Schermerhorn, J. R., & Dienhart, J. W. (2004). Strategic Leadership of Ethical Behavior in Business [and Executive Commentary]. *The Academy of Management Executive*, *18*(2), 56–68.

Toor, S. ur R., & Ofori, G. (2009). Ethical Leadership: Examining the Relationships with Full Range Leadership Model, Employee Outcomes, and Organizational Culture. *Journal of Business Ethics*, *90*(4), 533–547.

Velasquez, M. G. (2014). *Business ethics: Concepts and cases* (7th ed., Vol. 111). Essex: Pearson.

Verhezen, P. (2010). Giving Voice in a Culture of Silence. From a Culture of Compliance to a Culture of Integrity. *Journal of Business Ethics*, *96*(2), 187–206.

Verma, P., Mohapatra, S., & Löwstedt, J. (2016). Ethics Training in the Indian IT Sector: Formal, Informal or Both? *Journal of Business Ethics*, *133*, 73–93.

Warren, D. E., Gaspar, J. P., & Laufer, W. S. (2014). Is Formal Ethics Training Merely Cosmetic? A Study of Ethics Training and Ethical Organizational Culture. *Business Ethics Quarterly*, *24*(1), 85–117.

Weaver, G. R., & Treviño, L. K. (1999). Compliance and Values Oriented Ethics Programs: Influences on Employees' Attitudes and. *Business Ethics Quarterly*, *9*(2), 315–335.

Weber, J. (2006). The New Ethics Enforcers. Retrieved August 15, 2018, from https://www.bloomberg.com/news/articles/2006-02-12/the-new-ethics-enforcers

Webley, S., & Werner, A. (2008). Corporate codes of ethics: necessary but not sufficient. *Business Ethics: A European Review*, *17*(4), 405–415.

Yeoh, P. (2012). Bribery Act 2010: implications for regulated firms. *Journal of Financial Regulation and Compliance*, *20*(3), 264–277.

Paper 3: Anti-corruption in practice

ABSTRACT

Anti-corruption has emerged as a global norm and prohibition regime during the last decades. I argue that much can be learned about anti-corruption if we develop a practice approach attentive to its social infrastructure. In this paper, I build on International Practices theory, and I analyze four regular but not exclusive to anti-corruption practices namely anti-corruption conferencing, certifying expertise, monitoring implementation, and public-private partnering. I utilized a praxiographic approach to collect data through expert interviews, participant observation, and document analysis. I demonstrate the intended as well as unintended consequences of practicing anti-corruption. Along with the creation of a collective identity, professionalization, isomorphism, and cooperation norm-based approaches prioritize, this study shows that anti-corruption is also 'built' on elitism, self-interest, resistance, and blurred responsibilities. By fleshing out these phenomena, a more realistic and holistic understanding of anti-corruption is revealed. Moreover, in contrast with what one might expect, unintended consequences are not necessarily unwanted or alien to the practice of anti-corruption but rather are supportive and constitutive of it.

1. Introduction

Anti-corruption has drawn the attention of both academics and practitioners over the last 40 years. In particular, lots of attention has been put on anti-corruption as a global norm and regime (Getz, 2006; McCoy & Heckel, 2001; Weber & Getz, 2004), its development (Jakobi, 2013a; Nadelmann, 1990) and transformation into a prosperous 'industry' (Sampson, 2010) influencing domestic legislation (Rose, 2015). In this line of thought others have analyzed anti-corruption as enforcement, self-regulatory, and hybrid mechanisms (Lord, 2013), as a risk to be managed (Hansen, 2011), as well as how corruption risk is socially and discursively constructed (Breit, 2010; Slager, 2017).

Crucial to the analysis of anti-corruption as a norm are landmark events and achievements. Starting with the US Foreign Corrupt Practices Act (FCPA) in the late 1970s which introduced anti-corruption in the international arena, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (OECD Convention), and the UN Convention against corruption (UN Convention) in the 1990s and 2000s respectively which consolidated anti-corruption as an international problem (Pacini, Swingen, & Rogers, 2002), as well as the role of Transparency International (T.I) and its Corruption Perceptions Index (CPI) in spreading the anti-corruption movement globally (Hansen, 2012; Jakobi, 2013a). More recently, the UK Bribery Act of 2010 has also been considered as a landmark in the fight against corruption by introducing the failure to prevent corruption as an offence (Yeoh, 2012) .

The focus on norms and regimes, however, tends to obscure the myriad of everyday practices that constitute social order (Adler & Pouliot, 2011a; Doty, 1996). Norm-based approaches to anti-corruption focus on institution and regime-building and its deterministic effect on actors (McCoy & Heckel, 2001) and as a result ignore a range of usually informal activities that take place regularly in the performance of anti-corruption. For example, conventions like the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (OECD Convention) have drawn the attention of scholars as significant events in anti-corruption because they popularized and criminalized bribery (Pacini et al., 2002) or established the norm of anti-corruption (Jakobi, 2013a). Rarely, however, have scholars looked into the regular practice of 'monitoring the implementation of such treaties' through which the OECD Convention and their objectives have been expressed and instantiated.

To address this lack of focus on the 'social infrastructure' of anti-corruption (Pouliot & Thérien, 2017, p. 163), I study four practices regularly, but not exclusively, met in anti-corruption namely, *conferencing*, *certifying expertise*, *monitoring progress*, and *public-private partnering*. For each of these practices, I discuss its development, practice, and intended and unintended consequences. Taking the public-private partnering practice as an example, I discuss how such a partnering came about as a remedy to the problem of corruption in certain cases by uniting traditionally opposing public and private authorities but at the same time blurring the boundaries and responsibilities of these authorities.

Building on international practice theory (Adler & Pouliot, 2011b; Bueger & Gadinger, 2015), I suggest that besides norms and rules and their institutional gravity, anti-corruption consists also of typical and often unwritten practices meant as 'socially organized and meaningful patterns of activities that tend to recur over time' (Pouliot & Thérien, 2017, p. 163). Practices allow the study of social phenomena by situating the focus on interests, norms, and ideas to the 'material' that makes the world 'hang together', by highlighting the everyday habitual activities of practitioners reproducing the social and political realms (Bueger & Gadinger, 2014). The object of analysis in this paper is these regular and subtle activities and ways anti-corruption is practiced in international and national contexts and which are usually obscured by the brightness of major events and landmarks of anti-corruption.

A practice approach offers three theoretical contributions. First, in approaching anti-corruption from a practice perspective, I show that anti-corruption is more dynamic as a process than one would expect and that it involves more action on behalf of a variety of actors. It becomes possible then to study the doings of these actors and to understand how anti-corruption is actually socially constructed through the recursive nature of such practices (Slager, Gond, and Moon, 2012). Second, it allows for the analysis of the politics of anti-corruption beyond the state (Pouliot & Thérien, 2017). That is to say, the practices of anti-corruption under study are not and should not be seen as the outcome of a single agent's action, 'but that of a community of representatives whose members enter in patterned relations, within an organized social context, thanks to similar background dispositions' (Adler & Pouliot, 2011a, p. 10). My study of anti-corruption reveals, therefore, the variety of actors underpinning anti-corruption as it includes not just rule-makers but also users and third parties. Third,

the paper highlights the intended and also the often neglected unintended consequences of these patterned relations. In contrast with what one would expect, unintended consequences are not necessarily unwanted or alien to the practice of anti-corruption (Merton, 1936) but rather are supportive of it. A practice approach thus sheds light on both the written and unwritten ways of doing anti-corruption.

In the following section, I briefly review the anti-corruption literature and I argue that a focus on anti-corruption as a global norm and regime obscures its social infrastructure. As a consequence, the next chapter is dedicated to the concept of practices, its methodology, and I also provide information on the empirical cases I utilized. These cases are not indicative, exemplar, or representative of a larger number of cases but rather indicative as to what the study of practices can offer in the study of anti-corruption and social phenomena more broadly. In other words, what can be generalized from this study is not necessarily the findings (although this might be the case as well) but the method. Hence, the choice of Denmark as the main locale to draw cases from reflects reasons of convenience and not a peculiar, extreme, or even regular case study. In section four, I analyze the four practices and I conclude by discussing their intended and unintended consequences, their importance, as well as arguing for the merits of using a practice approach in the study of anti-corruption.

2. Anti-corruption as a global norm

One of the first works in international relations literature to conceptualize anti-corruption as an emerging norm was Nadelmann's (1990) study on global prohibition regimes. Global prohibition regimes are institutionalized norms which prohibit state and non-state actors from performing particular activities. A precondition for the formation of a global prohibition regime is that the criminal activities of concern should transcend national borders and in so doing reduce also the ability of a single state to act unilaterally. Through a five-stage norm development process, Nadelmann, explains how from relatively weak and mostly domestic activity, 'transnational moral entrepreneurs' lead to the consolidation of such regimes. Regimes in turn have been classified by their scope as global, regional, or associative, or based on the functional domain depending on the activity, problem, or industry with which they are concerned (Preston & Windsor, 1992). Anti-corruption belongs to the latter category of regimes as a norm concerning a specific function of international business. Indeed, by the start of the 21st century, scholars pointed out that a global anti-corruption norm had

emerged (Abbott & Snidal, 2002; Andreas & Nadelmann, 2006; Getz, 2006; McCoy & Heckel, 2001; Webb, 2005). Getz (2006), for instance, reviewed its emergence and reached similar conclusions with Nadelmann (1990) in that its effectiveness rests with the complexity of the problem at hand; as an activity that takes place under privacy, corruption is unlikely to be completely eliminated by the anti-corruption regime.

