

Anti-bribery and corruption (ABC) systems in the ESG context: What can ABC systems do for ESG and what can ESG do for them?**Ivan Skaloš¹ & Anna Lašáková²****Abstract**

This paper examines the mutually reinforcing relationship between corporate Anti-Bribery and Corruption (ABC) systems and Environmental, Social, and Governance (ESG) frameworks. While research and reporting recognize anti-corruption as a key pillar of ESG, they have not clearly defined how effective ABC systems contribute to ESG. Nor have they explored how ESG's sustainability logic could reshape ABC's design, operations, and communications. This paper draws on academic literature, expert guidance, and regulatory developments. It presents an integrated perspective on sustainable ABC governance, reporting, and performance measurement. First, it explains how strong anti-corruption mechanisms support governance, lower risks, and help achieve environmental and social goals. Next, it analyses how ESG-based principles like leadership commitment, stakeholder engagement, and open reporting can improve the effectiveness and credibility of ABC systems. Drawing on the idea of stakeholder reactivity, it argues that conventional ABC metrics and disclosures may not communicate effectively to all stakeholders, who differ in their analytical skills and motivations. Therefore, it proposes a model for sustainable ABC metrics that blends activity- and impact-based indicators and connects anti-corruption measurement to ESG's governance logic. The paper concludes that more stakeholder-sensitive ABC metrics can improve clarity, accountability, and trust in ABC-related reporting for sustainability governance.

Keywords: anti-corruption, ESG, business ethics, corporate governance, sustainability reporting, compliance effectiveness, ethical resilience

Introduction

In the past decade, sustainable development has become central in the commercial sector. Frameworks for non-financial reporting and sustainability disclosures have developed gradually, and companies now implement sustainability initiatives across ESG domains. For business leaders, adopting such initiatives fosters structured stakeholder engagement and supports a longer-term strategy. Research indicates that these practices may lead to better long-term performance, including stock market valuation and accounting results (Eccles, Ioannou & Serafeim, 2014, p. 2835).

Expert discourse has mainly focused on environmental and social sustainability. Regulatory developments show a similar trend. Public debate emphasizes reducing environmental damage and addressing the social impacts of business. The role and impact of good governance receive less attention. Regulatory frameworks reflect this gap. Environmental and social standards are more detailed and complex, while governance standards are less developed. For example, the EU has five ESRS standards for environmental protection and four for social performance. It has only one for governance (ESRS G1 Business conduct, adopted by the European Commission in 2023). The Global Reporting Initiative (GRI), another key ESG framework, shows a similar imbalance.

Academic research still focuses on governance (Bosi et al., 2022, p. 17; Senadheera et al., 2022, p. 12). Many studies show that leadership, accountability, ethical decision-making, strategy, and good governance are central to sustainability (e.g., Prokopenko et al., 2025, p. 221). This research trend shows that governance is a key factor in management science for achieving sustainability. These findings align with the growing academic and regulatory stress on strategy and governance. This is seen especially in required climate risk disclosures and other recent sustainability mandates in some jurisdictions (Teh & Khan, 2024, p. 43).

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Companies cannot act as credible societal actors unless they build internal integrity (Lašáková & Skaloš, 2025, p. 2). This also applies to their environmental responsibilities. Any corrupt practice undermines the credibility and effectiveness of environmental and social projects. Corruption may allow companies to bypass emission standards, causing greater environmental harm (Salem & Ghazwani, 2026, p. 316; Salem et al., 2023, p. 529). In ESG governance, ABC systems are a core part of a company's governance setup. Fighting corruption is vital for ESG governance. In recent years, the commercial sector has played a bigger role in anti-corruption, a field once led by the public sector (OECD, 2025, p. 3).

Companies have seen that strong ABC systems help ESG performance. As a result, they are integrating environmental and social aspects into their anti-corruption efforts (Kroll, 2022, p. 14). ABC systems make environmental and social initiatives more credible and effective. At the same time, these systems can be reshaped by ESG's wider sustainability logic. The update to ISO 37001:2025 (International Organization for Standardization, 2025, p. 5) stresses the need for strategic integration, leadership, operational embedding, and continuous improvement of ABC systems. These developments indicate that the ESG-ABC relationship is not one-way. Instead, there is a two-way interaction between governance integrity and broader sustainable corporate practices.

ABC systems are now widely seen as core to the ESG governance pillar. Still, the ABC-ESG relationship is not well-defined in the literature or in reporting practice. Rules and research agree that strong ABC systems improve governance and can boost environmental and social performance. Yet, ESG's broader logic may also change how ABC systems are designed, operated, and reported. Both directions have rarely been studied together in an integrated way that considers stakeholder differences. Little attention has been paid to how different stakeholders interpret ABC disclosure metrics and how that affects disclosure effectiveness, accountability, and trust. There is still a gap between rule-based disclosures and a sound model that explains the two-way ESG-ABC relationship and guides more sustainable ABC reporting.

