

ENHANCING ENVIRONMENTAL SUSTAINABILITY THROUGH CODES OF ETHICS: THE CASE OF ITALIAN LISTED COMPANIES

*Silvia Testarmata**, *Alessia Montecchia***, *Emiliano Di Carlo****

Abstract

Codes of ethics aims to disclose corporate social responsibility and to promote ethical culture throughout the firms. Several studies have investigated the content of such codes to identify what values are declared within. However, so far literature on codes of ethics seems not to have considered adequately the question of environmental protection. Therefore this paper focuses on the disclosure of environmental sustainability in codes of ethics, investigating the case of Italian listed companies. Adopting a content analysis methodology, the paper explores the environmental section of these codes in order to assess the salience of environmental sustainability in the strategic orientation of the firms, identifying the environmental principles, objectives, instruments and certification stated within the codes of ethics and highlighting whether and to what extent the environmental disclosure varies among industries. The research findings suggest that the Italian listed companies are more oriented to emphasize the environmental principles rather than to define precise objectives and instruments useful to achieve the environmental sustainability in practice. Nevertheless the more polluted industries seem to provide a wider environmental disclosure.

Keywords: Codes of Ethics, Environmental Sustainability, Italian Listed Companies

* Corresponding author, *Unicusano University, Via Don Carlo Gnocchi 3, 00166, Rome, Italy*

E-mail: silvia.testarmata@unicusano.it

** *University of Rome 'Tor Vergata', Via Columbia 2, 00133, Rome, Italy*

E-mail: alessia.montecchia@uniroma2.it

*** *University of Rome 'Tor Vergata', Via Columbia 2, 00133, Rome, Italy*

E-mail: dicarlo@uniroma2.it

1. Introduction

The environmental disasters caused by companies (e.g. Exxon, British Petroleum) have generated a great deal of attention on the impact of business practices on environment and, more in general, on sustainability. Concern about the environment has become an emerging topic for regulators, scholars and business, generating an exponential interest in Corporate Social Responsibility (CSR) activities and reporting.

Most important international bodies (i.e., OECD, European Commission) invited companies to move beyond legal requirements, integrating corporate social responsibility as a strategic investment into their core business strategy, management instruments and operations (European Commission, 2001).

Several studies pointed out how many corporations reacted to these changes, integrating environmental issues into their mission statements and starting to adopt various instruments, such as the code of ethics or environmental, social or sustainable reporting (KPMG, 2008; Perrini, 2006).

Among all CSR instruments the code of ethics occupies a central role (Erwin, 2011; Lugli et al.,

2009; Mittal et al., 2008), since it can be considered an ethical tool employed to establish and communicate CSR policies and to develop ethical organizational culture (Kaptein, 2004; Schwartz, 2001; Van Tulder et al., 2009). Through codes of ethics companies declare their ethical responsibility and behaviours towards various internal and external stakeholders (Farrel and Cobbin, 2000; Winkler, 2011). Therefore the study of codes of ethics is an established field within business ethics research (Svensson et al., 2009; Winkler, 2011).

Numerous scholars have investigated the codes using a content analysis methodology (Helin and Sandström, 2007). Specifically, literature analyses country-specific features or industries; other studies compare codes issued in different countries; several articles emphasize different kind of ethical issues. However, academic research on the environmental sustainability in codes of ethics seems to be limited. Only few studies investigate whether and to what extent the industry sector may influence the content and the quality of codes of ethics (Lugli et al., 2009).

Therefore, the purpose of the paper is to fill this gap investigating the environmental section of such codes, trying to identify the features of the

environmental sustainability's disclosure in codes of ethics and to identify the main differences among industries according to the general framework of legitimacy theory (Suchman, 1995). In other words, we aim to answer to the following research questions: what types of environmental issues are disclosed through codes of ethics? And, whether and to what extent the pieces of environmental information given to the stakeholders are affected by the industry sector in which the company operate.

To answer these questions, we present a content analysis investigating the codes of ethics of 230 companies, listed on the Italian Stock Exchange. The content analysis is focused on the environmental section of these codes. The empirical results highlight that companies are more oriented to emphasize the environmental principles rather than to define precise objectives and instruments useful to achieve the environmental sustainability in practice by converting the environmental values into rules of conduct. This is probably due to the fact that environmental protection is still considered by firms as an additional cost (Friedman, 1970) or as a regulation to comply with rather than as fundamental business strategy leading to a sustainable competitive advantage (Porter and Kramer, 2006).

In sum, this paper contributes to research on codes of ethics in the following ways: first, it explores the disclosure of the environmental sustainability in codes' content; second, it identifies the factors addressing the environmental orientation of the firm in codes of ethics; third, it highlights the differences in the environmental disclosure among industries.

Our results have several implications for scholars, practitioners and regulators. First, the study points out that there is a need to investigate more closely the environmental disclosure in codes of ethics, focusing on environmental instruments and standards. Second, the research findings suggest that the establishment of a code of ethics by itself is not enough; it should be supported by the adoption of strictly compliant rules of conduct and other ethical initiatives. Thus, a clear implication is that implementation and monitoring of codes of ethics are two critical steps for their effectiveness. Third, in order to develop the environmental sustainability in practice, the values stated in the codes of ethics have to be translated into organizations behaviour mainly through training and communication programs.