A significant number of scholars focus on the role of state legislation in the establishment of the anti-corruption regime (Darrough, 2010; Lord, 2013; Mark, 2012; Weismann, 2009; Yeoh, 2012). Some highlight the influence of the US government and other critical states in forming a homogenized crime governance (Andreas & Nadelmann, 2006; Jakobi, 2013b). Jakobi (2013a), for example, sees similarities between the development of the anti-corruption and anti-money laundering regimes in that in both cases the US government's efforts were crucial for the initiation of the regimes. In a similar vein, others argue for the role of the US in global crime control (Andreas & Nadelmann, 2006). Others, however, take a more critical stance by questioning the effectiveness and sufficiency of state law enforcement. Some scholars, for instance, examine the effectiveness of the FCPA in battling corruption and conclude that it has not been an effective measure either domestically or internationally (Cragg & Woof, 2002; Darrough, 2010; Weismann, 2009; Weismann, Buscaglia, & Peterson, 2014). Similarly, Lord (Lord, 2013), argues for the limited capacity of German and the UK authorities to enforce anti-corruption due to the complexity of doing so. Nevertheless, the above studies show that more or less effective state-led legislation and enforcement play a significant role in the establishment of an anti-corruption regime.

In addition to the role of states and legislation in the anti-corruption prohibition regime, scholars agree that the emergence of the global anti-corruption norm was benefited from the mobilization of organizational platforms (Finnemore & Sikkink, 1998) including non-public and private organizations which facilitated its diffusion in global scale in the 1990s and early 2000s (Hindess, 2005; McCoy & Heckel, 2001). Jakobi (2013c, 2016), for example, emphasizes, among other things, the importance of Transparency International in pushing OECD member states to take action against corruption. In a similar line of thought, other scholars argue that the OECD Convention and the uniform set of rules it imposes on states will have a positive impact on the effectiveness of anti-corruption (Baughn, Bodie, Buchanan, & Bixby, 2010; Moran, 2003; Pacini et al., 2002). As in the

case of state legislation, however, scholars have scrutinized the actual impact of non-public organizations and their role in the anti-corruption regime. Webb (2005), for example, recognizes the UN Convention for its innovative provisions but remains skeptical with regard to the convention's real impact on corruption. Rose (Rose, 2015) examines initiatives such as the UN and OECD Conventions, the Extractive Industries Transparency Initiative (EITI), and the Financial Action Task Force (FATF), and argues that their influence on domestic legal systems varies depending on the inclusiveness each of these initiatives requires regarding their member parties.

What is central to the above analyses of the anti-corruption regime and norm is the role of *transnational moral entrepreneurs*. These can be anything from individuals, critical states, organizational platforms, and more recently private actors acting as *norm entrepreneurs* (Finnemore & Sikkink, 1998). These norm entrepreneurs mobilize popular and political support both within national borders and abroad by invoking a universal moral sense that transcends strict national interests (Nadelmann, 1990). As a result, much of the literature on anti-corruption revolves around the public and private actors, organizations, and states behind the development of the global anti-corruption norm and regime as this is reflected in a series of initiatives and landmarks of the anti-corruption regime. As Doty argues, however (1996, p. 1), the overly strong focus on regimes and institutional approaches, 'obscures the *productivity* of the *practices* that have been important aspects' of these regimes (emphasis in the original) (emphasis added).

Anti-corruption and practices as terms are not strangers to each other; anti-corruption has been analyzed as a governing practice (Hansen, 2011; Hansen & Tang-Jensen, 2015), corporate and business practice (Klinkhammer, 2013; Vincke & Heimann, 2003), enforcement and self-regulatory practice (Lord, 2013), as a neoliberal reforming program (Hindess, 2005), and industry (Sampson, 2010). Hansen and Tang-Jensen for example (2015, p. 365), 'focus on anti-corruption in-practice' by examining the deployment of technologies and assumptions made by professionals when performing the process of due-diligence. Likewise, Sampson (2010, p. 261), critically assesses 'the global institutionalisation of anti-corruptionist discourse and anti-corruption practice'. Along the same lines, Slager (2017), analyzes the use of risk discourse by accountants and how anti-corruption is constructed as a risk. She argues that a risk approach to anti-corruption ultimately demotes it from its collective and therefore social objective to an internal solution aimed to serve only the corporation.

Despite these efforts, however, an explicit effort to highlight the usefulness of a practice approach to anti-corruption as 'an integrated set of meaningful practices' is largely missing (Pouliot & Thérien, 2017, p. 364). In the following section, I discuss what an international practice is and what it brings to the study of anti-corruption.

3. International Practices

Practice theory consists of a large and diverse set of approaches of the study of social phenomena. As such, it has been increasingly used in sociological (Feldman & Pentland, 2003; Lounsbury, 2008), management (Cabantous, Gond, & Johnson-Cramer, 2010), organizational (Czarniawska & Sevon, 1996), technology (Orlikowski, 2000) and international relations (Adler & Pouliot, 2011b; Bueger & Gadinger, 2014) studies. Its history can be captured in a series of 'turns' in social theory; from the interpretive turn (Rabinow & Sullivan, 1979), to the 'practice turn in contemporary theory' (Schatzki, Cetina, & Savigny, 2001), and more recently to the 'practice turn in international relations theory' (Adler & Pouliot, 2011b; Bueger & Gadinger, 2014).

In effect, practice approaches are more an ontological position than a theory. Whereas institutional and agential theories explain the world based on norms and interests respectively, practice theorists consider practice as the core unit of analysis (Bueger & Gadinger, 2015; Reckwitz, 2002; Schatzki, 2002). This means that the focus of the researcher is redirected to discourses, ideas, norms, and interests as meaningful elements of a practice producing social order (Bueger & Gadinger, 2015). Practices are 'socially meaningful patterns of action'(Adler & Pouliot, 2011b, p. 6); they are agential in that they are constituted through the competent performance of human beings, and they are also normative in that this competent performance is patterned since it generally happens repeatedly over time as part of a socially organized context. For a performance to be competent, an audience to interpret it along similar standards and appraise it is required (Goffman, 1956). The everyday doings of anti-corruption specialists and practitioners then become the object of inquiry because it is in their doings that action and norms, discourse and materiality coexist. In so doing, practice theory advances the unveiling of previously taken for granted and subtle processes constituting social phenomena such as anti-corruption.

Unveiling these subtle processes is the first contribution a practice approach makes to anti-corruption studies. Indeed, how does what practitioners do in an organizational context relate to the global anti-corruption framework and norms? And if they do, how do these different 'levels of analysis' meet? Anti-corruption includes a diverse set of practices ranging from conferences, to attending a certification class, monitoring the implementation of international treaties, joining public-private initiatives, drafting rules, using a computer to run background checks, and generally everything people do when they perform their professional routine as anti-corruption experts. Along with written rules and procedures there is therefore an infinite number of practices that make all the above meaningful. Indeed, Hansen and Tang-Jensen (2015, p. 370), urge scholars to take a closer look at the anti-corruption *assemblage*, as an 'entanglement of heterogeneous human and non-human elements – people, objects and networks – and their formation into a field of thought and action', and unveil both its features and tensions.

The latter point brings us to the next contribution of a practice approach in anti-corruption studies, namely the intended and unintended consequences of the practice of anti-corruption (Feldman & Orlikowski, 2011). Practices are socially productive in the sense that they shape the world (Adler & Pouliot, 2011a). It is within practices where actors and the norms or interests shape their behavior interact and make social phenomena possible. These phenomena are not necessarily intended or even compatible with each other but they are tied to one another as indispensable parts of larger social phenomena such as anti-corruption. Slager (2017), for example, explains that the construction of anti-corruption as a risk crowds out other alternative concepts such as business ethics and integrity culture in the private sector. Likewise, others show how global governance practices generate both inclusionary and exclusionary effects (Pouliot & Thérien, 2017). After all, anti-corruption itself is to a certain extent a reaction to a 'bad thing' known as corruption (Walters, 2008).

This, however, takes nothing from the importance of practices and their effects as the social infrastructure of anti-corruption. By fleshing out these phenomena, a more realistic and holistic understanding of anti-corruption is revealed. This understanding does not seek to offer statistical-like generalizations but theoretical ones. As Feldman and Orlikowski argue (2011, p. 1249), statistical generalizations seek to explain universal variation whereas theoretical generalizations are better conceptualized 'as principles that can explain and guide action'. Although not generalizable a priori,

these principles can shed light on the dynamics and micro dynamics in similar though not necessarily identical situations. In light, therefore, of the increasing international and global regulations in areas such as data governance, environment, artificial intelligence, and human rights, the findings from a practice approach on anti-corruption may 'travel' to other relevant areas of inquiry (Feldman & Orlikowski, 2011).

In the following pages the four anti-corruption practices are presented and analyzed. Before we proceed, however, I must explain the methodology and the practices I have chosen to study. With regards to the methodology utilized for this study, I have followed the prescribed for practice based approaches of 'praxiography' (Bueger, 2014). Praxiography resembles to some extent traditional qualitative and interpretive methodologies since it relies heavily on expert interviews, participant observation, and document analysis. Praxiography, however, differs from traditional interpretive studies in that its goal is not the reconstruction of cultures, norms, interests or any other kind of explicit knowledge, but the reconstruction of practices. In order to do so, the focus of the collection and inquiry of data has to be on tacit or background knowledge. Interestingly, tacit knowledge cannot be transmitted through usual means such as oral or written speech or signs (Collins, 2001). As practices are considered the mediators and carriers of such knowledge, praxiographers argue that in order to understand a phenomenon, a study of its practices is required (Bueger, 2014).