This paper asks: How can the two-way relationship between ESG and ABC systems *be conceptualized to enhance ABC disclosure effectiveness, stakeholder responsiveness, and sustainable governance?*

This paper's objective is to analyse, in a structured way, the two-way interactions between ESG and ABC systems. It uses scholarly literature, expert guidance, and regulatory trends as sources. The paper seeks to explain how effective ABC systems add to governance and sustainability in the ESG context. It also analyses how broad ESG principles can shape the design, use, and reporting of ABC systems. From this analysis, the paper develops a stakeholder-sensitive model for sustainable ABC metrics. This model aims to better reflect anti-corruption performance for different stakeholders. It considers their varying skills, motivation, and responses, and increases the clarity, accountability, and trustworthiness of ABC reporting for sustainability.

Methodology

This paper adopts a conceptual-analytical and normatively oriented methodology. Its purpose is not to empirically test ABC systems, nor to provide a systematic literature review in a strict methodological sense. Rather, the article develops a conceptually structured model of sustainable ABC metrics by combining regulatory analysis, stakeholder-oriented interpretive assessment, and synthesis of relevant academic, expert, and standard-setting sources. Methodologically, the paper addresses both directions of the relationship between ESG and ABC systems: first, by clarifying the contribution of effective ABC systems to governance quality and broader sustainability performance, and second, by examining how ESG's sustainability logic can reshape the design, operation, and communication of ABC systems. The

methodological design corresponds to the paper's structure and proceeds through a sequence of mutually connected analytical steps.

The first step is to identify the current regulatory minimum for ABC-related disclosure within the ESG framework. For this purpose, the paper examines the principal disclosure requirements currently represented at the European level by the ESRS G1 Business Conduct standard and at the global level by GRI 205 Anti-corruption. This part of the analysis aims to establish the baseline level of information that companies are expected to disclose regarding anti-corruption policies, training, incident reporting, risk exposure, and related governance arrangements. This regulatory baseline then serves as the reference point for the subsequent normative and stakeholder-oriented assessment of whether formally compliant disclosure is also substantively adequate from a sustainability-oriented governance perspective. At the same time, this step helps to clarify how current ESG-related reporting frameworks already position ABC systems within the governance pillar of sustainability reporting.

The second step applies a stakeholder-sensitive interpretive lens to this regulatory minimum. Drawing on Slager, Gond, and Crilly's (2021) framework of stakeholder reactivity, the paper examines the dimensions of stakeholder motivation and analytical capacity to illustrate how different stakeholder groups may interpret the same ABC-related disclosures in substantially different ways. On this basis, the article discusses how selected conventional metrics – specifically corruption case metrics and training participation metrics – may produce divergent perceptions among both internal and external stakeholders. Methodologically, this step should be understood as a heuristic and interpretive application of stakeholder theory. It does not amount to empirical simulation or behavioural testing; rather, it is intended to demonstrate analytically why traditional ABC disclosure may fail to build trust uniformly across stakeholder groups and why the informational adequacy of disclosure cannot be judged solely by its formal compliance with reporting requirements.

The third step involves a targeted synthesis of sustainability-related principles relevant to the design, operation, and communication of ABC systems. Here, the paper draws on academic literature, expert publications, and selected normative materials to identify the features of ABC systems most relevant from a sustainability perspective. These include, in particular, the strategic integration of ABC systems into broader governance structures, cross-functional embedding, stakeholder engagement, operational effectiveness, the intelligibility of disclosures, continuous improvement, and the relationship between anti-corruption performance and the environmental and social dimensions of ESG. This step also serves to capture the second direction of the paper's inquiry, namely, the extent to which ESG's broader sustainability logic may inform the substantive development of ABC systems beyond narrowly compliance-based understandings. The purpose of this step is therefore not only to describe existing requirements, but also to clarify which substantive principles should inform a more sustainable model of ABC governance and disclosure.

The fourth step is the article's principal conceptual contribution. Building on the regulatory baseline, the stakeholder-oriented interpretive analysis, and the sustainability principles identified in the literature, the paper develops an illustrative model of sustainable ABC metrics. In doing so, it takes into account several considerations reflected throughout the article: first, that contemporary regulation increasingly requires disclosure not only on the formal existence of ABC systems but also on aspects related to their operational effectiveness; second, that stakeholder groups differ in their capacity to interpret raw compliance data; third, that expert guidance, including that of the OECD and Transparency International, supports the use of more meaningful, risk-sensitive, and effectiveness-oriented indicators; and fourth, that sustainable disclosure should communicate more than mere compliance activity. The resulting model is therefore presented as a *conceptual and illustrative proposal rather than* as a validated measurement instrument. Its function is to show how ABC-related disclosures may be

reformulated to be more intelligible, more stakeholder-relevant, and better aligned with the broader governance logic of ESG, while also demonstrating how ESG considerations can improve the practical and communicative quality of ABC systems themselves.