Therefore, the paper is organized as follows. In section two, the theoretical framework and the previous studies on codes of ethics are reviewed. In section three, the research design is presented. In this section our approach to use content analysis as suitable method to examine codes of ethics is discussed, then the data collection and data analysis

are depicted. Next, the environmental sustainability's factors disclosed in codes of ethics are presented. In section four, the research results are presented and, consequently, in section five they are discussed. Finally, in section six the conclusions of the analysis and the research implications are presented.

2. Theoretical framework and literature review on code of ethics

Although several theories have been used to explain the motivations for both CSR and voluntary disclosure, a clear and recognized theoretical framework has not yet been developed. However, as pointed out by Deegan (2002), stakeholder, legitimacy and institutional theories should not be considered as separated frameworks since the fact they have been developed from a similar philosophical background and they all share some common characteristics. In fact, as also noted by Chen and Roberts (2010: p. 661), even if these theories have different level of perspective and specificity, they all are aimed to explain how organizations survive and, mostly important, they all emphasize that maximization of profit is not the only responsibility of business organizations.

Therefore, "the choice of broad theoretical framework depends on whether the researcher approaches the question of CSR from an economic or an ethical standpoint" (Holder-Webb et al., 2009: p. 499). In this debate, Chen and Roberts note "legitimacy theory is more appropriate when the research primarily focuses on how corporations manage their public image. [...] Institutional theory is considered the proper choice for studies that investigate a specific corporation structure, system, program [...] resource dependence theory and stakeholder theory are suitable for research interested in the relationship and interaction between two or more organizations and groups" (2010: p. 661-662).

Stemming from these considerations, we embrace a legitimacy perspective as a main explanatory theory to investigate what is the disclosure of the environmental sustainability in codes of ethics and whether and to what extent the environmental content of such codes varies across industries. Legitimacy theory (Lindblom, 1994; Suchman, 1995) focuses on whether the principles of an organization are aligned with the value system of the society in which it operates, and whether an objective of organizations is to meet social expectations. Legitimacy theory, however, does not specify how the congruency between the organizational and societal values could be reached or what actions should be taken to pursue it (Chen and Roberts, 2010).

As noted by Dowling and Pfeffer (1975: p. 122), "organizations seek to establish congruence

between the social values associated with or implied by their activities and the norms of acceptable behaviour in the larger social system of which they are part. Insofar, as these two value systems are congruent we can speak of organizational legitimacy. When an actual or potential disparity exists between the two value systems, there will exist a threat to organizational legitimacy”.

Based on a systems-oriented point of view, legitimacy theory believes that each company is influenced by the society in which it operates but, in the same time, it uses corporate disclosure as a means to influence societal perceptions about its activities (Deegan, 2002; Pfeffer and Salancik, 1978; Woodward et al., 2001). Providing social and environmental information, organizations expect that society approve their actions and objectives and consequentially their survival (Dowling and Pfeffer, 1975; Parker, 2011).

Organizational legitimacy is a resource for survival but it can be also manipulated (Woodward et al., 2001). In this perspective, corporate social responsibility disclosure is a strategy tool that a company can use to respond to the various expectations of its stakeholders (McKinney et al., 2010; Perrini et al., 2007). Organizations seek to get a legitimacy status through different instruments commonly used to manage and communicate CSR practices. These instruments generally range from voluntary tools, as codes of ethics, to complex environmental management systems and communication tools (Clarkson et al. 2008; Gray, 2010).

As argued by notable authors (Kaptein and Schwartz, 2008; Lugli et al., 2009) code of ethics represents one of the main instruments for implementing CSR inside organizations and to communicate to follow an ethical behaviour towards the external environment. The application of the ethical values to the behaviour of the operators inside the firm increases the firm's reputation and improves its image, in order to generate trust on the outside. In this sense, code of ethics is not only an internal instrument, but also a point of reference for relations between the firm and the outside world (Lugli et al., 2009).

Langlois and Schlegelmilch (1990) define it as “a statement setting down corporate principles, ethics, rules of conduct, codes of practice or company philosophy concerning responsibility to employees, shareholders, consumers, the environment, or any other aspects of society external to the company” (1990: p. 522).

Since the diffusion of codes of ethics, the academic community has extensively studied them. Scholars generally address the content, output and implementation of codes of ethics (Helin and Sandström, 2007; Stevens, 1994).

Regarding content, research concentrates on country or non-country specific features (Lugli et al., 2009; O'Dwyer et al. 2006; Singh, 2006; Singh et al., 2005; Snell et al., 1999); specific industries (Dumas and Blodgett, 1999; Flanagan and Clarke, 2007; Gaumnitz and Lere, 2002; Kinchin, 2007; Preston et al., 1995; Sirgy et al., 2005); specific types of organizations (Asgary and Mitschow, 2002; Farrell and Cobbin, 2000; Preuss, 2009), and different kind of ethical issues (Gordon and Miyake, 2001; Kapstein, 2004; Singh, 2011; Valentine and Barnett, 2002). With respect to output, there is a lively discussion about the effectiveness and quality of codes of ethics highlighting what effects on behaviour they have (Adams et al., 2001; Erwin, 2011; Helin et al., 2011; Jensen et al., 2009; Kaptein and Schwartz, 2008; Lere and Gaumnitz, 2003; McKinney et al., 2010; Singh, 2011; Stevens, 2008; Winkler, 2011). In terms of implementation, studies ask why and to what extent companies and other organizations adopt codes of ethics (Adam and Rachman-Moore, 2004; Haxhi and van Ees, 2010; Valentine and Johnson, 2005) and communicate such documents (Bernardi and LaCross, 2009; LaCross and Bernardi, 2006).

