



Law Provides Liability, Public Relations Provides Prevention: How National Culture and Implementation Gaps Moderate the Institutionalization of Legal Ethics Evidence from Racial Harassment and Oil Sector

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ABSTRACT

While laws like Equality Act 2010, Title VII, EU Racial Equality Directive 2000/43, AGG, FCPA and UK Bribery Act impose liability, organisations still exhibit ethical failures, including racial harassment such as managers threatening brown employees with cane/whip based on colour. This paper examines why formal ethics codes fail to prevent informal misconduct, focusing on national culture as moderator and implementation gap. Using mixed-methods data from 600 ethics and PR professionals across six countries and 45 interviews, we find individualism positively moderates PR ethics effectiveness [$\beta=0.14$, $p=0.012$] while power distance negatively moderates [$\beta=-0.18$, $p=0.003$], supporting Habermas ideal speech and Hofstede. Qualitative findings reveal 60% report implementation gap - formal code modified but informal behaviour persists when enforcement weak, despite reasonable steps defence under Equality Act s109 and adequate procedures under Bribery Act s7. We introduce construct legal ethics [internal: confidentiality, competence, conflict; external: regulatory compliance, substantive justice] and argue PR bridges law and ethics, translating CSRD, CSDDD, EITI, UNGPs into prevention via zero-tolerance policies, training and disciplinary communication. Contribution: A study linking legal ethics, culture and harassment prevention through PR.

Keywords: Legal Ethics, Organisational Ethics, Hostile Work Environment, Equality Act, Power Distance, Implementation Gap, Racial Harassment, Oil Companies, EITI.

CHAPTER ONE

INTRODUCTION

This study will address three gaps in public relations ethics research [Bowen 2008; Grunig et al. 2002]. While Bowen theorized public relations as organizational conscience, there is no quantitative international test, no extension to legal framework modification introducing legal ethics construct, no sector comparison across public, private and oil, no test of legal strength as moderator nor crisis as mediator providing dominant coalition access. Using mixed-methods $N=600+45$ across 6 countries, we test H1-H5 and explain implementation gap where formal codes fail to prevent informal racial harassment violating Equality Act s26, s109, Title VII Meritor/Harris, AGG s12 and Directive 2000/43. The study will also provide quantitative validation of Bowen's theory $\beta=0.68$ $R^2=0.50$, extends to legal framework $\beta=0.62$ and show the sector differences oil, private and public $F=28.43$, moderation $\beta=0.19$ high vs low legal strength 0.71 vs 0.38, mediation indirect 0.21 as it will address the pronounced state of neglect in business environment or organizational operations.

The aim of the Study

The aim of the study is to address four different gaps in JBE and legal ethics literature, like: 1. Construct gap: Luban legal ethics focuses internal but not external regulatory compliance and substantive justice required for



business ethics; no integrated construct. 2. Implementation gap: Kaptein and Treviño show codes often decoupled - formal modified but informal racial harassment persists [e.g., managers threatening brown employees with cane/whip based on colour] - 60% gap in our Article 1 data - why? 3. Cultural gap: Hofstede culture moderation not tested for legal ethics institutionalization - does high Power Distance [France 68] block speaking up vs low PDI [Norway 31, USA 40] enable? 4. Sector gap: Oil sector high moral intensity [IPIECA, EITI 2023, UNGPs, Paris, CSRD 2022/2464] requires joint HR+PR+Legal protocol for whistleblower hotline per EU Whistleblower Directive 2019/1937 Art 8 to avoid liability.[confidentiality][competence] Practical aim: To develop culture-sensitive legal ethics institutionalization model* and joint protocol to prevent hostile work environment and document reasonable steps, and to provide EITI/CSRD co-drafting best practice to avoid parent liability and greenwashing.

Research Questions[6 RQs]

RQ1 : Construct Development and Validation: What is Legal Ethics as distinct from business ethics and legal compliance, how can it be operationalized as internal plus external [regulatory compliance: Bribery Act s7 adequate procedures, FCPA, Equality Act s109 reasonable steps, AGG s12, SOX, CSRD/CSDDD, EITI, UNGPs, Whistleblower Directive] and substantive justice [fair treatment, dignity, anti-harassment], and to what extent does this construct have convergent and discriminant validity? [confidentiality] [competence] [conflict].

Novel contribution: Scale development 14 items $\alpha=0.90$, CFA CFI=0.92 RMSEA=0.06, bridging Luban 2020 and Mason 2021 and Bowen 2008. Addresses JBE call for law and business ethics integration.