The final methodological step is to derive normative implications and practical recommendations. Based on the preceding analysis, the paper formulates recommendations for both policymakers and companies operating or refining ABC systems in an ESG environment. These recommendations are not presented as direct empirical findings, but as reasoned implications of the conceptual framework developed in the article. Methodologically, the paper's contribution thus lies in linking regulatory analysis with stakeholder-sensitive interpretation and sustainability-oriented model building to clarify the two-way interaction between ESG and ABC systems and to show how ABC metrics and related reporting can better support accountability, transparency, and trust-based relationships with internal and external stakeholders.

ABC systems as part of the ESG framework

ABC systems address one of the core topics of the governance dimension of ESG. To effectively prevent and detect corruption, an ABC system must be comprehensive and adequately resourced. Depending on their regulatory and business context, companies may choose from a range of established system frameworks when designing their ABC systems. Among the most widely applied are ISO 37001, IDW PS 980, SAPIN II, and COSO II, although numerous other models exist. However, the mere existence of a formally complete ABC system is insufficient. Its individual elements must interact and mutually reinforce one another, be embedded in day-to-day business operations (International Organization for Standardization, 2025, p. 5), and, most importantly, exert a tangible influence on actual organizational behaviour.

Anti-corruption represents a *foundational governance indicator within ESG*. The presence of an effective ABC system signals to external stakeholders that a company is ethically managed, subject to appropriate board oversight, and resilient to legal, financial, and reputational risks arising from corrupt practices. While companies retain discretion in shaping their sustainability disclosures and may voluntarily provide non-financial information beyond regulatory minimums, it is essential to clarify what the current minimum requirements entail.

Within the EU regulatory framework, the G1 Business Conduct Standard requires companies to disclose the existence of robust ABC policies, whistleblower protection mechanisms, investigation procedures, and training programs. Companies must explain how these measures are embedded in corporate culture and governance structures and transparently disclose any gaps, together with implementation plans and timelines. Furthermore, undertakings are required to report on corruption-related risks, incidents, investigations, outcomes, fines, and remedial actions, including coverage of high-risk functions and relevant parts of the value chain. The prevention and detection of corruption and bribery, including incident reporting under G1-3 and G1-4, mutually reinforce G1-1 (Business conduct policies and corporate culture) and G1-5 (Political influence and lobbying activities) (European Commission, 2023, pp. 247-250).

At the global level, the alternative GRI 205 standard structures ABC requirements into three areas: corruption risk assessment (including the proportion of assessed operations and identified significant risks), communication and training (with a focus on employees, officers, and business partners), and identified corruption incidents (including incidence, labour- and commercial-law actions, and litigation) (Global reporting initiative, 2016, p. 8-10). Other ESG frameworks, such as SASB, the SDGs, or the UN Global Compact, do not appear to impose additional substantive requirements in this domain.

While both the European G1 standard and GRI 205 address the substance of corrupt practices, GRI 205 explicitly reconnects corruption with its environmental and social manifestations, including environmental damage, human rights abuses, democratic erosion,

misallocation of investments, and the undermining of the rule of law (Global Reporting Initiative, 2016, p. 4). This reconnection is empirically supported. Research demonstrates that ABC measures can moderate improvements in corporate environmental performance by enhancing transparency, accountability, and compliance with environmental regulations (Sarhan & Gerged, 2023; Hao et al., 2023). Conversely, corruption facilitates regulatory circumvention, such as non-compliance with emission standards, thereby exacerbating environmental harm (Salem & Ghazwani, 2025, p. 316; Salem et al., 2023).

In the social domain, effective ABC systems supported by high-quality disclosures have a direct positive impact on overall sustainability performance. Firms with stronger ABC disclosure quality tend to demonstrate superior sustainability outcomes (Ghazwani et al., 2025, p. 7), reinforcing the effectiveness of individual sustainability initiatives, such as board-level cultural diversity, in enhancing social sustainability. Empirical evidence from V4 SME companies indicates that comprehensive ABC systems with demonstrable management involvement significantly improve positive perceptions of the ESG concept (Belas et al., 2024, p. 533). Comparable findings from the UK confirm the positive relationship between high-quality ABC disclosures and overall sustainability performance (Gerged, Salem & Ghazwani, 2025, p. 2590).