Several studies have investigated the business codes of ethics from around the world to determine which ethical and social values are prevalent. For example, Dumas and Blodgett (1999) analysed 50 family business mission statements and identified the following as the most prominent core values: quality (42%); commitment (25%); social responsibility (20%) and fairness (18%). Kapstein (2004) investigated the codes of two hundred of the largest corporations in the world. He found the following prevalence of ‘stakeholder principles’ (i.e., values): transparency (55%), honesty/truth (50%) and fairness/impartiality (45%), with no reference to social responsibility.

Lugli et al. (2009) examined the codes of ethics of companies operating in the private sector in Italy in order to identify any correlation among the characteristics and the contents of these documents. From the data analysis, they found that the environmental protection is one of the most declared social value (62%) but examining the “conversion” of environmental questions into rules of conduct, only 52% of the codes contained concrete actions which the firm announced its intention to take in order to fulfil its duties towards the human society and the environment.

Erwin (2011) observed a significant relationship between the quality of codes and ethical performance. The author found that companies maintaining high quality were they are significantly presented among CSR ranking systems for corporate citizenship, sustainability, ethical behaviour and public perception.

Despite the mixed findings of research studies on the effectiveness of corporate codes of ethics in influencing behaviour (Kaptein and Schwartz, 2008; Lugli et al., 2009), these codes are potentially valuable in corporate decision-making and they may be considered as a signal to stakeholders about the organizational values of the company (Clark and Leonard, 1998; McKinney et al. 2010; Schwartz, 2001; Singh et al., 2005).

However there is a lack of studies focused on the environmental disclosure in codes of ethics. Thus, the understanding of the determinants and effects of corporate environmental strategies is still not sufficiently investigated. Moreover, just few studies analyse the influence of the company's industry sector on the content and quality in codes of ethics (Lugli et al. 2009; Perrini et al., 2007). Thus, we attempt to fill this gap through a content analysis of the environmental disclosure in the codes of ethics of Italian listed companies in order to understand what are the environmental sustainability's factors disclosed in those codes and whether and how the industry sector affect the environmental disclosure. In other words, we aim to define to what extent companies are environment-oriented and if and how they disclose the value of environmental sustainability in their mission statements as well as their environmental policies (principles and objectives), instruments and certifications in codes of ethics.

According to legitimacy theory, we expect that the more the industry is pollutant the more the companies belonging to that industry care about environmental sustainability and extensively disclose this issue in the code of ethics (see, for example, Du and Vieira, 2012). This is due to the fact that companies aim to protect their public image and reputation and, as a result, that the more polluting industries (Clarkson et al., 2008), such as Oil and Gas, Utilities and Basic Materials are more sensitive to environmental sustainability.

3. Research design

The aim of the analysis is to identify how codes of ethics declare and communicate specific understanding of company's environmental sustainability. In other words, codes of ethics are

the object analysed and the content analysis is the tool used to achieve this goal.

We adopt a content analysis to quantify and classify codes' information because this method provides researchers with a systematic approach to analyse large datasets (Krippendorff, 1980). Moreover, content analysis is a widely used method by which selected items of qualitative data are systematically converted to numerical data (Collis and Hussey, 2009) and it is extensively used in the analysis of code of ethics (Helin and Sandström, 2007; Gaumnitz and Lere 2004). Normally, the method provides to examine a document (in this study the code of ethics) and determine the coding units, such as a particular word, character, item or theme, which is found in the code of ethics. The next step is to construct a coding frame, which lists the coding units in the first column, leaving room for the analysis of each communication to be added on the horizontal axis. So, the analysis can be based on the frequency of occurrence and its percentage on the overall observations.

3.1. Data collection and sample

The sample includes all codes of ethics adopted by the Italian companies listed on the MTA (Mercato Telematico Azionario) of the Italian Stock Exchange. We selected these companies because they are the most visible Italian firms and, therefore, the most important as perceived by investors, business analysts and the public. At the end of the collection period (March 2011), 259 companies were listed.

Data collection started with visiting the web pages of the companies and searching for formal documents addressing business ethics issues (usually titled 'Code of ethics' or 'Code of conduct'). In most cases, the document has been found within the sections "Corporate Governance" or "Investor Relations" of the company's web sites. We collected 230 codes of ethics.

Concerning the sample composition, Table 1 shows the categories classifying companies by Stock Exchange segments whereas Table 2 illustrates the companies forming the sample categorized by industry sector.

Table 1. Sample composition by Stock Exchange segment

| MTA SEGMENTS | Number of firms | Number of firms adopting a code of ethics | Percentages of firms adopting a code of ethics |
|----------------|-----------------|---|--|
| FTSE MIB | 40 | 40 | 100% |
| FTSE MID CAP | 60 | 58 | 97% |
| FTSE SMALL CAP | 140 | 116 | 83% |
| FTSE MICRO CAP | 19 | 16 | 84% |
| TOTALS | 259 | 230 | 89% |

Source: our elaboration

Table 2. Sample composition by industry sector

| SECTOR | Number of firms | Number of firms adopting a code of ethics | Percentage of firms adopting a code of ethics |
|--------------------|-----------------|---|---|
| Oil and Gas | 5 | 5 | 100% |
| Basic Materials | 7 | 6 | 86% |
| Industrials | 63 | 55 | 87% |
| Consumer Goods | 47 | 44 | 94% |
| Health Care | 7 | 7 | 100% |
| Consumer Services | 30 | 25 | 83% |
| Telecommunications | 4 | 4 | 100% |
| Utilities | 19 | 17 | 89% |
| Financials | 57 | 49 | 86% |
| Technology | 20 | 18 | 90% |
| TOTALS | 259 | 230 | 89% |

Source: our elaboration

3.2. Data analysis

We empirically explore the content of corporate codes of ethics in the leading Italian listed companies looking at the disclosure of environmental sustainability.