RQ2 : Implementation Gap - Why Formal Codes Fail: To what extent does implementation gap exist between formal legal ethics codes being modified and informal behaviour persisting e.g., racial harassment threats with cane/whip based on colour creating hostile environment violating Equality Act s26, Title VII Meritor/Harris severe or pervasive, AGG s12, Directive 2000/43, and what factors explain this gap?[decoupling] [existence][training]

Corresponds to H1: Implementation gap 60% report formal modified but informal persists, loses reasonable steps defence, adequate procedures, Faragher defence. Uses qualitative Theme 2 and quantitative gap measure $M=2.89$ $SD=1.02$.

RQ3: National Culture Moderation - Power Distance and Individualism: How do Hofstede cultural dimensions moderate the relationship between PR role as conscience and legal ethics institutionalization? Specifically, does Power Distance negatively moderate [high PDI blocks speaking up] and Individualism positively moderate [high Individualism enables speaking up]?

Corresponds to H2a: Power Distance moderation $\beta=-0.18$ LLCI -0.28 ULCI -0.08, H2b: Individualism moderation $\beta=0.14$ LLCI 0.04 ULCI 0.24. Process Macro Model 1. Compares USA 91 Individualism 40 PDI, UK 89/35, Netherlands 80/38, Norway 69/31 vs France 68 PDI high, Germany 35/67.

RQ4 : Legal Enforcement Strength and Implementation Gap Interaction: How does legal enforcement strength [CPI, World Bank Rule of Law, OECD] interact with implementation gap? Does strong enforcement reduce gap by incentivizing documentation of reasonable steps s109, adequate procedures s7, Faragher corrective action, while weak enforcement increases decoupling?

Corresponds to H3: Moderated mediation: Legal strength negatively moderates implementation gap $\beta=-0.22$ $p<0.001$. High enforcement reduces gap $M=2.41$ vs low $M=3.38$ $F=18.21$ $\eta^2=0.06$.

RQ5 : Sector and Oil-Specific - EITI/CSRD Co-drafting: In oil sector high moral intensity, how does PR-Legal co-drafting of EITI Standard 2023, UNGPs human rights due diligence, Paris climate disclosures, CSRD/CSDDD 2022/2464, GRI, SEC climate rule contribute to legal ethics institutionalization and avoidance of parent liability Bodo v Shell and Vedanta v Lungowe and greenwashing litigation Rule 10b-5?



Corresponds to H4: Oil sector legal ethics institutionalization higher when PR-Legal co-drafting high $M=4.12$ vs low co-drafting $M=3.48$ $t=6.34$ $p<0.001$. Qualitative Theme 4 90% oil.

RQ6: Best Practice Protocol - How to Institutionalize: What joint HR+PR+Legal best practice protocol institutionalizes legal ethics and documents reasonable steps defence under Equality Act s109(4) [training, policy, prompt investigation, discipline, communication], adequate procedures under Bribery Act s7 [six principles], Faragher affirmative defence [prompt corrective action], AGG s12 measures, and protected hotline under EU Whistleblower Directive 2019/1937, while being culturally sensitive to Power Distance? Qualitative RQ, develops 5-step protocol and culture-sensitive hotline model.

Research Objectives [7 Objectives]

RO1: To conceptually develop and empirically validate novel Legal Ethics construct integrating internal and external dimensions, 14-item scale, test reliability $\alpha=0.90$, CR=0.90, AVE=0.52, CFA, HTMT discriminant. [Luban][Mason]

RO2: To measure implementation gap between formal and informal legal ethics and test prevalence [60% report gap], causes [decoupling, high PDI, weak enforcement, lack of PR-Legal co-drafting].

RO3: To test national culture moderation using Hofstede Power Distance and Individualism scores for 6 countries as country-level moderators and perceived cultural values as individual-level, using Process Macro Model 1 interaction β , simple slopes at $\pm 1SD$, Johnson-Neyman significance regions.

RO4: To test legal enforcement strength moderation on implementation gap and on PR, Legal Ethics relationship, using both objective indicators [CPI 2023, Rule of Law 2023, OECD Public Integrity] and perceived 4-item scale $\alpha=0.86$, triangulated.

RO5: To compare oil vs private vs public sectors on legal ethics institutionalization and test effect of PR-Legal co-drafting for EITI/CSRD/GRI using t-test and ANOVA, and thematic analysis of 45 interviews.

RO6: To explain why racial harassment e.g., threats with cane/whip persists despite codes violating Equality Act s26, s27, Title VII Meritor 477 U.S. 57 Harris 510 U.S. 17 severe or pervasive, AGG s12, Directive 2000/43 Art 2(3) harassment is discrimination, and how this loses s109 reasonable steps, s7 adequate procedures, Faragher defences leading to unlimited compensation s124 Equality Act and EEOC enforcement.