European companies that embed business ethics into their corporate strategy and secure internal stakeholder buy-in are more likely to provide comprehensive, high-quality ESG disclosures (Marzouki, Chouaibi & Amara, 2023, p. 20). In contrast, corporate corruption risk is negatively associated with the extent of ESG reporting. Companies operating in high-corruption-risk environments are less likely to disclose non-financial information, including ABC-related data (Cicchello et al., 2025, p. 739). Similarly, failures in the environmental sphere, such as greenwashing, undermine perceptions of the effectiveness of the ABC system, as such practices are increasingly regarded as corruption (Poiriazi et al., 2025, p. 14). Analogous dynamics may occur in the social sphere, for example, in cases of illegal employment, where corrupt practices aimed at circumventing worker representation can facilitate misconduct. In the governance domain, empirical evidence shows that anti-competition and anti-corruption controversies have a deteriorating effect on overall ESG performance, particularly in the financial sector, where these issues are often intertwined (Zournatzidou et al., 2024, p. 2). Similar patterns are likely to exist in other industries, especially in public procurement, where restrictions on competition frequently coincide with influence peddling and other forms of corruption.

A critical question, therefore, arises: do current ABC disclosures have the capacity to build stakeholder confidence in the effectiveness of ABC systems, and to enhance confidence in corporate efforts to address environmental and social corruption risks?

Evidence suggests that this potential is only partially realized. An analysis of 2021 ABC disclosures by global companies shows widespread use of multiple ESG frameworks, yet only 29% of firms reported independent assurance over their ABC disclosures (International Federation of Accountants, 2023, pp. 6–24). Companies typically provide lengthy narrative disclosures, averaging 997 words, while offering a limited set of meaningful metrics, such as case metrics (37%), alert metrics (25%), and cost metrics (4%) (International Federation of Accountants, 2023, pp. 6–24). This indicates a substitution of extensive narrative explanations for structured and comparable metrics, which may reduce the interpretive value and decision-usefulness of ABC-related reporting, especially given that external stakeholders increasingly rely on combinations of sustainability metrics and qualitative assessments to avoid misleading choices (Arslan, Yener & Akturan, 2025, p. 78). Other studies similarly identify a generally low level of corruption-related disclosure and limited informational depth (Previtali & Cerchiello, 2023, p. 1223), partly attributable to delays in the global implementation and enforcement of anti-corruption legislation.

An additional factor, particularly evident in developed economies, is the tendency of companies to rely on legitimacy advantages derived from a positive public image to substitute for detailed disclosures. Stakeholders often do not consider disclosed information definitive evidence of governance effectiveness unless it is supported by verifiable data (Juliao-Rossi, Losada-Otalora & Católico-Segura, 2023, p. 94), creating a persistent limitation to stakeholder engagement. Furthermore, the information provided to organizational stakeholders (both internal and external) frequently fails to account for differences in stakeholders' capacity to process complex ABC-related disclosures (Slager, Gond & Crilly, 2021, p. 298). To make this problem more analytically explicit, Table 1 presents a stakeholder typology, structured along the dimensions of motivation and analytical capacity, derived from Slager et al.'s stakeholder reactivity framework. The typology serves as the interpretive basis for the subsequent discussion of how different stakeholder groups may respond to conventional ABC metrics.

	Low Capacity	High Capacity
High Motivation	Incremental responders	Substantive responders
High Motivation	<i>Want to act ethically but lack resources or systems.</i> • basic, narrative disclosures • reliance on external consultants • gradual learning and progress focus	<i>Ethics as strategic advantage and cultural value.</i> • detailed, data-driven disclosures • integration of ABC metrics with ESG goals • continuous improvement & stakeholder dialogue
Low Motivation	Indifferent responders	Selective responders
Low Motivation	<i>View disclosure as burden or cost.</i> • minimal, reactive reporting • only respond under pressure (regulatory or reputational) • see ABC compliance as box-ticking	<i>Ethics as PR instrument.</i> • slick but superficial reports • focus on optics and rankings • use ESG reporting to manage perception, not substance

Table 1: (Authors) Stakeholder typology according to their reactivity, based on Slager, Gond & Crilly, 2021.

External stakeholders, as well as professionals analysing sustainability information on their behalf, differ significantly in their responses depending on two key factors: their level of motivation and their analytical (calculation) capacity. The same typology applies to internal stakeholders.

The provision of traditional case-based metrics may therefore be counterproductive in reducing stakeholder uncertainty. Highly motivated stakeholders with limited analytical capacity may misinterpret these metrics, whereas those with greater analytical capacity may require additional contextual information to draw meaningful conclusions. To illustrate these differences more concretely, Table 2 presents a heuristic outline of how four stakeholder types, distinguished by motivation and analytical capacity, may respond to two illustrative ABC metrics: (1) reported corruption cases and (2) general ABC training participation. The table further distinguishes between internal and external stakeholders to show that identical metrics may elicit different interpretive reactions depending on stakeholder type and position within the organization.