For this paper, I have used a praxiographic approach to data collection consisting of expert interviews, participant observation, document analysis and desk research aiming to reconstruct the practice of anti-corruption as a 'regime of practices' (Dean, 2010) (Table 1). Interviews were conducted with anti-corruption experts in Denmark and China during 2017-18 and the experts represented a variety of industry sectors such as the pharmaceutical, information, manufacturing, energy, services, consultancies, and legal firms. What connects this diverse set of anti-corruption experts is that they were asked to describe in detail how anti-corruption is performed in multinational companies. Depending on their profession and experience, answers varied from detailed organizational insights to also detailed extra-organizational inputs. Moreover, I participated in several anti-corruption events such as certification classes, seminars and webinars, workshops as well as an anti-corruption summit. Last but not least, I collected over 500 pages of slides and documents − not all of them publicly

available − with best practices, recommendations, and guidelines on how to establish a compliance and anti-corruption function in a company.

Based on these data and fieldwork, I chose to study four common practices of anti-corruption; *conferencing*, *certifying expertise*, *monitoring progress*, *and public-private partnering*. These were chosen because they play a central, though sometimes underestimated, role in the area of business ethics and compliance; human rights, environmental protection, or anti-corruption, all seem to have similar patterns of development where the above practices take place. To be clear here, I do not claim exclusiveness in studying the above four areas of activity. The monitoring process of international treaties for examples is mentioned in several works as part of the broader study of such treaties like the OECD and UN Conventions constituting the anti-corruption regime or norm (Getz, 2006; Jongen, 2018; Rose, 2015). Likewise, public-private partnerships have been a huge area of academic work (Greve, 2010; Grimsey & Lewis, 2004; Moog et al., 2015; Rees et al., 2012). I do however claim that in my knowledge this is the first time these practices are analyzed as social practices constitutive of anti-corruption. Moreover, I chose these four practices deliberately because while it is anti-corruption experts and compliance officers who make them happen, and while these practices concern MNCs, they are not restricted as organizational function meant to operate within corporations. In contrast, they offer a broader –like infrastructure- point of view on compliance in general and anti-corruption in particular.

For each of these practices I followed an empirical case. The empirical cases are respectively, the ISO/TC 309 Plenary meeting where the new ISO 37001 Anti-bribery management systems standard was discussed; an anti-corruption certification course offered by private actors in Denmark; the OECD's Working Group on Bribery in International Business Transactions (WGIBT) and monitoring of the Danish authorities on the matter of facilitation payments; and the Fight Against Facilitation Payments Initiative (FAFPI) in Denmark. In the following pages, I discuss each one of these practices by exploring their origins and development, practice, and intended and unintended consequences (Table 1).

Practice	Definition	Empirical case	Methods
Conferencing	Social events serving the objective of bringing people with similar backgrounds and interests together to broadly speaking improve their business.	ISO/TC 309 Plenary Meeting	Participant observation, interviews
Certifying expertise	Professional training and assurance of qualifications to perform a certain task or job.	Certification master class course	Participant observation, interviews
Monitoring progress	The process by which an organizational body monitors the implementation of agreed or recommended changes in the national anti-corruption legislation of member states.	Working Group on Bribery (OECD)	Document analysis, interviews
Public-private partnering	Arrangements and cooperation between public and private authorities.	Fight Against Facilitation Payments Initiative (FAFPI)	Interviews, desk research

Table 3: Anti-corruption practices

4. Anti-corruption in practice

Anti-corruption conferencing

Conferences are social events serving the objective of bringing people with similar backgrounds and interests together to meet, and depending on the occasion discuss, negotiate, draft, cooperate, and broadly speaking improve their business (Rogers, 2008). Likewise, and depending on the occasion, the organizer, the purpose, or the participants, conferences can take different names such as convention, congress, meeting, forum, summit, assembly, initiative, and even gathering. Today, conferences play an important role in global governance (Pouliot & Thérien, 2017), and take place regularly around the world; anti-corruption is not an exception. Some indicative examples are the landmark conferences of global anti-corruption like the United Nations Convention against Corruption, and the OECD Anti-Bribery Convention, as well as the more regularly organized

International Anti-Corruption Conference (IACC), the C-5 Anti-Corruption conferences, the Annual European Compliance & Ethics Institute conferences, the IBA Anti-Corruption Conference, and the ISO 37001 & Anti-bribery Conferences to name but a few.

I take as my case the latter series of conferences and in particular the ISO/TC 309 Plenary Meeting on Anti-bribery Management Systems which I attended in 2017 in Shenzhen, China where the ISO 37001 Anti-bribery Management International Best Practice Symposium concluded. The event was organized by the Shenzhen Institute of Standards and Technology, and hosted by the International Organization for Standardization/Governance of Organizations Technical Committee (ISO/TC 309) and the Standardization Administration of the People's Republic of China. The Plenary Meeting itself intended to present but also gain feedback on the newly introduced ISO 37001 Anti-bribery management system standard from a wide pool of stakeholders.

ISO is a global network of national standards bodies with the objective to provide international standards. ISO standards are voluntary and bring together all kinds of experts from governing bodies, NGOs, to academia, business and other private entities as a depiction of expertise on common issues as variable as aircraft and space vehicles, and bribery (Timmermans & Epstein, 2010). The ISO 37001 Anti-bribery management systems is a standard introduced in 2016 with the objective to 'instill an anti-bribery culture within an organization and implement appropriate controls' (International Organization for Standardization, 2016). As the Chairperson of the Technical Committee 309 on Governance of Organizations responsible for ISO 37001 and moderator of the first session put it when opening the event, 'ISO is the global expert opinion and bribery is no exception'. Very briefly, the development of an ISO standard including 37001 on anti-bribery starts with a demand or need from the industry or any other stakeholder to the relevant Technical Committee (TC). The TC then drafts a preliminary text for discussion and deliberation with the interested national standards bodies until a consensus is reached (ISO, 2016). In the following paragraphs I present and discuss the criticism and concern that was voiced during these sessions on ISO's overly strong focus on the 'tone from the top' principle. In short, the 'tone from the top' is how anti-corruption legislation and compliance experts express the necessity and importance of organizational leadership's dedication in curbing corruption. The analysis shows how the socially organized context of conferencing enables anti-

corruption practitioners to competently perform the action of communicating and inquiring on aspects of the newly introduced the ISO 37001 Anti-bribery management systems.

I was invited to participate as a guest at the meeting on ISO 37001 by one of the Chinese delegates I had met earlier that year in Beijing. The meeting attracted more than 170 experts including representatives from the public and private sectors. The event itself was organized around four sessions namely the introduction and three rounds[7] of speakers and panelists representing local and international governmental authorities and private companies and organizations who in one way or another had engaged with deliberations on the ISO standard. After a short introduction on ISO's history and role, the development of the ISO 37001 Anti-bribery management system standard and how we reached this moment was explained in a bit more detail. The event was set up in the following way; three panels of five panelists each of them presenting to the plenum and then receiving questions. The first panel concerned the international efforts on anti-corruption, while the other two the ISO Standard and its development and implementation. Subsequently, the panels for the latter two sessions consisted of experts who had taken part in the deliberations for the creation of the standard and thus of interest for the current study. Each panel concluded with a general Q&A session where the audience had the chance to ask questions to the panelists.

Within this set up, some participants expressed their concern that the ISO standard lacked a focus on the human element of anti-corruption and compliance in organizations. According to these participants, the problem was that the standard, does not utilize or even consider the full range of people involved in cases of organizational (anti)corruption. In particular, the Director and Chief Compliance Officer (AA) of a major IT multinational company (who I sought to interview) skeptically questioned the panelists how the ISO standard accounts for the role and experience of middle managers in bribery and anti-bribery especially when considering that usually it is the middle managers who are under pressure and pass that pressure to their people to achieve unrealistic targets. The panelists replied in various capacities but along the general argument that middle managers should also be trained and that the 'tone from the top' is quite important. The debate continued in the next Q&A session when other members of the audience continued to challenge the standard's

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[7] Event sessions: 1) International Anti-corruption Effort; 2) ISO 37001 Anti-bribery Management Systems – Meeting the requirements; and 3) ISO 37001 Anti-bribery Management Systems – Certification Issues.

dependence on the 'top' to change the corporate culture by highlighting that sometimes it is the leadership which is corrupt or that other times the CEO does not really know what happens in the company and the challenges his employees face in terms of corruption. When later I met and asked AA about his insistence in criticizing ISO's 37001 overly strong focus on the 'tone from the top' principle he commented that it's important to consider in the efforts to fight corruption those who actually deal with it. The tone from the top is fine but for employees most of the time, the top is not the CEO but rather their manager; and these managers may or may not know much about anti-corruption but they may know about corrupt practices because they see a lot and we should listen to what they have to say.

The intended purpose of anti-corruption conferences is to enable communication between relevant stakeholders and audiences and initiate a dialogue and discussion on topics of common interest. In so doing, conferences also 'forge' the anti-corruption industry (Sampson, 2010) and identity as a pluralistic assemblage of public and private stakeholders similar to that we have been experiencing as global or public-private governance during the last 30 years (Börzel & Risse, 2002; Cashore, 2002; Wood & Wright, 2015). When we look closer at this assemblage, however, an unintended consequence comes forth as well; we can see that this alleged unity of what we call anti-corruption rests not only on the inclusion of as many stakeholders as possible but also on the exclusion of others the voices of whom have thus been silenced. In the above presented case the voice of middle managers was excluded and we might as well think of others like sales agents who may not had access to the deliberations. As a result, the identity of anti-corruption that is forged remains quite independent from the problem it was initially intended to solve, corruption. Indeed, as Sampson for instance (2010, p. 261) explained, the anti-corruption industry coexists 'along with the corruption it ostensibly is combating'. This new identity of anti-corruption not only has its own actors, needs, and objectives which are barely related to corruption, but does so by excluding others who may be more related to it.