RO7: To propose culture-sensitive joint HR+PR+Legal protocol and hotline model per Whistleblower Directive Art 8 for JBE practical implications, aligned with UNGPs, EITI, OECD, IPIECA, EHRC Guidance 2023.

Hypotheses

H1: Implementation Gap Hypothesis: There is significant decoupling between formal legal ethics modification and informal behaviour, with 60% of professionals reporting formal codes modified but informal racial harassment persists. Gap larger in high Power Distance and weak enforcement contexts, causing loss of statutory defences.

H2a : Power Distance Negative Moderation: Power Distance negatively moderates PR $\rightarrow$ Legal Ethics institutionalization relationship $\beta=-0.18$ LLCI -0.28 ULCI -0.08. In high PDI [France 68], PR ethics counsel less effective as employees fear challenging managers, speaking up blocked.

H2b : Individualism Positive Moderation: Individualism positively moderates PR $\rightarrow$ Legal Ethics $\beta=0.14$ LLCI 0.04 ULCI 0.24. In high Individualism [USA 91, UK 89], speaking up more likely, legal ethics institutionalizes.

H3: Legal Enforcement Moderation on Gap: Legal enforcement strength negatively moderates implementation



gap $\beta = -0.22$ $p < 0.001$. High enforcement [USA][UK] reduces gap $M = 2.41$ vs low enforcement $M = 3.38$ $F = 18.21$ $\eta^2 = 0.06$ because organizations document reasonable steps to avoid liability.[Norway]

H4 : Oil Sector Co-drafting Hypothesis: In oil sector, PR-Legal co-drafting EITI/CSRD/GRI significantly increases legal ethics institutionalization $M = 4.12$ vs low co-drafting $M = 3.48$ $t = 6.34$ $p < 0.001$ $d = 0.82$ large effect, and reduces parent liability risk and greenwashing litigation.

H5 : Joint Protocol Effectiveness: Organizations with 5-step joint HR, PR and legal protocol like policy co-drafting, training, protected hotline, prompt investigation, discipline, zero-tolerance communication and documentation shows lower implementation gap and higher reasonable steps documentation, thus higher likelihood of establishing s109, s7, Faragher defences [measured via vignette experiment: protocol present vs absent, liability judgment].

CHAPTER 2

LITERATURE REVIEW

Introduction

This chapter synthesizes four streams: Public Relations ethics and organizational conscience theory Bowen, ethics institutionalization and implementation gap decoupling, legal frameworks and statutory defences reasonable steps, adequate procedures, Faragher, parent liability Bodo and greenwashing SEC, legal ethics construct bridging Luban and Mason, sector differences moral intensity and stakeholder salience, national culture Hofstede Power Distance Individualism and voice, legal strength institutional theory responsive regulation, crisis dominant coalition legitimacy. It identifies pronounced gaps: state of neglect 16 years no quantitative validation Bowen, no legal ethics construct, no sector comparison public private oil, no culture moderation, no enforcement moderation, no experimental test reasonable steps. Structure: 2.2 PR ethics conscience theory, 2.3 Four theories integration systems stakeholder dialogical institutional, 2.4 Ethics institutionalization and implementation gap, 2.5 Legal frameworks statutory defences, 2.6 Legal ethics bridging Luban Mason, 2.7 Sector differences public private oil, 2.8 National culture Hofstede voice, 2.9 Legal strength enforcement, 2.10 Crisis dominant coalition legitimacy, 2.11 Conceptual framework and hypotheses, 2.12 Gaps summary.

Public Relations Ethics and Organizational Conscience Theory State of Neglect

Public relations role as organizational conscience introduced by Neff 1989, Ryan and Martinson 1983, and developed by Bowen 2008 as ethical decision-making framework using Kantian deontology. Bowen defined organizational conscience as PR providing ethical analysis, facilitating ethical decision-making, counseling dominant coalition, acting as moral advocate. Bowen 2008, public relations review conceptual argued public relations should be the conscience because public relations sits at boundary scanning stakeholders, understands public interest, can counsel CEO. Using qualitative interviews with 39 senior public relations managers in USA, Bowen found public relations aspires to be conscience but lacks power, excluded from dominant coalition, ethics counsel role inconsistent. Bowen 2009 Journal of Mass Media Ethics extended, dominant coalition membership required for ethics counsel effectiveness. Without access, PR cannot influence.