Incremental	(High motivation – Low analytical capacity)	
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type / group	Metric 1: Corruption cases (3 vs 5)	Metric 2: Training participation (88% vs 91%)
Internal stakeholders	View reduction as clear moral and compliance progress, interpret numbers at face value, reinforce basic compliance messaging and “zero tolerance” narratives	Express concern over decline, perceive it as failure to meet expectations, push for mandatory attendance and simple controls rather than redesign of training
External stakeholders	Welcome reduction as a signal of improving integrity, rely on headline numbers, may communicate cautious approval but request reassurance	Question decline in participation, may ask for explanations or commitments to restore coverage, rely on company statements rather than independent analysis
Incremental stakeholders want improvement but lack the capacity to contextualize trends or causality.	Incremental stakeholders want improvement but lack the capacity to contextualize trends or causality.	Incremental stakeholders want improvement but lack the capacity to contextualize trends or causality.
Substantive	(High motivation – High analytical capacity)	
type / group	Metric 1: Corruption cases (3 vs 5)	Metric 2: Training participation (88% vs 91%)
Internal stakeholders	Analyse trend quality, detection maturity, reporting culture, and benchmarking, assess whether decrease reflects prevention or under-reporting, initiate root-cause reviews	Disaggregate participation by risk group and geography, assess training effectiveness, not only coverage, redesign content, targeting and incentives
External stakeholders	Interpret reduction conditionally, compare to peers, sector risk, enforcement context, may request deeper narrative and assurance	Probe whether decline signals training fatigue or risk misalignment, expect corrective action plans and evidence of learning outcomes
Substantive stakeholders treat metrics as diagnostic tools, not reputational signals.	Substantive stakeholders treat metrics as diagnostic tools, not reputational signals.	Substantive stakeholders treat metrics as diagnostic tools, not reputational signals.
Selective	(Low motivation – High analytical capacity)	
type / group	Metric 1: Corruption cases (3 vs 5)	Metric 2: Training participation (88% vs 91%)
Internal stakeholders	Acknowledge improvement but deprioritize unless cases threaten operations or reputation, avoid deeper system investments	Accept decline if not legally problematic, may support targeted training only in high-risk units
External stakeholders	Use data opportunistically, positive trends reduce pressure, scrutiny increases only if scandals emerge	Monitor participation mainly as compliance threshold, react only if it affects contractual or regulatory exposure
Selective stakeholders can interpret metrics but engage only when it aligns with other strategic interests.	Selective stakeholders can interpret metrics but engage only when it aligns with other strategic interests.	Selective stakeholders can interpret metrics but engage only when it aligns with other strategic interests.

Indifferent	(Low motivation – Low analytical capacity)	
type / group	Metric 1: Corruption cases (3 vs 5)	Metric 2: Training participation (88% vs 91%)
Internal stakeholders	Consider corruption inevitable or irrelevant, see numbers as compliance formalism, no behavioural change	View decline as operational issue, little concern or ownership
External stakeholders	Barely notice disclosure, lack interest or understanding, rely on surface reputation	No reaction unless issue escalates publicly or legally
Indifferent stakeholders neither demand nor enable meaningful improvement.	Indifferent stakeholders neither demand nor enable meaningful improvement.	Indifferent stakeholders neither demand nor enable meaningful improvement.

Table 2: (Authors) Illustrative stakeholders' reactivity on selected traditional G metrics, based on Slager, Gond & Crilly, 2021.

A closer examination of these responses indicates that identical metrics may trigger dissatisfaction of varying quality and/or intensity. Zero-tolerance incremental stakeholders may demand complete risk elimination without contextual interpretation, while substantive stakeholders may lack sufficient detail of information to initiate appropriate action. The final section of this paper, therefore, proposes a conceptual approach to ABC metrics for sustainability reporting that addresses the identified limitations, disclosure deficiencies, and implicit risk factors discussed above.

Sustainability aspects of deploying and operating ABC systems

Recent research increasingly suggests that ABC systems cannot be designed and operated as isolated compliance mechanisms. Kroll's 2022 study shows that 48% of surveyed organizations recognize the need to incorporate an ESG mindset into the deployment, operation, and communication of their ABC systems (Kroll, 2022, p. 14). This finding reflects a broader shift in corporate practice: ABC systems are not only expected to prevent corruptive misconduct and contribute to long-term organizational sustainability across governance, environmental, and social dimensions, but also to internalize the general ESG logic and rethink their own design in a way that helps them *execute their mission in the long term and with uplifting impact*.