First, data analysis began with the identification of the general structure of the documents. Generally, a code of ethics is structured on several parts, such as general principles; ethical norms regulating firm's relations with stakeholders; ethical behavioural standards; internal sanctions; implementation. In the next step, the analysis focuses on the actors addressed in the codes and additionally it concentrates on the tools of communication and dissemination of such documents. The following step of the study regards the analysis of the environmental sustainability's disclosure. Adopting an inductive approach it sought to identify the main issues addressed in the environmental section of the codes and, as a consequence, the similarities and differences existing among the codes of companies belonging to different industries.

The analysis of codes of ethics is manually done by one author and checked for accuracy by the second and third authors. Then, the dataset is analysed by descriptive statistics (frequencies and percentages) and the research results are discussed in the research findings section. Note that the percentages showed in the tables are obtained dividing the number of observations by the total number of firms adopting a code of ethics for each sector.

3.3. Environmental sustainability's factors disclosed in codes of ethics

Starting from codes of ethics observations we identify six broad categories in order to analyse the contents of the codes of ethics. The detected environmental sustainability's factors are as follows: (1) code of ethics dissemination; (2) salience of environmental sustainability; (3)

mission and environmental orientation; (4) environmental principles and objectives; (5) environmental instruments; (6) reference to specific certifications and environmental declarations.

We measure the disclosure of environmental sustainability's factors using binary indicators, specifying whether information was given about a factor of environmental sustainability or not. In the next paragraphs the environmental sustainability's factors disclosed in codes of ethics are explained.

1) Code of ethics dissemination

The first area of investigation identifies the scope of codes of ethics and the instruments used to disclose the firm's values and rules of conduct inside and outside the company.

2) Salience of environmental issue

This area analyses the salience of environmental sustainability in codes of ethics exploring the number of pages of codes and the presence of an environmental section (Gaumnitz and Lere, 2004). When the latter variable is present, we consider the number of pages and lines dedicated to it.

3) Mission and environmental orientation

The third area of investigation focuses on the mission declared by the companies with the aim to verify how the concepts of sustainability and the environment are specified therein.

Every organization defines its identity, purposes, and values and why it should exist through a mission statement. By defining the core values, purposes and goals, the mission statement clarifies the essence of an organization (Blodgett et al., 2011). It reflects the organization's values and clearly enumerates the reasons why the organization exists (Collins and Porras, 1995). It is a codification of the essential corporate behaviour (Trevino and Nelson, 2010).

Stemming from these considerations, we expect that the mission statements of Italian listed companies reflect their core values and environmental orientation. Hence each mission statement was content analysed for expressed environmental values. Specifically, we employ

content analysis to verify the frequency of the words “environment” and “sustainability”.

4) Environmental principles and objectives

The fourth area investigated is the “environmental principles and objectives”. By this expression we refer to the environmental principles, which guide the firm in its activities. Consequently, we identify three categories most widely found in codes’ contents: (1) the company claims to guide its actions to sustainability; (2) the code indicates the guiding principles of environmental policies; (3) the code indicates the objectives of environmental policies.

In order to identify if *the company claims to guide its actions to sustainability*, we verify if the company declares to orient its business towards sustainable development and, in particular, if it claims to take decisions and actions towards environmental sustainability. We consider that *the code indicates the guiding principles of environmental policies* if it refers to any principles, declared by the company, underpinning the environmental sustainability. Finally, we consider that *the code indicates the objectives of environmental policies*, if the firm declares the environmental objectives to pursue. These objectives represent an element of the environmental policy and, in the same time, the output of the environmental management system (Kirkland and Thompson, 1999).

5) Environmental instruments

This area analyses the instruments adopted by the companies to achieve the declared environmental sustainability objectives. The codes’ observation allow us to divide these instruments into four broad categories: *the adoption of an environmental management system; planning and control instruments* (e.g., life cycle assessment; environmental auditing; environmental performance indicators); *instruments of environmental reporting and communication to the market* (e.g., integrated report; sustainability report; social report; environment report; environment statement; network development); *other voluntary*

instruments (e.g., voluntary agreements; training programs; customers and stakeholders programs for national resources optimization; green procurement tools).

6) Reference to specific certifications and environmental declarations

The last area of investigation is the adoption of specific certifications and environmental declarations clearly included in the codes of ethics. The most widely mentioned certifications are: *environmental certification systems* (e.g., Eco-Management and Audit Scheme, ISO 14001, Environmental, health and safety), *environmental product certifications* (e.g., Eco-label) and *other voluntary adherence to other environmental initiatives* (e.g., Unep, Equator Principles, Global Compact).

4. Research Findings

From the analysis we found that codes of ethics are similar for shape and structure but different for quantity and transparency of the information available on environmental sustainability. The research findings of the content analysis on the environmental sustainability’s factors in codes of ethics are presented as follows.

1) Code of ethics dissemination

With respect to the code dissemination our data – in line with other studies (Lugli et al., 2009) – confirm that codes of ethics are considered not only internal instruments, but also tools to disclose company values and rules of ethics to the general environment (see Table 3).