Bowen 2012, encyclopedia of public relations argued that state of neglect like public relations ethics research dominated by practitioner anecdotes, no quantitative scale, US-centric. Grunig et al. 2002 says excellence theory like public relations should be part of dominant coalition, two-way symmetrical communication ethical. Problem shows that despite theory prominence, no quantitative scale developed to measure public relations as conscience, no international validation, no test of whether public relations modifies ethics and legal frameworks, no sector comparison, no moderation mediation. Literature review of 2000 to 2024 public relations ethics, 78% qualitative, 12% conceptual, 10% quantitative but using proxy e.g., ethics code existence and not public relations role. This is pronounced gap. Recent calls like Fawkes 2015 Journal of media ethics, need quantitative ethics, Bowen 2020, need test across cultures and enforcement. Hence, this study contributes



to the develop 8-item public relations conscience scale $\alpha=0.91$ building on Bowen dimensions, ethical analysis, stakeholder perspective, counseling top management, facilitating decision.

Systematical Literature Reviews are as follows :

Step 1: Construct definition and domain specification .Literature review Luban 2020 Mason 2019 legislation Equality Act Bribery Act Title VII Faragher AGG Directive 2000/43. Whistleblower Directive CSRD CSDDD EITI UNGPs SEC SOX case law Bodo Vedanta EHRC Code. Defined 3 dimensions above.

Step 2: Item generation - Initial pool 32 items. Internal: 12 items from Luban duties confidentiality competence conflict + AGG s12 Whistleblower Art 8/16. External Regulatory: 12 items from s109 reasonable steps checklist EHRC, s7 six principles, Faragher two prongs, CSRD CSDDD EITI, SOX FCPA. External Justice: 8 items from s26 s27 Directive 2000/43 Meritor Harris dignity. Format 5-point Likert 1=strongly disagree 5=strongly agree.

Step 3: Expert assessment - Content Validity CVI.12 experts: 4 legal scholars equality law, 4 business ethics, 2 PR ethics Bowen network, 2 practitioners oil EITI. Rated relevance 1-4. CVI item-level I-CVI threshold 0.78. 8 items deleted I-CVI 0.58-0.75 [too CSR, too generic]. 24 retained S-CVI/Ave=0.91 excellent.

Step 4: Cognitive interviews: n=10 managers USA UK Germany think-aloud, refined wording cane/whip example clarified as threat based on colour, anonymous hotline vs confidential.

Step 5: Pilot testing EFA n=80 Sample: 80 managers not in main study, UK/USA, 30 public 25 private 25 oil. EFA principal axis factoring promax KMO=0.82 Bartlett p.0.001. 3 factors eigenvalue , 1 scree, 6 items cross-loading , 0.40 deleted. Final 18 items loading 0.62-0.86. α internal 0.81 external reg 0.85 justice 0.79.

Step 6: Main study CFA N=600 - Confirmatory and second-order CFA first-order 3-factor: CFI=0.93 TLI=0.92 RMSEA=0.06 SRMR=0.05 $\chi^2/df=2.34$. Second-order: Legal Ethics $\rightarrow$ internal $\lambda=0.78$ external reg $\lambda=0.89$ external justice $\lambda=0.82$ CFI=0.92 TLI=0.91 RMSEA=0.06 SRMR=0.05 $\chi^2/df=2.41$. Fit acceptable Hu & Bentler.

Step 7: Convergent and Discriminant Validity Convergent: AVE internal 0.54 external reg 0.56 justice 0.57 second-order 0.52 all 0.50. CR 0.84-0.90 , 0.70. Loadings 0.68-0.84. Discriminant: Fornell-Larcker AVE , r^2 : internal-external reg $r=0.62$ $r^2=0.38$ AVE 0.54, 0.38 PASS. HTMT: internal-external reg HTMT=0.71 internal-justice 0.52 external reg-justice 0.68 all 0.85 conservative Henseler PASS substantial discriminant. Cross-loadings: item loads own 0.20 than other Model comparison: 3-factor vs 1-factor $\Delta CFI=0.13$, 0.01 PASS Correlation with other constructs in nomological network: PR Role $r=0.59$ Legal Ethics, Ethics institutionalization $r=0.58$, Implementation Gap $r=-0.52$ - expected direction.

Step 8: Measurement Invariance Across Countries and Sectors : Tested invariance across 6 countries grouped low PDI UK USA Germany Netherlands Norway vs high PDI France, and across 3 sectors, and gender. Configural invariance: same factor structure CFI=0.92.Metric invariance: loadings constrained $\Delta CFI=0.008$ <0.01 PASS - meaning items interpreted similarly. Scalar invariance: intercepts constrained $\Delta CFI=0.009$ <0.01 PASS - meaning means comparable. Therefore, cross-country comparison valid. Country-level replication: PDI moderation replicated with objective country scores Hofstede not just perceived.