At the governance level, sustainable ABC systems are characterized by resilience and strategic integration. Embedding ABC into the overall governance and risk management architecture strengthens organizational robustness and supports long-term value creation (Gerged, Salem & Ghazwani, 2025, p. 2602). The integration of multiple management systems (such as compliance, risk, quality, environmental, and social management) into an integrated management system (IMS) is increasingly recognized as a key enabler of sustainability. Organizations adopting IMS approaches can achieve substantial cost savings and resource efficiencies, thereby enhancing both economic and organizational sustainability (Malega & Majernik, 2024, p. 84).

From an operational perspective, sustainable ABC systems rely on cross-functional integration, effective internal controls, and continuous system auditing. Cross-functionally integrated solutions ensure that corruption risks are addressed consistently across business units and processes, while system audits support transparency and accountability (Cardoni et al., 2020, p. 1182; Previtali & Cerchiello, 2023, p. 1225). Strong stakeholder engagement further reinforces system effectiveness and sustainability. The Siemens case illustrates how ABC disclosures were reshaped following a major corruption scandal to address the informational needs of both internal (employees) and external (suppliers) stakeholders. By combining transparency, reputational crisis communication, and forward-looking commitments, Siemens sought to restore trust and secure the long-term sustainability of its stakeholder relationships.

(Blanc et al., 2019, p. 554). These stakeholder groups were not only directly affected by the misconduct and subsequent investigations but also critical for the company's future business continuity.

Sustainable ABC communication further requires proportionality and contextual sensitivity. Disclosure policies should be aligned with the nature, size, and geographic footprint of the enterprise, while considering cost considerations, business confidentiality, competitive concerns, and, crucially, actual and foreseeable corruption risk factors (OECD, 2023, p. 21). Such a risk-based disclosure approach supports both transparency and strategic sustainability by avoiding excessive or misaligned reporting while ensuring material risks are adequately addressed.

Beyond firm-level initiatives, sustainability in ABC systems can be strengthened through inter-organizational learning. Peer learning within industries facing similar corruption risks offers opportunities for confidential knowledge sharing, more efficient resource management, and the diffusion of effective practices (OECD, 2025, p. 27). These collaborative approaches enhance collective resilience and contribute to systemic sustainability at the industry level.

Certification and standardization also play an important role. More comprehensive and integrated management systems benefit from accredited certifications that are widely recognized in globalized markets, thereby supporting reputational sustainability and market access (Malega & Majerník, 2024, p. 93). The recent revision of ISO 37001:2025 explicitly reinforces this sustainability orientation. The updated standard strengthens risk assessment and mitigation requirements, incorporates climate change considerations, and calls for deeper integration of compliance systems into organizational core infrastructure (International Organization for Standardization, 2025, p. 5), while still emphasizing proven continuous improvement as one of the key pillars. As a result, certified organizations are required to consider environmental and social factors as contextual risk drivers that may increase bribery risks, reshape incentive structures, or create new corruption-prone interfaces.

Finally, as already indicated, sustainable ABC systems depend on continuous learning and improvement. Organizations are encouraged to implement ongoing reviews and periodic testing of their ABC systems, supported by fair and accurate records that capture both strengths and weaknesses of the system (Morrison et al., 2022, p. 480). Such feedback loops enable adaptive capacity, ensuring that ABC systems remain effective under changing regulatory, environmental, and social conditions. As a final remark, those operating ABC systems need to develop an innovative mindset and the ability to cross-functionally collaborate and partner (Skaloš, 2023, p. 77).

Synthesizing the above considerations, sustainable ABC systems can be conceptualized through the following set of success factors, which are broadly applicable to management systems in general:

1. Strategic leadership & Governance (board commitment, strategic integration)
2. Risk-based system design & Architecture (risk assessment, scalable framework, business integration)
3. Organizational culture & Values integration (cultural transformation, value-based evaluation)
4. Capability building & Knowledge management (workforce development/up-skilling, competency networks)
5. Sustainable resource strategy & futureproofing (financial sustainability, resource optimization models, innovation, business continuity management, resilience)
6. Performance management & Continuous improvement (BI and data analytics, KPIs linked to stakeholder value, benchmarking)
7. Stakeholder engagement & communication (multi-channel communication, collaborative relationships)

Proposed model of ABC system-related metrics

The final sustainability dimension of ABC systems discussed above – stakeholder engagement – cannot be meaningfully achieved without a well-conceptualized, stable, and trustworthy performance measurement framework. Such a framework must ensure data integrity and, ideally, external assurance. At the same time, as demonstrated earlier, ABC disclosures are interpreted by a heterogeneous group of stakeholders who apply different cognitive filters, analytical capacities, and motivational lenses, leading to perceptions that may diverge from the organization’s intended message.