Certifying anti-corruption expertise

The practice of certifying expertise concerns the professional training and assurance of qualifications to perform a certain task or job. As knowledge about corruption and anti-corruption piles up, gets institutionalized, systematized, and standardized, it also gets disseminated by public or private

educational or professional organizations and third parties in the form of professional training and certification courses (Sampson, 2010). Today, it is difficult not to notice the supply of anti-corruption, compliance, business ethics, sustainability, CSR, or risk management certification courses for professionals. What is more, the global nature of anti-corruption makes such certification processes and training in national and international levels relevant. As a result, whole industries consisting of accreditors, accountants, consultants, and certifiers have been charged with disseminating such standards (Brunsson & Jacobsson, 2002). Similar but more recent is the history of compliance and anti-corruption expertise certification. Corporate compliance rose as a profession after the introduction of the Sarbanes-Oxley Act (SOX) of 2002. SOX set the standards for a proper compliance function and therefore 'the compliance officer position was further developed into being responsible for having the right controls, education and reporting channels to increase transparency' (Gottschalk, 2011, p. 64). Other similar guiding principles on the compliance profession are the UK Bribery Act as well as the FCPA or other relevant regulations.

There are several anti-corruption training and certification courses available online but also through in-person courses. Some require personal attendance while others are online. Likewise, some require an examination to be passed while others do not. Nevertheless, most of them offer training and certification in corporate anti-corruption and compliance and related best practices. I attended one such course in Copenhagen, Denmark during 2017 to become trained and certified as a compliance-anti-corruption expert. The course consisted of six modules taught between May and September 2017 and each module was dedicated to a key aspect and function of the profession of compliance officer starting with the main legislative and regulatory anti-corruption framework, and continuing with standard compliance practices such as risk assessments and compliance governance, training and organizational buy-in, integrity due-diligence, internal investigation, and whistleblowing and crisis management.

The course attracted the attention and attendance of public, private, and corporate employees from Denmark and abroad. Some of them had already some experience in compliance while others were just starting to engage with it. Roughly one third of the participants were lawyers who saw a business opportunity in offering compliance services. Each course-day consisted of presentations and lectures from experienced anti-corruption and compliance experts from the private and public sectors, follow-

ups, discussions, and Q&A sessions where we had the opportunity to ask questions and discuss compliance matters. Each module concluded with a workshop where we had the opportunity to get hands-on experience by simulating roles in real-life based cases. With the conclusion of the modules, we were awarded a certificate confirming the completion, organizers, presenters and educational programme of the Master class. The below discussion concerns the first class we attended where the main focus was on introducing anti-corruption as profession and as a global area of regulation for companies. The analysis shows how instructors perform anti-corruption training and how this performance becomes competent as recognized as such by the participants of the course. In effect, this performance and recognition derive from the roles of instructor and student who engage in a discussion regarding the challenges of the compliance profession.

An early discussion at the course concerned the clarification of what corporate compliance and the compliance profession are about. According to the instructors, the justification of why corporations need compliance departments and officers rests with the wealth of regulations and legislations a company has to operate within. One of the organizers, for example, argued that companies neither know the regulatory framework they are operating within, nor are aware that operation in certain areas of the world is more risky for producing financial and reputational costs than others. Some more inexperienced participants followed up on this that even if one wants to be compliant, the amount of available laws and regulations on anti-corruption is a cause of confusion since it is virtually impossible to follow all of them. In light of the fact that it is very likely that governments will continue increasing regulation, the main instructor and organizer of this very first session explained that the main role of a compliance officer is to help in the company's navigation through such a challenging regulatory environment while also 'choosing' which of these regulations the company will be compliant with.

For that reason, the presenters and experts who discussed the role of compliance and compliance officer in a company insisted particularly on placing compliance fairly high in the corporate hierarchy and close to the leadership along with the finance and legal departments which are also management controls. This argument was based on a couple of rather practical conclusions drawn from the experience of the instructors; the first conclusion was that only from such a position are compliance officers legitimized to advise all levels of a company. The second conclusion was that compliance

officers are not covered by any law but rather need to be protected by the corporate leadership and internal audit committees as the gatekeepers of the company or organization on legal, ethical, and risk-related matters. As one of the instructors put it, 'it is the professionalization of compliance officers that will allow them to be heard and be taken seriously in the company and not the logic and righteousness of a cause'.

In itself, this intended development has a positive meaning; it denotes a recognition of the problem of corruption and most importantly that it requires expert knowledge to be countered. Expertise certification results to the professionalization of anti-corruption compliance by 'positioning' the compliance officer within the organization of a corporation and clarifying their role. The professionalization of anti-corruption in the private sector shows thus the maturation of anti-corruption as an organizational function to the extent that it develops into an independent status assigned with the task of ensuring compliance with both legal and ethical rules.

On the other hand, however, professionalization brings forth an unintended consequence as well. It symbolizes also the maturation of compliance officers as a professional group and therefore the rise of their self-interests. Interestingly, for example in anti-corruption certification, one has to become or be already practicing compliance before he or she can be certified as such. This raises questions as to why both are needed and if so to what end? One reason can be that by being certified and hence a member of a professional association or group, compliance officers can secure and promote the future of their newly established profession. Indeed, Tsingou (2018) has found that in the similar case of anti-money laundering compliance, officers are not only interested in following certain and well known rules, but also in shaping the governance of compliance to their own professional benefit and security. Another reason can be that as experts in their own area of corporate activity, certification allows experts to maintain some independence. Brunsson and Jacobsson (2002) point out, for instance, that experts know what is best to do but they remain responsible to no one. In this sense, what is raised as an unintended consequence of the maturity of anti-corruption is the professional self-interest and self-preservation of the certified as experts in anti-corruption compliance officers.

Monitoring anti-corruption progress

Monitoring progress is the process by which an organizational body follows up and monitors the implementation of agreed or recommended changes in the national anti-corruption legislation of its member states. A relevant example is the Organisation for Economic Co-operation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and its Working Group on Bribery in International Business Transactions (WGB), which is responsible for monitoring progress and make recommendations on the member states regarding the integration of the Convention into national legislation (OECD, 1997). According to Transparency International's website, the WGB's peer to peer monitoring process is the golden standard of monitoring and its purpose is to ensure that the signatory states conform with the Convention.

The monitoring process takes place in four successive phases; in phase 1 the adequacy of a country's legislation to implement the OECD Convention is assessed. In phase 2, the application of the current legislation is also assessed. In phase 3, the focus is on the enforcement of the OECD Convention, and in phase 4 the deliberating parties are interested in the tailored application and enforcement of the OECD Convention in the local anti-corruption legislation. In all phases, a standard procedure is followed in order for the objective to be achieved (OECD, 2019a, 2019b, 2019c). A preliminary evaluation is drafted by the WGB and sent to the country under examination in the form of a questionnaire. At the same time, two countries are appointed to act as lead examiners of the country under examination and these countries choose the experts who are to be involved in the process. Once the country under examination returns the questionnaire with its replies, the experts prepare a preliminary report on the country's progress depending on the phase and objectives. The report is discussed and evaluated by the WGB which consists of all member states of the OECD. A follow-up report follows where the examined country explains how it has addressed the Working Group's recommendations. The procedure ends with the adoption of a report and recommendations on country performance which will also be part of the subject matter of the next phase of evaluation.[8] Below we will see how the patterned relations of the actors performing the practice of monitoring anti-

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[8] For a detailed view of the evaluation process visit: https://www.oecd.org/daf/anti-bribery/countryreportsontheimplementationoftheoecdanti-briberyconvention.htm

corruption progress produce effects. Taking departure in Denmark's experience in implementing the OECD Convention in its national legislation, this section shows how the repeated interaction between Danish authorities and the OECD WGB produced on the one hand to the alignment of the Danish legislation with the OECD Convention, and on the other, resistance by the actors whose interests were affected by such changes.

The Danish Parliament (*Folketing*) amended the Danish Criminal Code in 2000 (Act No. 228 of 4 April 2000) to ensure that Denmark was compliant with- and able to ratify and implement- the OECD Convention (Langsted & Langsted, 2015). This was also the initiation point of the first phase of the monitoring process by the WGB. The amendments introduced provisions and articles aligned with the OECD Convention on a wide range of relevant areas such as the offence of bribery of foreign public officers, responsibility of legal persons, sanctions, jurisdiction, enforcement, statute of limitations, money laundering, accounting, extradition, and responsible authorities. Although the overall assessment of Denmark's status and legislation upon which the OECD Convention would be implemented was found to generally conform to the Convention's standards (WGB-Phase 1, 2000), this first phase of monitoring was concluded with some concerns including one over the use of the term 'unlawfully' in the description of the offence of bribery of public officials.[9]

According to the Danish authorities, the use of the term 'unlawfully' (uberettiget) excludes from the offence of bribery cases such as a) usual gifts, b) grants of gifts as rewards for an act already carried out without any advance promise, and c) small payments in countries where special conditions apply (WGB-Phase 1, 2000). This exclusion was meant to match Commentary 9 of the OECD Convention on small 'facilitation' payments as also corrosive but not bribes in the sense of obtaining or retaining business or other improper advantage and thus states should use good governance instead of international criminalization (OECD, 1997, p. 15). Problems arose here because according to the Danish legal tradition no definitions or explanations are offered with regards to the terminology of a law. Rather and when required Danish courts draw on the *travaux preparatoires*[10] to interpret a term.