PR as Organisational Conscience

Bowen defines PR as corporate conscience - ethical guardian bringing stakeholder values into decisions. Main anchor theory. Pearson argued PR plays major role managing moral dimension. Fitzpatrick role in institutionalization of ethics. Neill & Drumwright PR professionals as organisational conscience.

Systems Theory: Public relations as boundary spanner, spanning organisation-environment, bringing external values such as EITI, UNGPs, Paris, Black Lives Matter inside,[Luhmann].



Stakeholder Theory [Freeman & Gilbert, 1988], argues that corporate strategy must reflect stakeholder values axioms. Public relations manages stakeholder's relationships in human relations public and private administrative chain.

Dialogical Theory Habermas, 1984 ideal speech, Kent & Taylor, 2002, both argues that two-way open honest is where participants have equal freedom to challenge agenda. Excellence Theory: This represents ethics as stand-alone measure of excellent public relations as argued by Grunig.

Bowen model: Stage 1 Compliance [obey because must] -> Stage 2 Legal Ethics [obey spirit avoid loopholes] Stage 3 Integrity [self-regulation beyond law]. PR is catalyst.

Legal Framework International

Legal framework defined as multilayered system: Layer 1 International - UNGPs 2011 Protect Respect Remedy, EITI Standard 2019 57 countries revenue transparency, OECD Guidelines MNEs 2023, OECD Integrity Handbook 2020, Paris Agreement 2015. Layer 2 Regional - GDPR 2018 Art 88 employment, CSRD 2022 double materiality 50k EU companies, CSDDD 2024 due diligence, EU Whistleblower Directive 2019/1937, EU Transparency Directive 2019/1024, EU Directive 2000/43 Racial Equality, OECD Anti-Bribery. Layer 3 National - US FOIA 1966, SOX 2002 s406 code, FCPA 1977, Clean Water Act 1972, Oil Pollution Act 1990, Whistleblower Protection Act 1989; UK FOIA 2000, Companies Act 2006 s172, Equality Act 2010 s26 harassment s27 victimization s39 s109 reasonable steps, Bribery Act 2010 s7 adequate procedures, Petroleum Act 1998; Germany AGG s12, Basic Law. Layer 4 Case Law - Meritor Savings Bank v Vinson 477 U.S. 57 hostile work environment, Harris v Forklift 510 U.S. 17 severe or pervasive, Kiobel v Royal Dutch Petroleum 569 U.S. 108 extraterritorial, Bodo Community v Shell UKSC 2021 parent liability. Layer 5 Self-Regulatory - Code of Conduct, PRSA Code, IPIECA, ISO 37001, GRI Standards. 7 components: Establishment, Compliance, Employment, Anti-Corruption, Environmental, Communication, Enforcement.

Definition of Legal Ethics

Legal Ethics in a business organizations is defined as the institutionalization of both internal professional duties of the legal function and external duties toward regulatory compliance and substantive justice, ensuring that legal conduct serves both organizational legitimacy and societal dignity. Business ethics asks what is right, regulatory compliance asks what is legal, CSR asks what is discretionary, organisational ethics asks what is cultural, substantive justice asks what is fair outcome; Legal Ethics asks what is legally competent, confidentially protected, regulatorily defensible, and substantively just - integrating Luban internal and Mason external.

Operational Definition as Regards to this Study

- i. **Dimension 1:** Internal Legal Ethics [Luban 2020] - 5 items $\alpha=0.84$. Duties owed by legal/HR function internally to organization and employees as well as clients, such as the followings:
- ii. **Confidentiality:** Protection of whistleblower identity per Whistleblower Directive 2019/1937 Art 16, secure storage, need-to-know, prohibition retaliation Art 19.
- iii. **Competence:** Legal knowledge to advise on Equality Act s109 reasonable steps, Bribery Act s7 six principles, Title VII Faragher, AGG s12, CSRD/CSDDD, EITI Standard 2023, SEC Rule 10b-5, SOX 302/404, UNGPs.
- iv. **Conflict avoidance:** Independence of investigation, avoiding self-review, external counsel where parent liability risk Bodo v Shell, Vedanta.
- v. **Loyalty and zealous advocacy within bounds:** Advising dominant coalition ethically, not facilitating cover-up cane/whip threats.
- vi. **Communication to client:** Clear advice to board on liability s124 unlimited Vento.
- vii. **Dimension 2:** External Regulatory Compliance [Mason 2019 + regulatory literature] - 5 items $\alpha=0.87$. Duties owed externally to regulators and law - documentation and procedures that satisfy statutory defences.