Previous sections highlighted several structural limitations, deficiencies, and risks embedded in current regulatory approaches to ABC metrics. Most notably, the predominantly descriptive nature of existing disclosures limits their ability to demonstrate the actual impact of ABC systems. To be decision-useful, sustainability metrics – including those related to ABC – must be clear, concrete, and directly relevant to understanding the program’s functioning and outcomes (Morrison et al., 2022, p. 482).

From a broader perspective, the performance measurement of business ethics and compliance systems typically follows two alternative logics: assessing value in terms of return on investment (e.g., cost savings or incremental revenues) or assessing operational and behavioural effectiveness (Haugh & Bedi, 2023, p. 20). In practice, an ROI-based approach often proves problematic, as it relies heavily on assumptions that reduce transparency and credibility - except in narrowly defined areas, such as procurement, where the efficiency gains of ABC-related governance measures can be estimated with reasonable accuracy.

In general, *measuring performance in terms of operational effectiveness via a well-conceptualized set of metrics appears more feasible*. In line with this reasoning, OECD methodological guidance advocates the use of a meaningful combination of activity-based and impact-based metrics. These metrics should explicitly reflect a risk-based approach and emphasize behavioural change as the ultimate objective of ABC systems, supported by carefully constructed qualitative narratives (Transparency International, 2021, p. 15; OECD, 2025, p. 21), corresponding with empirical evidence showing that external stakeholders increasingly rely on multiple sustainability indicators and qualitative assessments to avoid misleading interpretations (Arslan, Yener & Akturan, 2025, p. 78). Furthermore, the OECD proposes that the effectiveness of anti-corruption compliance programs be assessed through two complementary lenses: risk-based effectiveness and ethical or behavioural effectiveness (OECD, 2025, p. 15).

Building on these insights and integrating the previously discussed characteristics of sustainable ABC systems with stakeholder reactivity typologies, here we propose an illustrative set of ABC metrics (see Table 3). Table 3 should be understood as a conceptual contribution: it translates the preceding regulatory, stakeholder-oriented, and sustainability-related analysis into an illustrative metric framework intended to communicate operational effectiveness more meaningfully than conventional activity-based disclosures alone:

ABC trainings metrics		Curr. year	Prev. year
Activity-based	ABC training participation	88%	91%
Impact-based	% of employees showing compliant behaviors measured through post-training assessments following the ABC training	76%	69%
Corruption incidents metrics		Curr. year	Prev. year
Activity-based	Corruption cases incidence total	3	5

Impact-based	Corruption cases incidence in already remediated areas	1	0
	Root cause analysis completion rate for alerts received	100%	100%
Whistleblower communication metrics		Curr. year	Prev. year
Activity-based	Incidence of corruption WB reports	3	3
Impact-based	Substantiation rate of reports	65%	73%
	Time-to-resolution for reported concerns (days)	32	29
Third parties' due diligence metrics		Curr. year	Prev. year
Activity-based	Percentage of high-risk third parties subject to enhanced due diligence	95%	92%
Impact-based	Contract terminations due to compliance failure	0	2
Risk assessment metrics		Curr. year	Prev. year
Activity-based	Revenues share covered by corruption risk assessment	93%	87%
Impact-based	Percentage reduction in residual corruption risk score after mitigation measures	25%	20%
Continuous improvement metrics		Curr. year	Prev. year
Activity-based	Action steps from risk assessment, audits, investigations closed within given deadline	80%	100%
Impact-based	Trend (+increase, -decrease) in identified internal control weaknesses vs. previous year	25%	-33%

Table 3: (Authors) Illustrative set of ABC metrics reflecting identified sustainability factors.

Table 3 illustrates how ABC metrics may be structured to be more responsive to stakeholder heterogeneity and to the governance logic of ESG. Impact-based metrics may improve stakeholders' understanding of ABC programs by addressing methodological and behavioural dimensions beyond mere activity reporting. By employing surveys and behavioural assessments in ABC trainings, measuring root-cause remediation and financial value preservation in corruption case management, utilizing psychological safety indicators and substantiation rates in whistleblowing systems, tracking supplier compliance improvement in third-party due diligence, and evidencing reductions in control weaknesses in continuous improvement processes, organizations may communicate program effectiveness more credibly than through activity-based reporting alone.

This comprehensive approach may be relevant across the stakeholder typology proposed by Slager et al. (2021) by helping incremental responders build calculative capacity through structured frameworks, enabling substantive responders to use performance data for benchmarking and continuous improvement, and giving selective responders clearer signals of risk mitigation and potential strategic value. The integration of behavioural change measurement and quantified business value helps connect the ethical aims of governance with organizational performance. In this way, compliance metrics may be repositioned from primarily defensive reporting tools toward more strategic indicators of integrity culture, proactive risk management, and broader governance quality, thereby supporting stakeholder

trust and signalling commitment to anti-corruption objectives beyond regulatory minimalism.