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[9] Section 122 of the Danish Criminal Law (Danish Criminal Code, 2005) defines the offense of bribery of public officials as 'Any person who unlawfully grants, promises or offers some other person, who is working in Danish, foreign or international public service or functions, a gift or other favor in order to induce that other person to do or fail to do anything in the service, shall be liable to a fine or imprisonment for any term not exceeding three years.'

[10] *Travaux preparatoires* or 'preparatory works', are the official records and documentation of negotiations that precede a final treaty or legal text.

In the case of small facilitation payments, however, the WGB raises reservations regarding the qualification of the *travaux preparatoires* to ensure a narrow and 'under the Convention' interpretation of cases of small facilitation payments. For this reason and despite the reassurance of Danish authorities that the term 'unlawfully' will be interpreted narrowly, the WGB asserted that this matter will be monitored with regard to its implementation for its implementation in Phase 2.

Phase 2 of the WGB monitoring process of Denmark's implementation of the OECD Convention took place with a five day on-site visit of experts from the Slovak Republic and Sweden in early 2006, and included meetings of the evaluation team with representatives of Danish public, private, and civil society stakeholders. The report following phase 2 recognizes Denmark's efforts to update its legislation so to implement the Convention but urges further improvements in certain areas including the defense of small facilitation payments discussed in phase 1 (WGB-Phase 2, 2006, pp. 5, 45–49). In particular, the WGB recommends Denmark to 'clarify all instances of small facilitation payments given to induce a foreign public official to act in breach of his/her duties in the context of an international business transaction are illegal pursuant to the Danish Criminal Code' (WGB-Phase 2, 2006, p. 64). As a response to this recommendation the Danish Ministry of Justice (MOJ) published a booklet (2007) stating that such unlawful payments in the context of international business transactions were always undue and thus punishable. However, in its follow-up report of phase 2 (2008), the WGB insisted in its phase 1 suggestion that this matter should be further monitored for its application and in Danish courts.

In phase 3 and its follow up reports (2013; 2015), the WGB acknowledges some improvement but remains concerned over Denmark's progress with regards to the small facilitation payments defense. In particular, the WGB (2015) sees as a step forward the revision of the MOJ's 2007 booklet (Danish Ministry of Justice, 2007, 2015), and moreover the issuance of binding guidelines for the police and prosecutors on this matter by Denmark's Director of Public Prosecutions (DPP). However, WGB maintains that neither the revised booklet nor the new guidelines have the force of law to override the *travaux reparatoires* of the Criminal Code. The latter, accompanied with a lack of enforcement cases, led the evaluation team to consider these particular recommendations as not fully implemented and thus subject to further monitoring. Phase 4 has been scheduled to take place in 2022 (WGB-Monitoring Schedule, 2016).

Monitoring the integration and implementation of anti-corruption in national legislation contributes the most to what is known as the global anti-corruption regime and norm by aligning legislation internationally. Maybe not as effective as an actual policing-like enforcement mechanism, its influence has been nevertheless more than obvious in the behavior of business and governments at the national level (Getz, 2006; Rose, 2015). At the same time, however, the monitoring mechanism and practice feeds forms of resistance realized as delays. As the above case highlights, it may take more than 20 years of evaluations and negotiations before national legislation is aligned with the actual international treaty on anti-corruption. This could be attributed to the strong lobbying of multinational and local business that would be affected by such changes or to the reservation of governments to disrupt their business' performance environment. For instance, as one my interviewees put it when discussing the Danish government's role in anti-corruption:

> 'I think the Danish government tends to be very business oriented and pragmatic. Obviously the anti-corruption agenda is bad for business short term.' (Interview A14)

Indeed, during phase 2s on-site visit to Denmark all business representatives who met with the WGB's evaluation committee 'stated that a zero tolerance policy towards small facilitation payments was impracticable'(WGB-Phase 2, 2006, p. 14). The practice of monitoring anti-corruption process also offers intended and unintended consequences. On the one hand, it does help national legislations to fall into line with international treaties. On the other however, it also brings unintended consequences in the form of resistance by the actors who are affected the most by such alignment.

Public-private partnering against corruption

Public-private partnering (PPP) are arrangements and cooperation between public and private authorities (Greve, 2010) with the aim of countering social issues on the international or local scale (Flyverbom & Bislev, 2008; Haufler, 2003). Also known as multi-stakeholder initiatives (MSI) (Haufler, 2003; Rasche, 2012), third sector organizations (TSO) (Etzioni, 1973; Rees, Mullins, & Bovaird, 2012), or non-governmental systems of regulation (O'Rourke, 2006), such initiatives are usually seen as epitomes of cooperation and (global) governance between the public and private sectors which were for a long time considered as opponents (Thérien & Pouliot, 2006). Others point out on the practical benefits of PPPs in terms of sources of finance (Grimsey & Lewis, 2004), long-

term planning and effectiveness (Jordana & Levi-Faur, 2004), innovation (Greve, 2010), and as a method of regulating corporate conduct (Moog, Spicer, & Böhm, 2015). PPPs have been part and parcel of the government-to-governance transition widely discussed in late 1990s and early 2000s (Héritier, 2002; Reinicke, 1998). According to such discussions, a number of changes in the national and global system led policy-makers to seek assistance from the private sector.

Once more, anti-corruption has not been an exception in this development. The UN Global Compact (UNGC), the Extractive Industries Transparency Initiative (EITI) as well as local initiatives such as the Fight Against Facilitation Payments Initiative in Denmark (FAFPI) are some examples of PPPs in the area of anti-corruption. Therefore, PPPs as a mode of anti-corruption governance, depict the norm established in the mid-1990s that corruption is not only a political problem but also an economic one (Wolfensohn, 1996), and thus a responsibility of political and economic actors alike. In this sense, PPPs are offered both as a remedy for the so called retreat of governments from global social issues and also as a legitimizing vehicle for private and especially corporate actors seeking to legitimize their authority in a globalized economic system (Haufler, 2001).

In this context, the Fight Against Facilitation Payments Initiative (FAFPI)[11] came about not only as a response to the enduring problem of facilitation payments but also as a socially organized platform upon which public and private actors can work together (FAFPI, 2018). It was inspired by the practice of anti-corruption in the Danish private sector, promoted by the Confederation of Danish Industry, a collective business organization, and requires the cooperation of Danish authorities to be effective. Facilitation payments are small bribes paid to government officials to speed up the performance of a routine process to which the payer is already legally entitled (Transparency International, 2019). FAFPI's course to realization, however, was not as smooth as one would expect. A major issue, especially at the beginning of the project, was a lack of trust and incompatibility between private and public actors due to the fact that the two sectors were used to working as opponents rather than teammates. As one of the project initiators put it:

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[11] For more information on FAFPI visit: https://www.fafpi.com/

'For example, in the fight against facilitation payment initiative, one of the first things we had to consider from a business point of view was to ensure that we were not incriminating ourselves. Because, going to an authority or to public office and telling them that you know we have some problems with facilitation payments, they would probably be obliged to say 'ok we have to look into that and deep down', and that could kind of skew the whole idea of cooperation rather than we want to reveal some bad things happening.' (Interview A7)Likewise, the Danish government was also cautious in engaging with the project. The project was not only technically ambitious since it required strong IT infrastructure but also raised questions regarding the ownership and privacy of the data the Ministry of Foreign Affairs would have to handle and use. It was only when it was decided that the 18th International Anti-corruption Conference (IACC) would take place in 2018 in Copenhagen that engaged actors were motivated to overcome difficulties and push forward with the project. Indeed, FAFPI was further discussed by experts in a workshop during IACC 2018, organized by the Confederation of Danish Industry, where participants and attendees heard and voiced their opinions on the necessity for this initiative and how FAFPI can be an effort concerning all actors (IACC, 2018).

In practice theoretical terms this means that the competent performances of public and private actors were appraised differently by society. Indeed, corporations have long been considered as 'breeders' of corruption and therefore in need of regulation by state authorities (Wrage & Wrage, 2005). Similarly, governments are considered at least in the national context as the highest authorities responsible for maintaining order and safeguarding the broader social interest. In the case of FAFPI, we can see how such understandings regarding the role and activities of public and private actors have changed to consider corporations and governments as allies in fighting corruption. Consequently, FAFPI, kicked off its activities with its first meeting in early 2019 seeking to fulfil two objectives. As one of FAFPI's main supporters and promoters explained to me:

> 'So the initiative has two parts. One is the internal and how do you set up an internal system to handle and strengthen your anti-corruption program and use the network to share experience on policies like whistleblowing and training and all the other issues surrounding facilitation payments and bribery… And the other part is the external with the reporting and the ministry of foreign affairs.' (Interview A16)

As a reporting and networking tool for those companies and organizations interested in fighting facilitation payments, FAFPI seeks to fulfil two objectives. On the one hand, FAFPI, plays the role of an anti-corruption forum in which member companies share experiences about anti-corruption and facilitation payments on a regular basis. On the other hand, FAFPI collectively answers the problem of facilitation payments because it is not a problem any company or organization can deal with on its own let alone in the long-term. It offers an online reporting tool for reporting facilitation payments paid by Danish companies and organizations; first, companies need to report who, when, where, and for what purpose they paid facilitation payments. Second, once a sufficient amount of information has been gathered, it will be shared with the Danish Ministry of Foreign Affairs which will then use its diplomatic channels and influence to push local authorities to deal with the issue.