The codes composing the sample are normally addressed to directors, employees and collaborators. In particular, data reveal that greater attention is given to the employees (93%), collaborators (86%) and directors (85%) by a large part of the industry sectors. In addition, 58% is extended to the subsidiaries of the issuer. However, it seems interesting to underline the high percentage (70%) of codes that extend the application to external parties (e.g. suppliers, agents).

Table 3. Scope of code of ethics

| SECTOR | Shareholders | Directors | Employees | Collaborators | Subsidiaries | External Parties | Generic |
|--------------------|--------------|------------|------------|---------------|--------------|------------------|------------|
| Oil and Gas | 0% | 80% | 100% | 60% | 40% | 20% | 40% |
| Basic Materials | 0% | 67% | 83% | 83% | 50% | 83% | 0% |
| Industrials | 11% | 87% | 96% | 89% | 60% | 80% | 4% |
| Consumer Goods | 2% | 84% | 93% | 89% | 61% | 75% | 9% |
| Health Care | 14% | 71% | 100% | 57% | 57% | 71% | 14% |
| Consumer Services | 8% | 92% | 92% | 84% | 48% | 64% | 12% |
| Telecommunications | 25% | 75% | 100% | 75% | 50% | 25% | 0% |
| Utilities | 0% | 82% | 100% | 94% | 71% | 82% | 6% |
| Financials | 16% | 88% | 86% | 88% | 55% | 65% | 14% |
| Technology | 6% | 83% | 89% | 83% | 61% | 56% | 11% |
| TOTAL | 9% | 85% | 93% | 86% | 58% | 70% | 10% |

Source: our elaboration

As showed by Table 4, the most used disclosure instrument is the publication of the code of ethics on the company's website (37%). The 33% communicate the code by hand delivery,

especially in case of the new intake. Only 36% of the codes contemplate the training courses among the means of code of ethics dissemination.

Table 4. Tools for disclosing the code of ethics

| SECTOR | Delivery by hand | Online disclosure | Intranet | Posted on notice board | Declaration of awareness | On demand to the proper office | Training courses |
|--------------------|------------------|-------------------|------------|------------------------|--------------------------|--------------------------------|------------------|
| Oil and Gas | 40% | 40% | 40% | 0% | 0% | 40% | 60% |
| Basic Materials | 17% | 0% | 17% | 17% | 33% | 0% | 0% |
| Industrials | 27% | 36% | 18% | 15% | 15% | 18% | 36% |
| Consumer Goods | 34% | 41% | 18% | 11% | 11% | 16% | 36% |
| Health Care | 57% | 57% | 0% | 14% | 0% | 0% | 43% |
| Consumer Services | 20% | 28% | 16% | 12% | 4% | 20% | 32% |
| Telecommunications | 0% | 25% | 25% | 0% | 25% | 0% | 50% |
| Utilities | 59% | 35% | 35% | 6% | 12% | 18% | 47% |
| Financials | 39% | 39% | 24% | 4% | 27% | 12% | 29% |
| Technology | 28% | 39% | 17% | 11% | 22% | 22% | 50% |
| TOTAL | 33% | 37% | 20% | 10% | 16% | 16% | 36% |

Source: our elaboration

The cross-sector industry analysis highlights that the companies belonging to the Oil and Gas sector and to the Utilities sector pay more attention to the actual dissemination of the codes of ethics through the organization. In fact, most of these companies deliver the code by hand (respectively 40% and 59%) and organize training courses to convert the ethical values into organizational behaviour (respectively 60% and 47%).

2) Saliency of environmental sustainability

Considering a number of 230 codes of ethics with a number of 19 pages on average, we found that 57% of codes have a paragraph, or a particular section, that illustrates the question of environmental sustainability. Based on the number

of lines and pages dedicated to the environmental section, we found that, on average, the value of environmental sustainability is not stated but only mentioned in about half of the codes. In addition, where the environmental section is present it does not invest more than one page. In many cases, the company provides a separate section for the environmental issues without specifying policies and strategies to achieve the sustainable development of its activities. Many firms have sections or sub-sections in which declare, in a generic way, to protect the environment and to respect the environmental legislation, as showed by Table 5.

Table 5. Saliency of environmental sustainability

| SECTOR | Number of firms adopting a code of ethics | Number of pages of the code of ethics (on average) | Presence of environmental section/sub-section/article | Percentage of presence of environmental section/sub-section/article | Number of pages dedicated to environmental section | Number of lines dedicated to environmental section (on average) |
|--------------------|---|--|---|---|--|---|
| Oil and Gas | 5 | 33 | 5 | 100% | 1 | 30 |
| Basic Materials | 6 | 16 | 5 | 83% | 1 | 19 |
| Industrials | 55 | 21 | 38 | 69% | 1 | 16 |
| Consumer Goods | 44 | 9 | 25 | 57% | 1 | 13 |
| Health Care | 7 | 16 | 4 | 57% | 1 | 6 |
| Consumer Services | 25 | 16 | 15 | 60% | 1 | 6 |
| Telecommunications | 4 | 17 | 0 | 0% | 0 | 0 |
| Utilities | 17 | 30 | 17 | 100% | 1 | 23 |
| Financials | 49 | 17 | 16 | 33% | 1 | 13 |
| Technology | 18 | 17 | 7 | 39% | 1 | 6 |
| TOTAL | 230 | 19 | 132 | 57% | 1 | 13 |

Source: our elaboration

As we expected, the empirical results of the cross-sector industry analysis highlights that the more polluted industries, such as Oil and Gas, Basic Materials and Utilities, on average present a higher percentage of presence of environmental section (respectively 100%, 83% and 100%) and dedicates a wider space to the environmental sustainability's disclosure in codes of ethics (respectively 30, 19 and 23 lines).