Equality Act 2010 s109(4) reasonable steps: policy, training, hotline, prompt investigation, discipline, communication [EHRC Code 2023 para 7.15]. Bribery Act 2010 s7 adequate procedures six principles proportionality top-level commitment risk assessment due diligence communication training monitoring. Title VII Faragher affirmative defence: reasonable care prevent/correct + employee unreasonably failed to use. AGG Germany s12 measures necessary to protect. Whistleblower Directive 2019/1937 Art 8 channel Art 9 follow-up 3 months Art 16 confidentiality. CSRD 2022/2464 double materiality limited assurance, CSDDD 2024/1760 supply chain due diligence, EITI Standard 2023 transparency multi-stakeholder, GRI, SOX, FCPA, SEC climate rule.

i. Dimension 3: External Substantive Justice [Mason 2019 + substantive justice] - 4 items $\alpha=0.82$. Duties owed externally to society and stakeholders beyond compliance - fairness and dignity. Fair treatment regardless race colour Directive 2000/43/EC Art 2(3) harassment is discrimination. Prevention hostile environment s26 Equality Act, severe or pervasive Meritor 477 U.S. 57 Harris 510 U.S. 17. Prevention victimization s27 Equality Act, Whistleblower Directive Art 19 protection. Dignity Luban human dignity, zero-tolerance cane/whip threats based on colour, proactive inclusion.

ii. Higher-order: Legal Ethics $\alpha=0.90$ CR=0.90 AVE=0.52 CFI=0.92 RMSEA=0.06 SRMR=0.05 all items loading 0.68-0.84 first-order λ internal 0.78 external reg 0.89 external justice 0.82 on second-order.

Precise Distinction Table : How Legal Ethics Differs

Definition Focus Scope: Example indicator and how legal ethics differs from legal ethics, meaning institutionalization of internal professional duties, external regulatory, substantive justice law, justice integrated, legal function and organization society. Document reasonable steps s109, train, anonymous hotline, fair treatment regardless colour, integrative bridges internal and external. Business ethics is defined as what is right or wrong in business environment as argued by Treviño Weaver. Morality and Organization conduct, code of conduct, ethics training. Business ethics does not include lawyer duties confidentiality competence, conflict, statutory defences s109 s7 Faragher, regulatory compliance and adherence to law. Law as rule to Checklist, have equality Act policies such as, Bribery Act policy.

Compliance is checkbox existence; Legal Ethics requires institutionalization communication awareness training enforcement reporting discipline observed behavior + justice beyond law. CSR Discretionary responsibility to society Carroll pyramid Philanthropy sustainability External voluntary Donations, EITI reporting, CSRD sustainability report CSR voluntary and external; Legal Ethics mandatory internal + regulatory + justice, includes internal confidentiality competence. Organisational Ethics / Ethical Culture. Shared values norms Kaptein Treviño Culture Informal systems Ethical virtues clarity congruency supportability Org ethics is informal culture; Legal Ethics includes formal legal duties documentation for defences and substantive justice.

Substantive Justice: Fair outcomes regardless procedure Mason Justice outcome Society No discrimination regardless race, zero tolerance cane/whip Substantive justice is only one dimension of Legal Ethics [our Dimension 3]; Legal Ethics also includes internal duties and regulatory documentation.

Theoretical Integration: Four Theories Explaining PR, Ethics and Legals

The researcher integrated four different theories used fragmentally in public relations ethics but never together.

Systems Theory - von Bertalanffy 1968, Cutlip Center Broom 2000

Organization as open system interacting with environment via inputs outputs feedback. PR as boundary spanner scans environment legal regulatory stakeholder expectations and brings into organization subsystem, modifying ethics and legal frameworks. Systems explains why PR modifies: to maintain homeostasis and adapt to environment. Supports H1 and H2.



Stakeholder Theory - Freeman 1984, Mitchell Agle Wood 1997 Salience :Stakeholder salience power legitimacy urgency determines attention. High moral intensity sector oil stakeholders more salient due to power to sue parent liability Bodo, legitimacy EITI UNGPs, urgency climate CSRD. Therefore PR modification stronger in oil than private than public because stakeholder pressure stronger. Supports H3 sector differences Oil sector private sector and public sector. Also explains legal ethics substantive justice dimension - fair treatment of stakeholders regardless race.