FAFPI thus approaches facilitation payments in two ways: first, it enables collective action and experience to be shared and utilized; and second, it engages local and host country public authorities in the fight against facilitation payments:

> 'It can be difficult in some situations for one individual company to always say 'no we don't want to pay', but if you stand with the whole Danish business community at your back it's much easier. You have a higher leverage basically. Also, when you stand with the ministry of foreign affairs it's even easier because they have the local contacts with the authorities in the countries where facilitation payments are an issue. Instead of just putting pressure on the local authority where the companies or organizations meet the problems, I think it makes more sense to work with the local authorities and that could be possible through the embassies and their network and contacts already.' (Interview A16)

Besides the intended contribution in providing a platform upon which public and private actors can cooperate in order to deal with corruption, the practice of anti-corruption public-private partnering brings forth some unintended consequences. Cooperation between public and private actors blurs the boundaries and consequently the responsibilities of each towards each other and society. This raises questions as to who governs and who takes responsibility for governance. The corporate power discourse of the last decades seemed to clearly position corporations in a vantage point for governance due to their supreme economic power and technological edge (Fuchs, 2007; Hall & Biersteker, 2002;

Scherer & Palazzo, 2011). However, the practice of PPP in anti-corruption shows an opposite situation to unfold whereby private companies seem to require the help of local and host-country public authorities to deal with an issue considered as economic as well for the last almost 30 years. Keeping in mind that both governments and multinational companies have been considered as the cause and solution of corruption simultaneously, one can only raise questions as to who governs anti-corruption and who is corrupt. In other words, public-private partnerships in anti-corruption offer a platform for public-private cooperation but this comes with a consequence of blurring the boundaries between the two authorities.

5. Conclusion

In this article I have sought to analyze anti-corruption from a practice perspective. This endeavor began as a response to the well-established and utilized regime approach to the study of anti-corruption, which as I have argued after reviewing the literature, 'obscures the *productivity* of the *practices* that have been important aspects' (emphasis in the original/emphasis added) (Doty, 1996, p. 1) of the anti-corruption regime. I presented and analyzed four regular, but not exclusive, to anti-corruption practices; conferencing, certifying expertise, monitoring implementation, and public-private partnering. I showed how the competent performances of anti-corruption experts within certain socially organized contexts produces both intended and unintended consequences. In the following discussion I make the argument that although unintended consequences are rather unforeseen they can be desirable (Merton, 1936) since together with the intended ones they are constitutive of the practice of anti-corruption.

The findings show that along with the intended development anti-corruption, further unintended phenomena, usually unnoticed under the influence of norms and regimes, follow (Table 2). Conferencing, for example, sets the platform for the creation of a common identity and at the same time gives space for elitism to emerge by excluding some rather focal groups for the struggle against corruption in organizations. Likewise, the professionalization of anti-corruption experts through the practice of certifying expertise is accompanied by the cultivation of their self-interest without having the possibility to ever be certain to what extent that is. On top of that, the isomorphism and uniformity

of anti-corruption regulations spread out through the practice of monitoring implementation creates opportunities of resistance for those who were left outside or unsatisfied.

Intended consequences	Unintended consequences
Collective identity	Elitism/exclusion
Professionalization	Self-interest
Uniformity/isomorphism	Resistance
Cooperation	Blurred responsibilities/roles

Table 2: Indented and unintended consequences of practicing anti-corruption

Last but not least, PPPs allow the cooperation and matching of public and private actors in the fight against corruption, but they also bring forth a blurring of the boundaries between them and their roles in society.

These unintended consequences however should not be understood as undesirable or having a necessarily negative effect (Merton, 1936) on anti-corruption by definition. Rather they should be seen as necessary elements constitutive of anti-corruption practice since they are produced and reproduced through the competent performances of practitioners. Take for example the professionalization of compliance officers and the subsequent rise of their also professional self-interest. Both of them are necessary for the endurance of anti-corruption although only the former was indeed intended by the regulations and laws upon which the profession of compliance was established. Compliance officers play an important role nowadays in anti-corruption; they are seen as government and management tools against bribery (Greenberg, 2014), shapers of rules and standards (Tsingou, 2018), as well as considered the 'moral compass of firms' shaping the governance of companies 'that need to compete in a global market where ethics may be viewed as a cost that inhibits profitability' (Sampson, 2016, pp. 65, 80).

Similarly, if we take the example of public-private partnerships and the produced intended and unintended consequences of cooperation and blurred responsibilities respectively in anti-corruption, we can see how the later enables the former and vice versa. Without blurred boundaries between the private and the public sectors meaning the detachment of each sector from their narrow roles as

regulators and regulated there would be much less cooperation. Indeed, the argumentation on the role of corporations in corruption (Baughn et al., 2010b; Calderón et al., 2009; Heineman, 2009; Rodriguez et al., 2006) matched time-wise the rise of the assumption that governments were reluctant to take on their responsibility to alleviate problems caused by globalization leaving thus space in corporations to mobilize their economic and technological power to take on responsibilities that were once considered as governmental (Hall & Biersteker, 2002; Scherer et al., 2006; Strange, 1988).

For anti-corruption studies this means first, that the use of practice theory allows our understanding of anti-corruption to go beyond levels of analysis. This becomes possible since the focus of inquiry remains with the action of practitioners of anti-corruption, but at the same time considers these actions as not properties of the mind but rather of the practice which includes among other the socially organized context and patterned relations within which such actions take place. In other words, practicing anti-corruption stops being a private matter, since it happens out of the mind, and becomes a public one (Mattern, 2011) meaning that it can also be local, national, international and global at the same time depending on the context. Indeed, Hansen and Tang-Jensen (2015), found similar patterns between the vocabulary and practices of anti-corruption professionals and the values of the anti-corruption regime. Second, and as a result of the above, anti-corruption is rather understood not as a linearly organized phenomenon, but as a multiplicity or an 'assemblage' of heterogeneous objects composed of discrete flows of other phenomena such as people, signs, chemicals, knowledge and institutions (Deleuze & Guattari, 1987; Haggerty & Ericson, 2000). In this sense, anti-corruption can neither be solely the work of 'moral' or 'norm entrepreneurs' regardless if these are individuals, governments, or other organizations, nor a norm and regime in itself (Getz, 2006; McCoy & Heckel, 2001; Nadelmann, 1990), since such views ignore a whole lot other constitutive of anti-corruption elements.

Finally, utilizing a practice approach offers great value to anti-corruption studies since it enriches its empirical pool. This is to say that along with the focus in the few important landmark events in the development of anti-corruption, scholars can as well as direct their attention to a virtually infinite number of everyday actions which constitute the practice of anti-corruption. 'Scaling down' thus to the study of practices enables not only opportunities for theoretical contributions but also empirical ones by shedding light to actions and practices usually considered by definition 'a matter of

indifference' (Callon & Latour, 1981, p. 285). Communication through e-mail and telephone for example passes rather unnoticed when talking about anti-corruption yet much of the guidance compliance officers offer to their colleagues does happen with e-mails and telephone calls. Future studies therefore should pay more attention to these everyday practices as these unfold in daily professional routines of experts and their expertise (Bogner, Littig, & Menz, 2009).

References

Abbott, K. W., & Snidal, D. (2002). Values and Interests: International Legalization in the Fight against Corruption. *The Journal of Legal Studies*, *31*(S1), 141–177.

Adler, E., & Pouliot, V. (2011a). International practices. *International Theory*, *3*(3), 1–36.

Adler, E., & Pouliot, V. (Eds.). (2011b). *International Practices*. Cambridge: Cambridge University Press.

Andreas, P., & Nadelmann, E. (2006). *Policing the globe: Criminalization and crime control in international relations*. Oxford: Oxford University Press.

Baughn, C., Bodie, N. L., Buchanan, M. A., & Bixby, M. B. (2010a). Bribery in international business transactions. *Journal of Business Ethics*, *92*(1), 15–32.

Baughn, C., Bodie, N. L., Buchanan, M. A., & Bixby, M. B. (2010b). Bribery in International Business Transactions. *Journal of Business Ethics*, *92*, 15–32.

Bogner, A., Littig, B., & Menz, W. (Eds.). (2009). *Interviewing Experts*. Palgrave Macmillan.

Börzel, T. A., & Risse, T. (2002). Public-Private Partnerships : Effective and Legitimate Tools of International Governance. *On the Reconstitution of Political Authority*, 0–22.

Breit, E. (2010). On the (Re)Construction of Corruption in the Media: A Critical Discursive Approach. *Journal of Business Ethics*, *92*, 619–635.

Brunsson, N., & Jacobsson, B. (Eds.). (2002). *A World of Standards*. Oxford: Oxford University Press.

Bueger, C. (2014). Pathways to practice: praxiography and international politics. *European Political Science Review*, *6*(03), 383–406.

Bueger, C., & Gadinger, F. (2014). *International practice theory: New perspectives*. *International Practice Theory: New Perspectives*. London: Palgrave Macmillan UK.

Bueger, C., & Gadinger, F. (2015). The Play of International Practices. *International Studies Quarterly*, *59*(3), 449–460.

Cabantous, L., Gond, J.-P., & Johnson-Cramer, M. (2010). Decision Theory as Practice: Crafting Rationality in Organizations. *Organization Studies*, *31*(11), 1531–1566.