Beyond the considerations, several critical principles warrant emphasis for organizations conceptualizing sustainable ABC metrics. First, proportionality requires that metric design reflect organizational scale, industrial context, and materiality of perceived corruption risks (Mezzanotte, 2023, p. 655), ensuring measurement frameworks align with actual risk exposure rather than generic compliance templates.

Second, narrative disclosures must be systematically reconnected with quantitative metrics to provide contextual interpretation and prevent decontextualized data misinterpretation by diverse stakeholder groups. Thirdly, metrics should demonstrate longitudinal consistency and comparability, reflect the organization's ABC system architecture, while ensure trend analysis that documents system evolution and effectiveness.

Finally, transparency imperatives require deploying consistent metric sets across internal and external stakeholder communications, thereby fostering accountability, reducing information asymmetry, and building stakeholder trust through unified reporting frameworks that resist selective disclosure. These principles collectively help ensure that ABC metrics function as authentic governance instruments rather than symbolic compliance artifacts, supporting both internal management decision-making and external stakeholder assessment of organizational integrity commitments.

Practical implications

Recommendations for Policymakers: within the European regulatory context, accelerating the harmonization of the EU's ESG framework with global sustainability architectures is a critical priority to mitigate fragmentation across diverse, frequently conflicting reporting standards. Establishing unified taxonomies and a common sustainability performance language would substantially reduce incompatibility risks, minimize stakeholder confusion, and curtail opportunities for strategic avoidance, misrepresentation, or greenwashing, thereby enhancing clarity for both corporate reporters and institutional investors.

Policymakers should incentivize robust reporting frameworks grounded in meaningful business ethics metrics while discouraging reliance on traditional activity-based indicators that risk misperceptions among stakeholders and superficial compliance. Furthermore, regulatory development should prioritize high-quality, sector-specific standards (inspiration could be drawn from the SASB framework) that differentiate governance requirements by industry context while systematically integrating environmental and social considerations to accurately identify material corruption risks across distinct operational environments.

Recommendations for Commercial Organizations: corporate ABC system measurement frameworks must transition from activity-based to impact-based metrics, encompassing emerging dimensions such as program continuous improvement, all predicated upon robust data governance infrastructure - a challenge pervading ESG domains beyond governance alone. Compliance functions should collaborate closely with broader ESG initiative streams to conceptualize sustainability reporting on a unified methodological foundation and jointly address fundamental challenges in data availability, integrity, and analytics capability.

Additionally, compliance functions must advance their competency models by emphasizing soft skills essential for internal stakeholder engagement (Skaloš, 2023, p. 73), thereby securing organizational buy-in and support for ABC systems through demonstrated commitment, authentic tone from the top, and adequate resource allocation that transcends symbolic compliance toward substantive integrity culture.

Conclusion

This paper argues that ABC systems and ESG frameworks stand in a two-way relationship that extends beyond traditional compliance paradigms. The discussion shows that effective ABC

systems not only strengthen the governance pillar of ESG but also enhance environmental and social performance by preventing regulatory circumvention and fostering organizational integrity. Conversely, integrating ESG sustainability logic into ABC system design through strategic leadership, cross-functional collaboration, and continuous improvement may transform these mechanisms from reactive controls into proactive enablers of long-term organizational resilience.

The proposed model, which distinguishes between activity-based and impact-based indicators while accounting for stakeholder analytical capacity and motivation, addresses critical deficiencies in current disclosure practices. By bridging compliance effectiveness with sustainability performance and providing actionable guidance for both policymakers and practitioners, this article reframes ABC systems as strategic components of sustainability-oriented governance, contributing to more credible, transparent, and ethically grounded corporate governance in an increasingly sustainability-focused business environment. More specifically, it suggests that stakeholder-sensitive ABC metrics and related reporting can strengthen the intelligibility, accountability, and trust-building potential of anti-corruption communication within ESG governance.

As for the limitations of the present study, the first concerns its methodological design. The paper adopts a conceptual and normative analytical approach rather than an empirical research design, and the proposed model should therefore be understood as illustrative rather than empirically validated. Second, the analysis is anchored primarily in the EU ESRS G1 standard and the GRI 205 anti-corruption standard. Although these frameworks represent influential reference points in contemporary sustainability reporting, they do not fully capture the diversity of governance, regulatory, and compliance environments across jurisdictions and industries. Third, the stakeholder reactivity framework is applied heuristically and interpretively, not through direct behavioural testing. Future research should therefore focus on empirically assessing and refining the proposed ABC performance measurement model, including its applicability across different organizational, sectoral, and regulatory contexts.

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