Dialogical Theory - Habermas 1984 Theory of Communicative Action, Kent Taylor 2002 Dialogic.: Ethical organization requires ideal speech situation free from coercion, inclusion of all voices, orientation to mutual understanding. PR facilitates dialogue between employees, management, legal, HR, stakeholders to co-draft codes, hotline. High Power Distance blocks ideal speech, fear. Low PDI enables. High Individualism enables voice. Supports H2a H2b culture moderation Power Distance negative Individualism positive.

Institutional Theory, Meyer & Rowan 1977 Decoupling, DiMaggio Powell 1983 Isomorphism : Organizations adopt formal structures for legitimacy via coercive isomorphism law, mimetic peers, normative professional standards. But may decouple formal from informal to preserve efficiency and implementation gap. Legal enforcement strength coercive pressure reduces decoupling because need to avoid liability document reasonable steps. PR-Legal co-drafting reduces decoupling by communicating and institutionalizing. Supports H4 moderation legal strength, H1 gap, H3 H4 co-drafting. Integration like systems explains input, stakeholder explains why variation across sectors, dialogical explains how culture moderates communication, institutional explains gap and enforcement moderation and legitimacy seeking during crisis.

Ethics Institutionalization and Implementation Gap, Decoupling

Kaptein 2008: Corporate Ethical Virtues Model: 8 virtues clarity, congruency management, feasibility, supportability, transparency, discussability, sanctionability. Code existence alone insufficient - need institutionalization. Treviño Weaver 2003: Managing Ethics in Business Organizations: Formal vs informal systems, decoupling where formal code exists but informal culture rewards opposite. Measurement: Kaptein Ethical Virtues scale, Treviño ethical culture. Implementation gap empirical: 30-60% organizations report gap. Reasons: middle manager resistance, tick-box training, fear victimization, lack communication, lack leadership commitment. This study focus racial harassment: Formal anti-harassment policy exists but informal threats with cane/whip based on colour persists - hostile environment s26 Equality Act, severe or pervasive Meritor Harris Title VII, AGG s12, Directive 2000/43 Art 2(3). Why? Managers not trained, hotline not promoted, investigation delayed, victimization s27. Gap causes loss statutory defences: Equality Act s109(4) reasonable steps, Bribery Act s7 adequate procedures, Faragher reasonable care, AGG s12. EHRC Code 2023 para 7.15: policy alone not reasonable steps need training, hotline, prompt investigation, discipline, communication. Contribution: Quantify gap 60%, explain via culture and enforcement and co-drafting.

Legal Frameworks and Statutory Defences - Law Provides Liability 2.5.1 Equality Act 2010 UK

s26 Harassment: unwanted conduct related to protected characteristic race including colour violating dignity creating hostile environment. Cane/whip threat based on colour qualifies. s27 Victimization: subjecting person to detriment because complained about harassment. s109 Employer liability: Employer liable for employee act in course of employment unless employer shows took all reasonable steps to prevent harassment s109(4). Reasonable steps interpreted Jones vs Tower Boot: training, policy, hotline, investigation, discipline, communication. Compensation s124 unlimited: Vento injury to feelings bands 2024 less serious £1,100-£11,700 middle £11,700-£35,200 more serious £35,200-£56,200 plus financial loss plus personal injury. EHRC Employment Code 2023.

Title VII USA : Meritor Savings Bank v Vinson 477 U.S. 57 1986 hostile environment if severe or pervasive, Harris v Forklift 510 U.S. 17 1993 objective and subjective hostile. Faragher v City of Boca Raton 524 U.S. 775 1998 and Burlington Industries v Ellerth 524 U.S. 742 affirmative defence: employer exercised reasonable care to prevent and correct harassment and employee unreasonably failed to use preventive/corrective opportunities. Requires policy, training, complaint procedure, prompt investigation, corrective action. EEOC Enforcement Guidance.



AGG Germany and Directive 2000/43/EC: AGG s12 employer must take measures necessary to protect employees including training s12(2). Directive 2000/43 Art 2(3) harassment is discrimination. Directive 2000/78.

Bribery Act 2010 s7, FCPA, SOX : s7 failure of commercial organization to prevent bribery unless adequate procedures: six principles - proportionality, top-level commitment, risk assessment, due diligence, communication training, monitoring review. Similar logic to reasonable steps. FCPA anti-bribery, accounting provisions, SOX 302/404 certification, SEC enforcement.

EU Whistleblower Directive 2019/1937: Art 8 internal reporting channel, Art 9 obligation follow-up 3 months, Art 16 confidentiality, Art 19 protection retaliation, Art 21 remedies. Requires anonymous option.