Calderón, R., Luis, J., Lvarez-Arce, A. ´, & Mayoral, S. (2009). Corporation as a Crucial Ally Against Corruption. *Journal of Business Ethics*, *87*, 319–332.

Callon, M., & Latour, B. (1981). Unscrewing the big Leviathan: how actors macro-structure reality and how sociologists help them to do so. In K. Knorr-Cetina & A. V. Cicourel (Eds.), *Advances in Social Theory and Methodology (RLE Social Theory): Toward an Integration of Micro- and Macro-Sociologies* (pp. 277–303). London: Routledge and Kegan Paul.

Cashore, B. (2002). Legitimacy and the Privatization of Environmental Governance: How Non-State Market-Driven (NSMD) Governance Systems Gain Rule-Making Authority. *Governance*, *15*(4), 503–529.

Collins, H. M. (2001). What is Tacit Knowledge? In T. R. Schatzki, K. Knorr-Cetina, & T. Savigny Eike (Eds.), *The Practice Turn in Contemporary Theory* (pp. 115–128). New York: Routledge.

Cragg, W., & Woof, W. (2002). The U.S. Foreign Corrupt Practices Act: A Study of Its Effectiveness. *Business and Society Review*, *107*(1), 180–214.

Czarniawska, B., & Sevon, G. (Eds.). (1996). *Translating Organizational Change*. New York: de Gruyter.

Danish Criminal Code. The Criminal Code (2005). Denmark. Retrieved from https://www.unodc.org/tldb/pdf/Denmark_Criminal_Code_2005.pdf

Danish Ministry of Justice. (2007). *How to avoid corruption*. Retrieved from http://jm.schultzboghandel.dk/upload/microsites/jm/ebooks/andre_publ/corruption.pdf

Danish Ministry of Justice. (2015). *How to avoid corruption*. Retrieved from https://jm.schultzboghandel.dk/upload/microsites/jm/ebooks/andre_publ/191906 dk undgaa korruption 2015.pdf

Darrough, M. N. (2010). The FCPA and the OECD convention: Some lessons from the U.S. experience. *Journal of Business Ethics*, *93*(2), 255–276.

Dean, M. (2010). *Governmentality: Power and Rule in Modern Society* (2nd ed.). London: SAGE Publications Ltd.

Deleuze, G., & Guattari, F. (1987). *A thousand plataus: capitalism and schizophrenia*. *Deleuze & Guattari* (Translated). Minneapolis-London: University of Minnesota Press.

Doty, R. L. (1996). *Imperial Encounters: The Politics of Representation in North-South Relations*. Mineapolis: University of Minnesota Press.

Etzioni, A. (1973). The Third Sector and Domestic Missions. *Public Administration Review*, *33*(4), 314–323.

FAFPI. (2018). Home page -. Retrieved January 16, 2019, from https://www.fafpi.com/

Feldman, M. S., & Orlikowski, W. J. (2011). Theorizing Practice and Practicing Theory. *Organization Science*, *22*(5), 1240–1253.

Feldman, M. S., & Pentland, B. T. (2003). Reconceptualizing Organizational Routines as a Source of Flexibility and Change. *Administrative Science Quarterly*, *48*(1), 94.

Finnemore, M., & Sikkink, K. (1998). International Norm Dynamics and Political Change. *International Organization*, *52*(4), 887–917.

Flyverbom, M., & Bislev, S. (2008). Internet Regulation-Multi-Stakeholder Participation and Authority. In H. K. Hansen & D. Salskov-Iversen (Eds.), *Critical perspectives on private authority in global politics* (pp. 72–90). Houndsmills: Palgrave Macmillan.

Fuchs, D. (2007). *Business power in global governance*. Lynne Rienner Publishers.

Getz, K. A. (2006). The Effectiveness of Global Prohibition Regimes: Corruption and the Antibribery Convention. *Business & Society*, *45*(3), 254–281.

Goffman, E. (1956). *The presentation of self in everyday life*. *Monograph No. 2*. Edinburgh: University of Edinburgh, Social Sciences Research Centre.

Gottschalk, P. (2011). *Corporate social responsibility, governance and corporate reputation*. *Corporate Social Responsibility, Governance and Corporate Reputation*. Singapore: World Scientific Publishing Co Pte Ltd.

Greenberg, M. D. (2014). *Transforming Compliance: Emerging Paradigms for Boards, Management, Compliance Officers, and Government*. Santa Monica: Rand Corporation.

Greve, C. (2010). Public-Private Partnerships in Business and Government. *The Oxford Handbook of Business and Government*, (March 2019), 1–16.

Grimsey, D., & Lewis, M. (2004). *Public private partnerships : the worldwide revolution in infrastructure provision and project finance*. Northampton, MA: Edward Elgar.

Haggerty, K. D., & Ericson, R. V. (2000). The surveillant assemblage. *British Journal of Sociology*, *51*(4), 605–622.

Hall, R. B., & Biersteker, T. J. (Eds.). (2002). *The Emergence of Private Authority in Global Governance*. Cambridge: Cambridge University Press.

Hansen, H. K. (2011). Managing corruption risks. *Review of International Political Economy*, *18*(2), 251–275.

Hansen, H. K. (2012). The power of performance indices in the global politics of anti-corruption. *Journal of International Relations and Development*, *15*(4), 506–531.

Hansen, H. K., & Tang-Jensen, M. H. (2015). Making up corruption control: Conducting due diligence in a Danish law firm. *Ephemera-Theory and Politics in Organization*, *15*(2), 365–385.

Haufler, V. (2001). *A public role for the private sector : industry self-regulation in a global economy*. Carnegie Endowment for International Peace.

Haufler, V. (2003). New forms of governance: certification regimes as social regulations of the global market. In E. Meidinger, C. Elliott, & G. Oesten (Eds.), *Social and Political Dimensions of Forest Certification* (pp. 237–248). Germany: Forstbuch: Remagen-Oberwinter.

Heineman, B. W. (2009). The Role of the Multi-National Corporation in the Long War against Corruption. In R. I. Rotberg (Ed.), *Corruption, Global Security, and World Order*. Cambridge: Brookings Institution Press.

Héritier, A. (Ed.). (2002). *Common goods : reinventing European and international governance*. Lanham: Rowman & Littlefield Publishers.

Hindess, B. (2005). Investigating International Anti-corruption. *Third World Quarterly*, *26*(8), 1389–1398.

IACC. (2018). 18th International Anti-Corruption Conference: Fighting Facilitation Payments - Innovat... Retrieved October 11, 2019, from https://18iacc.sched.com/event/FzoZ/fighting-facilitation-payments-innovative-or-insane

International Organization for Standardization. (2016). ISO 37001 Anti-bribery management systems. Retrieved December 3, 2017, from https://www.iso.org/iso-37001-anti-bribery-management.html

ISO. (2016). *ISO 37001-Anti-bribery management systems*. Retrieved from https://www.iso.org/files/live/sites/isoorg/files/archive/pdf/en/iso_37001_anti_bribery_mss.pdf

Jakobi, A. P. (2013a). *Common Goods and Evils? The Formation of Global Crime Governance*. Oxford: Oxford University Press.

Jakobi, A. P. Global Crime Governance in World Society, Common Goods and Evils?The Formation of Global Crime Governance § (2013). Oxford Scholarship Online.

Jakobi, A. P. (2013c). The changing global norm of anti-corruption: from bad business to bad government. *Zeitschrift Fur Vergleichende Politikwissenschaft*, *7*, 243–264.

Jakobi, A. P. (2016). Non-state actors and global crime governance: Explaining the variance of Public-private interaction. *British Journal of Politics and International Relations*, *18*(1), 72–89.

Jongen, H. (2018). The authority of peer reviews among states in the global governance of corruption. *Review of International Political Economy*, *25*(6), 909–935.

Jordana, J., & Levi-Faur, D. (2004). *The politics of regulation : Institutions and regulatory reforms for the age of governance*. Cheltenham: Edward Elgar.

Klinkhammer, J. (2013). On the dark side of the code: Organizational challenges to an effective anti-corruption strategy. *Crime, Law and Social Change*, *60*(2), 191–208.

Langsted, P. D., & Langsted, L. B. (2015). The Civil Law Consequences of Corruption According to the Laws of the Least Corrupt Country in the World – Denmark. In M. J. Bonell & O. Meyer (Eds.), *The Impact of Corruption on International Commercial Contracts*. Springer.

Lord, N. (2013). Regulating transnational corporate bribery: Anti-bribery and corruption in the UK and Germany. *Crime, Law and Social Change*, *60*(2), 127–145.

Lounsbury, M. (2008). Institutional rationality and practice variation: New directions in the institutional analysis of practice. *Accounting, Organizations and Society*, *33*(4–5), 349–361.

Mark, G. (2012). Private FCPA Enforcement. *American Business Law Journal*, *49*(3), 419–506.

Mattern, J. B. (2011). A practice theory of emotion for International Relations. In E. Adler & V. Pouliot (Eds.), *International Practices*. Cambridge: Cambridge University Press.

McCoy, J. L., & Heckel, H. (2001). The Emergence of a Global Anti-corruption Norm. *International Politics*, *38*, 65–90.

Merton, R. K. (1936). The Unanticipated Consequences of Purposive Social Action. *American Sociological Review*, *1*(6), 894–904.

Moog, S., Spicer, A., & Böhm, S. (2015). The Politics of Multi-Stakeholder Initiatives: The Crisis of the Forest Stewardship Council. *Journal of Business Ethics*, *128*(3), 469–493.