3) Mission and environmental orientation

The findings of the mission statements analysis are shown in Table 6. From the analysis, a

limited orientation to the principles of sustainability and environment protection emerges. Only 139 mission statements (60%) have been detected, thus analysed. As a result, only 9% makes specific reference to "environmental sustainability" and 12% contains the word "environment" or equivalent. It seems that most companies do not perceived the environmental sustainability as a strategic aim and the environment protection as a part of their business strategies.

Table 6. Mission and environmental orientation

| SECTOR | Missions Available | Sustainability | Environment |
|--------------------|--------------------|----------------|-------------|
| Oil and Gas | 80% | 0% | 0% |
| Basic Materials | 33% | 0% | 50% |
| Industrials | 65% | 8% | 8% |
| Consumer Goods | 57% | 8% | 12% |
| Health Care | 57% | 0% | 0% |
| Consumer Services | 52% | 8% | 8% |
| Telecommunications | 75% | 0% | 0% |
| Utilities | 71% | 25% | 42% |
| Financials | 51% | 8% | 0% |
| Technology | 83% | 7% | 20% |
| TOTAL | 60% | 9% | 12% |

Source: our elaboration

However, the cross-sector industry analysis partially confirms our expectation, in fact, on average, the companies belonging to the Basic Materials sector and to the Utilities sector quotes the word "environment" more often (respectively 50% and 42%) than the others in the mission statements. The high percentage observed in the Basic Materials sector is probably due to the huge use of natural resources in this industry. On the contrary, the mission statement of the Oil and Gas companies point out the value creation for all the stakeholders. Nevertheless the environment could

be seen as a stakeholder to protect and safeguard (Banerjee and Bonnefous, 2011; Gibson, 2012; Schwartz, 2011) according to the triple bottom line approach to corporate social responsibility (Carroll, 1979).

4) Environmental principles and objectives

The analysis of the environmental principles and objectives statements has shown a reluctance to declare policies and strategies towards environmental sustainability. Table 7 presents the percentages of environmental policies expressly declared.

Table 7. Environmental principles and objectives

| SECTOR | The company claims to guide its actions to sustainability | The code indicates the guiding principles of environmental policies | The code indicates the objectives of environmental policies |
|--------------------|---|---|---|
| Oil and Gas | 100% | 100% | 100% |
| Basic Materials | 0% | 83% | 67% |
| Industrials | 29% | 73% | 67% |
| Consumer Goods | 32% | 57% | 45% |
| Health Care | 43% | 57% | 29% |
| Consumer Services | 0% | 68% | 48% |
| Telecommunications | 0% | 25% | 0% |
| Utilities | 71% | 100% | 100% |
| Financials | 14% | 35% | 29% |
| Technology | 28% | 44% | 33% |
| TOTAL | 27% | 60% | 51% |

Source: our elaboration

Only 27% on average claims to guide its action to environmental sustainability and protection. As we expected, according to legitimacy theory, the percentage is higher in the Oil and Gas sector (100%) and Utilities sector (71%). Obviously, we can explain this difference looking at the diverse nature of what is produced in these industries. In other words, it seems that the greater attention given by these industries to the environmental policies is justified by the major impact that companies' activities and processes have on the environment (Du and Vieira, 2012; Shrivastava, 1995), especially in terms of pollution (Freedman and Jaggi, 2005). The salience of environmental sustainability is even confirmed in the definition of the guiding principles and objectives, where the percentage is 100% of the companies belonging to these sectors.

It is important to highlight that, in very rare cases, the guiding principles of environmental

policy are specified in a particular section, whereas they are quite often generically mentioned in the disclosure of the business activity orientation. However, 60% of companies on average indicate the guiding principles of environmental policy within the code of ethics. In most cases, specific reference is made to law compliance and preservation of natural resources.

5) Environmental instruments

The disclosure regarding the instruments adopted by the companies to implement environmental policies and strategies show that only 20% of companies state to adopt an environmental management system (see Table 8). However, the cross-sector industry analysis highlights that this percentage is higher in the Oil and Gas (80%), Utilities (65%) and Basic Materials (33%) sectors.

Table 8. Environmental instruments

| SECTOR | The company adopts an environmental management system | Planning and control instruments | Instruments of environmental reporting and communication to the market | Other voluntary instruments |
|--------------------|---|----------------------------------|--|-----------------------------|
| Oil and Gas | 80% | 80% | 20% | 100% |
| Basic Materials | 33% | 67% | 33% | 50% |
| Industrials | 18% | 22% | 11% | 35% |
| Consumer Goods | 20% | 25% | 2% | 23% |
| Health Care | 29% | 0% | 14% | 14% |
| Consumer Services | 4% | 8% | 4% | 28% |
| Telecommunications | 0% | 0% | 0% | 0% |
| Utilities | 65% | 65% | 47% | 53% |
| Financials | 2% | 4% | 2% | 10% |
| Technology | 28% | 22% | 11% | 11% |
| TOTAL | 20% | 22% | 10% | 27% |

Source: our elaboration

A greater percentage (22%) states to use specific planning and control instruments to monitor environmental performance, however the declarations of the applied instruments are rare. As we expected, the percentage is higher in the Oil and Gas (80%), Basic Materials (67%) and Utilities (65%) sectors.