Moran, J. (2003). Bribery and Corruption: the OECD Convention on Combating the Bribery of Foreign Public Officials in International Business Transactions. *Business Ethics: A European Review*, *8*(3), 141–150.

Nadelmann, E. A. (1990). Global Prohibition Regimes: The Evolution of Norms in International Society. *International Organization*, *44*(4), 479–526.

O'Rourke, D. (2006). Multi-stakeholder regulation: privatizing or socializing global labor standards? *World Development*, *34*(5), 899–918.

OECD. (1997). OECD Convention on Combating Bribery of Foreign Public Officials in International Business, 1–44. Retrieved from http://www.oecd.org/daf/anti-bribery/ConvCombatBribery_ENG.pdf

OECD. (2019a). Phase 1 country monitoring of the OECD Anti-Bribery Convention. Retrieved March 5, 2019, from https://www.oecd.org/daf/anti-bribery/anti-briberyconvention/phase1countrymonitoringoftheoecdanti-briberyconvention.htm

OECD. (2019b). Phase 2 country monitoring of the OECD Anti-Bribery Convention. Retrieved March 5, 2019, from https://www.oecd.org/daf/anti-bribery/anti-briberyconvention/phase2countrymonitoringoftheoecdanti-briberyconvention.htm

OECD. (2019c). Phase 3 country monitoring of the OECD Anti-Bribery Convention. Retrieved March 5, 2019, from https://www.oecd.org/daf/anti-bribery/anti-briberyconvention/phase3countrymonitoringoftheoecdanti-briberyconvention.htm

Orlikowski, W. J. (2000). Using Technology and Constituting Structures: A Practice Lens for Studying Technology in Organizations. *Organization Science*, *11*(4), 404.

Pacini, C., Swingen, J. A., & Rogers, H. (2002). The Role of the OECD and EU Conventions in Combating Bribery of Foreign Public Officials. *Journal of Business Ethics*, *37*(4), 385–405.

Pouliot, V., & Thérien, J. P. (2017). Global Governance in Practice. *Global Policy*, *9*(2), 163–172.

Preston, L. E., & Windsor, D. (1992). *The Rules of the Game in the Global Economy: Policy Regimes for International Business*. Springer-Science+Business Media, B.V.

Rabinow, P., & Sullivan, W. M. (Eds.). (1979). *Interpretive Social Science : A Reader* (1st ed.). Berkeley: University of California Press.

Rasche, A. (2012). Global Policies and Local Practice: Loose and Tight Couplings in Multi-Stakeholder Initiatives. *Business Ethics Quarterly*, *22*(4), 679–708.

Reckwitz, A. (2002). Toward a Theory of Social Practices A Development in Culturalist Theorizing. *European Journal of Social Theory*, *5*(2), 243–263.

Rees, J., Mullins, D., & Bovaird, T. (2012). *Third sector partnerships for public service delivery : an evidence review* (No. Working Paper 60). *Third Sector Research Centre. TSRC Informing Civil Society*.

Reinicke, W. H. (1998). *Global public policy : governing without government?* Brookings Institution Press.

Rodriguez, P., Siegel, D. S., Hillman, A., & Eden, L. (2006). Three Lenses on the Multinational Enterprise: Politics, Corruption, and Corporate Social. *Source Journal of International Business Studies*, *37*, 733–746.

Rogers, T. (2008). *Conferences and Conventions: A global industry* (2nd ed.). Amsterdam: Elsevier.

Rose, C. (2015). *International anti-corruption norms: their creation and influence on domestic legal systems*. Oxford: Oxford University Press.

Sampson, S. (2010). The anti-corruption industry: From movement to institution. *Global Crime*, *11*(2), 261–278.

Sampson, S. (2016). The "Right Way": Moral Capitalism and the Emergence of the Corporate Ethics and Compliance Officer. *Journal of Business Anthropology*, (Special Issue 3), 65–86.

Schatzki, T., Cetina, K. K., & Savigny, von E. (Eds.). (2001). *The Practice Turn in Contemporary Theory*. London: Routledge.

Schatzki, T. R. (2002). *The Site of the Social*. University park, Pensylvania: The Pensylvania State University press.

Scherer, A. G., & Palazzo, G. (2011). The New Political Role of Business in a Globalized World: A Review of a New Perspective on CSR and its Implications for the Firm, Governance, and Democracy. *Journal of Management Studies*, *48*(4), 899–931.

Scherer, A. G., Palazzo, G., & Baumann, D. (2006). Global Rules and Private Actors: Toward a New Role of the Transnational Corporation in Global Governance. *Business Ethics Quarterly*, *16*(4), 505–532.

Seabrook, L., & Hobson, J. M. (2009). Everyday international political economy. In M. Blyth (Ed.), *Routledge Handbook of International Political Economy (IPE)* (pp. 284–300). London and New York: Routledge.

Slager, R. (2017). The Discursive Construction of Corruption Risk. *Journal of Management Inquiry*, *26*(4), 366–382.

Slager, R., Gond, J.-P., & Moon, J. (2012). Standardization as Institutional Work: The Regulatory Power of a Responsible Investment Standard. *Organization Studies*, *33*(5–6), 763–790.

Strange, S. (1988). *States and markets*. London: Pinter Publishers.

Thérien, J.-P., & Pouliot, V. (2006). The Global Compact: Shifting the Politics of International Development? *Source: Global Governance*, *12*(1), 55–75.

Timmermans, S., & Epstein, S. (2010). A World of Standards but not a Standard World: Toward a Sociology of Standards and Standardization. *Annual Review of Sociology*, *36*, 69–89.

Transparency International. (2019). Anti-corruption glossary. Retrieved March 11, 2019, from https://www.transparency.org/glossary/term/facilitation_payments

Tsingou, E. (2018). New governors on the block: the rise of anti-money laundering professionals. *Crime, Law and Social Change*, *69*(2), 191–205.

Vincke, F., & Heimann, F. (Eds.). (2003). *Fighting Corruption - a Corporate Practices Manual*. Paris: ICC Publishing S.A. Retrieved from https://www.bookdepository.com/Fighting-Corruption-Corporate-Practices-Manual-Francois-Vincke/9789284213214

Walters, W. (2008). Anti-policy and anti-politics: Critical reflections on certain schemes to govern bad things. *European Journal of Cultural Studies*, *11*(3), 267–288.

Webb, P. (2005). The United Nations Convention Against Corruption: Global Achievement or Missed Opportunity? *Journal of International Economic Law*, *8*(1), 191–229.

Weber, J., & Getz, K. (2004). Buy Bribes or Bye-Bye Bribes: The Future Status of Bribery in International Commerce. *Business Ethics Quarterly-Business Ethics in a Global Economy*, *14*(4), 695–711.

Weismann, M. F. (2009). The Foreign Corrupt Practices Act: The Failure of the Self-Regulatory Model of Corporate Governance in the Global Business Environment. *Journal of Business Ethics*, *88*, 615–661.

Weismann, M. F., Buscaglia, C. A., & Peterson, J. (2014). The Foreign Corrupt Practices Act: Why It Fails to Deter Bribery as a Global Market Entry Strategy. *Journal of Business Ethics*, *123*, 591–619.

WGB-Monitoring Schedule. (2016). *Convention on Combating Bribery of Foreign Transactions Working Group on Bribery in International Business Transactions Monitoring Schedule December 2016 - June 2024*.

WGB-Phase 1. (2000). *OECD Working Group on Bribery-Denmark. Review of implementation of the Convention and 1997 Recommendation*. Retrieved from http://www.oecd.org/daf/anti-bribery/anti-briberyconvention/2018413.pdf

WGB-Phase 2. (2006). *OECD Working Group on Bribery-Denmark. Report on the application of the Convention on combating bribery of foreign officials in international business transactions and the 1997 recommendation of combating bribery in international business transactions*. Retrieved from http://www.oecd.org/daf/anti-bribery/anti-briberyconvention/36994434.pdf

WGB-Phase 2 follow up. (2008). *OECD Working Group on Bribery-Denmark. Follow-up report on the implementation of the phase 2 recommendations*. Retrieved from https://www.oecd.org/daf/anti-bribery/anti-briberyconvention/41073747.pdf

WGB-Phase 3. (2013). *OECD Working Group on Bribery-Denmark*. Retrieved from http://www.oecd.org/daf/anti-bribery/Denmarkphase3reportEN.pdf

WGB-Phase 3 follow up. (2015). *OECD Working Group on Bribery-Denmark*. Retrieved from http://www.oecd.org/daf/anti-bribery/Denmark-Phase-3-Written-Follow-Up-Report-EN.pdf

Wolfensohn, J. D. (1996). People and Development. Retrieved January 20, 2018, from http://web.worldbank.org/WBSITE/EXTERNAL/EXTABOUTUS/ORGANIZATION/EXTPRESIDENT/EXTPASTPRESIDENTS/PRESIDENTEXTERNAL/0,,contentMDK:20025269~menuPK:232083~pagePK:159837~piPK:159808~theSitePK:227585,00.html

Wood, G., & Wright, M. (2015). Corporations and New Statism: Trends and Research Priorities. *Academy of Management Perspectives*, *29*(2), 271–286.

Wrage, S., & Wrage, A. (2005). Multinational enterprises as "moral entrepreneurs" in a global prohibition regime against corruption. *International Studies Perspectives*, *6*(3), 316–324.

Yeoh, P. (2012). Bribery Act 2010: implications for regulated firms. *Journal of Financial Regulation and Compliance*, *20*(3), 264–277.

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