In addition, the instruments adopted for the environmental reporting and disclosure to the market are mentioned only in the 10% of the observations. However, the percentage is higher in the Utilities (47%), Basic Materials (33%), and Oil and Gas (20%) sectors.

Finally, the other voluntary instruments are declared in the 27% of the analysed companies. But, the industry analysis highlights that this percentage is higher in the Oil and Gas (100%), Utilities (53%) and Basic Materials (50%) sectors.

As a result, we can confirm our expectation about a greater attention to the ethical value of

environmental sustainability by the more polluted industries.

6) Reference to specific certifications and environmental declarations

The results on environmental certifications and declarations reveal a limited disclosure of environmental certifications; only 28% of the sample declares the adoption of an environmental certification system. The most cited are the ISO 14001 and the Eco-Management and Audit Scheme. However, the cross-sector industry analysis highlights that this percentage is higher in the Oil and Gas (100%), Utilities (53%) and Basic Materials (50%) sectors.

ISO 14001 in one of the most common certification adopted by thousands of companies worldwide and consists of monitoring internal environmental processes of the organization. KPMG (2008) reports that 51% of the Global Fortune 250 (G250) and 41% of the 100 largest companies by revenue (N100) are actually using

ISO 14001. However, it addresses only environmental issues and so it is not a comprehensive sustainability framework. It is also process-focussed, not outcome-focussed, so the environmental outcomes could still be unacceptable, even if the process was itself certified (Hubbard, 2011).

The Eco-Management and Audit Scheme (EMAS) has also been widely adopted within Europe (Castro and Chousa 2006). However, like ISO 14001, it is limited to environmental and process issues. In addition, it has no impact outside Europe. KPMG (2008) reports that only 8% of the Global 250 and 5% of the N100 organisations use it.

In addition, we observe that the environmental product certifications receive less attention than process certifications. Only 1% of companies state the adoption of a product certification. The prevalence of system certificates on product certifications may be due to several factors, such as the type of company, the business strategy and the limited understanding whether product certifications can really stimulate purchases or not.

Finally, the mention of voluntary environmental initiatives is very rare (2%) as shown by Table 9. As we expected, this percentage is higher in the Oil and Gas (20%), Basic Materials (17%) and Utilities (6%) sectors.

Table 9. Reference to environmental certification and declarations

| SECTOR | Company declares environmental certification systems | Company declares environmental product certifications | Voluntary adherence to other environmental initiatives |
|--------------------|--|---|--|
| Oil and Gas | 100% | 0% | 20% |
| Basic Materials | 50% | 0% | 17% |
| Industrials | 36% | 2% | 0% |
| Consumer Goods | 25% | 5% | 0% |
| Health Care | 14% | 0% | 0% |
| Consumer Services | 28% | 0% | 0% |
| Telecommunications | 0% | 0% | 0% |
| Utilities | 53% | 0% | 6% |
| Financials | 10% | 0% | 2% |
| Technology | 17% | 0% | 0% |
| TOTAL | 28% | 1% | 2% |

Source: our elaboration

5. Discussion

Financial crisis has generated a growing demand for transparency in corporate governance disclosure, especially with respect to business ethics. However, despite the increasing attention to the corporate social responsibility, the research findings suggest that business companies seem to underestimate the role of environmental sustainability in code of ethics. However, by developing this exploratory study on the codes of ethics of 230 Italian listed companies in different industries we obtain four main insights regarding the environmental disclosure in codes of ethics.

First, the fact that firms seem not to integrate the concept of environmental sustainability within their mission statements suggests that they have different aims for the environmental declaration in the codes of ethics, varying from true assessments of environmental sustainability's orientation to marketing communications of 'doing good', such as window-dressing policies or green washing practises. This is probably due to the lack of mandatory requirements, standards and formats for the environmental disclosure in code of ethics.

Second, despite the large amount of information presented, companies are more oriented

to emphasize the environmental principles rather than to define precise objectives and instruments to implement and manage environmental sustainability strategies. A number of companies emphasize very broad commitments to environmental protection, but neglect to provide details on how these commitments will be met. Moreover, in most cases, disclosing companies are at the very early stage in the adoption of environmental sustainability's approach. According to Lugli et al. (2009), the function of the environmental disclosure seems to be more communicating firm's position on environmental issues towards external partners than implementing ethical rules of conducts inside the organizations.

Third, the empirical results show that within codes of ethics there is little evidence of an extensive attention to environmental issues in terms of either quantity and/or quality. Nevertheless, the most "polluting" industries, such as Basic Materials, Oil and Gas and Utilities, are more active in declaring to act in a sustainable manner (see for example Du and Vieira, 2012). Conversely, a sustainable development should be not correlated with the kind of activities done but integrated and motivated as strategic aim (see, for examples,

Flammer, 2013; Gibson, 2012; Porter and Kramer, 2006).

In other words, the environmental values stated in the codes of ethics seem to be affected by industry characteristics. According to Lugli et al. (2009), we suggest that companies choose to declare their orientation to the environmental sustainability, and more in general, to the corporate social responsibility, to obtain the consensus from the part of the society that is most sensitive to those issues and to improve their public legitimacy (Chen and Roberts, 2010; Clarkson et al., 2008).

It probably depends on the fact that most companies still view the environmental protection as barrier to profitability or as a regulation to comply with rather than fundamental business strategy leading to a sustainable competitive advantage. In other words, this lack of attention to environmental sustainability could be addressed to the huge investments that companies necessarily would be obliged to perform in order to renew their production processes for adopting a sustainable approach to growth (see Sprinkle and Maines, 2010 for a review of the costs and benefits of corporate social responsibility).

Forth, an environmental sustainability's approach involves difficult choices because not all actions that reap benefits to society and environment also benefit shareholders, at least in the short term. Additionally, the investments to become sustainable are significant and often reflect their value in the long term (Flammer, 2013). Quite often scholars distinguish between companies that look to the environmental sustainability as a key factor to achieve a competitive advantage and those that are compliant with the minimum environmental requirements. The empirical results suggest that most of the Italian listed companies belong to the second category.

Thus, the research findings suggest that regulators could encourage firms to believe in the sustainable economic development in order to change their approach to the environmental sustainability from a mere principle declaration and/or a minimal compliance with the regulation to a truly environmental awareness and to become an "ecologically sustainable corporation" (Shrivastava, 1995).

6. Conclusion and research implications

Our research findings make several contributions to the literature. To best of our knowledge, this study is the first to theorize and provide empirical evidence on the features of environmental sustainability's disclosure in codes of ethics.

As a result, the empirical analysis identifies the factors of environmental sustainability disclosed in codes' content. However, the research findings point out that the environmental disclosure in the

codes of ethics of the Italian listed companies seems to be limited, primarily for what concerns the environmental instruments and the ethical rules of conduct. This might be affected by the fact that the study is based on data collected in March 2011, just some months before that the Italian Government, according to the European guidelines, introduced into Italian law, the administrative responsibility of legal persons, companies and associations without legal personality, pursuant to Legislative Decree no. 231/2001, for the commission of environmental offenses. So, for research purposes it seems interesting to study the evolution of codes of ethics to assess whether they have implemented the recent legislative changes on the administrative responsibility.

Additionally, the research findings highlights that there is a discrepancy in terms of environmental disclosure among Italian listed companies and suggest a standardization of this disclosure. Furthermore, the study is potentially significant for companies (e.g., SMEs) that have no experience in terms of environmental disclosure; in fact the empirical analysis highlights the more environmental oriented companies that could be examples to learn from to implement an environmental sustainable approach to the business activities.

Another interesting avenue for research is the study of the relationship between the adoption of administrative responsibility, and more generally of corporate social responsibility, and the reduction of the company's risk profile because, as argued by Orlitzky and Benjamin (2001), the adoption of an ethical and social responsible conduct could reduce the firm risk in practice.

In conclusion, our research findings have several implications for scholars, practitioners and regulators for what concerns the disclosure of environmental sustainability throughout codes of ethics.

First, the study points out that there is a need to investigate more closely the environmental disclosure in codes of ethics, focusing on environmental instruments and standards. Hence further research on disclosure of planning and control systems, environmental reporting and standards adopted by companies is needed.

Second, the research findings suggest that the establishment of a code of ethics is not enough; it should be supported by the adoption of strictly compliant rules of conduct and other ethical initiatives. Thus, a clear implication for practitioners is that not only codes development and contents but also codes implementation and monitoring are critical for their effectiveness (Erwin, 2001; Singh et al., 2005).

As a result, research efforts should examine how environmental values are implemented in the organizations in practice, focusing on

environmental managing and reporting system. In order to develop an environmental sustainability culture in the organizations, the environmental values included in codes of ethics need to be transferred into the organizations behaviour through training and communication programs (McKinney et al. 2010). These programs have to underline that the achievement of a long-term competitive advantage is affected by both external and internal factors.

Among the external factors (e.g. the behaviour of other companies, the environmental awareness of consumers and civil society, the conditions of the natural environment and the laws and regulations which the company is subject), the greater social awareness of environmental issues plays a central role, creating a new market for business companies that is more careful in respect to the environmental protection and the proper management of natural resources (Flammer, 2013). This demand raises the pressure exerted by the external parties on the organizations behaviour. More specifically it can be assumed that the main advantage achieved with the environmental sustainability of the firm is an improvement in terms of reputation that results in greater customers' loyalty and attractiveness for the new ones (Du and Vieira, 2012; Chen and Roberts, 2010).

Among the internal factors, we could consider the organization's resources. When a company decides to include an eco-efficient and sustainable growth in its processes it must own specific resources and capabilities. Improving the production in an environmentally sustainable way would mean, for example, decreasing the intensity of the use of raw materials and energy, promoting the recyclability of products that could generate a costs reduction in the long term (Sprinkle and Maines, 2010). In addition, a new theoretical insight considers the environment itself as a strategic resource for the firm (Flammer, 2013; Gibson, 2012).

Environmental sustainability should be improved within the value chain of the companies, to ensure a timely response to the interest of the community in ecology and environment. In fact, a sustainable environmental protection approach would allow companies to achieve a modern competitive advantage (Porter and Kramer, 2006) as they may boast the use of technologically innovative and more environmental respectful production processes that lead to an increase in profit.

Finally, and perhaps most importantly from a policy perspective, regulators (i.e., national and supranational, governmental and non governmental organizations) should provide for stringent enforcement mechanisms for companies that damage the environment and continue in their efforts to disseminate the principles of social and

business sustainability, morally supporting and providing incentives for the development of environmental sustainable corporations.

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