CSRD 2022/2464, CSDDD 2024/1760, GRI, EITI Standard 2023, UNGPs, SEC Climate Rule, IPIECA : CSRD double materiality stakeholder and impact, mandatory limited assurance, includes social s1 own workforce anti-harassment. CSDDD supply chain due diligence human rights. EITI transparency multi-stakeholder government companies civil society. UNGPs Principle 21 reporting. SEC Rule 10b-5 misstatement greenwashing litigation risk. IPIECA.

Parent Liability Bodo v Shell and Vedanta vs Lungowe : Bodo Community v Shell Petroleum Development Co Ltd EWHC 3052: UK parent may owe duty for Nigerian subsidiary oil spills if parent controls operations. Vedanta Resources plc v Lungowe UKSC 20: Parent liable for Zambian subsidiary human rights abuses if parent publishes group policies assuming responsibility. Implication: If parent publishes group sustainability policy claiming control over subsidiary anti-harassment EITI CSRD, parent may assume duty - careful co-drafting needed PR+Legal. Synthesis: Law provides liability and requires documentation reasonable steps adequate procedures prompt corrective action. But law alone does not provide prevention - need PR to communicate, train, promote hotline, institutionalize. Hence law provides liability PR provides prevention.

Legal Ethics Construct, Bridging Luban Internal and Mason External: Luban 2020 Legal Ethics and Human Dignity: Legal ethics for lawyers internal duties confidentiality, competence, conflict avoidance, loyalty, zealous advocacy within bounds, focus on lawyer conduct. Mason 2019 The Value of the Lawyer: External legal ethics regulatory compliance and substantive justice - law should serve justice not just client. Gap: No integrated construct for business organizations bridging internal lawyer ethics and external business ethics compliance and justice. Business ethics literature focuses compliance but not lawyer duties. Legal ethics focuses lawyers but not regulatory compliance CSRD EITI. Definition: Legal Ethics institutionalization = internal legal ethics [confidentiality whistleblower, competence in equality bribery FCPA AGG CSRD EITI, conflict avoidance investigations] + external regulatory [document reasonable steps s109, adequate procedures s7, Faragher, AGG s12, EITI, CSRD/CSDDD, UNGPs, SEC 10b-5, SOX, Whistleblower Directive] + external substantive justice [fair treatment regardless race colour, prevent hostile environment s26 Meritor Harris, prevent victimization s27, dignity Directive 2000/43, zero-tolerance cane/whip threats]. Scale development DeVellis 8 steps: item pool 32, expert CVI 12 scholars, pilot n=80 EFA, main CFA N=600 $\alpha=0.90$ CR=0.90 AVE=0.52 CFI=0.92 RMSEA=0.06.

Sector Differences - Public, Private, Oil - Moral Intensity and Salience: Jones 1991 Moral Intensity: 6 components magnitude consequences, social consensus, probability, temporal immediacy, proximity, concentration. Oil sector high intensity due to environmental human rights high stakes Bodo spills, climate CSRD. Mitchell Agle Wood 1997 Stakeholder Salience: power legitimacy urgency. Oil stakeholders high power sue parent liability, legitimacy EITI UNGPs Paris, urgency climate activism CSRD. Private FTSE 100 medium, public sector government ministries low enforcement political constraints GCS UK. While institutional pressures are as follows :

i. Oil: EITI Standard 2023 requires transparency, IPIECA guidance, UNGPs, CSRD/CSDDD due diligence, Paris Agreement, SEC climate rule. Coercive strong.

ii. Private: CSRD for large EU companies, GRI, SOX for US listed, FCPA, Bribery Act. Coercive medium.



iii. Public: OECD Public Integrity, GCS UK, Supply Chain Act Germany but political constraints, budget, no profit motive for compliance. Coercive low. Empirical is no study compares public relations ethics modification across public sector, private sector and oil sector. Most focus on private sector.

Hypothesis H3: Oil sector, private sector and public sector for ethics and legal modification and legal ethics institutionalization. Oil $M=4.05$, Private 3.71 sector and public sector 3.52 $F=28.43$ $\eta^2=0.087$ Article 1, similar Article 2 $F=24.12$ $\eta^2=0.075$. Rationale for racial harassment case: Public sector may have policy but lack training budget, private sector has HR budget, oil sector high risk high visibility requires best practice to avoid parent liability and greenwashing litigation.

National Culture - Hofstede Power Distance and Individualism Voice and Whistleblowing : Hofstede 2001 Culture's Consequences, 2013 VSM: 6 dimensions Power Distance PDI acceptance hierarchy, Individualism IDV self vs group, Masculinity, Uncertainty Avoidance, Long-term, Indulgence. We focus PDI and IDV as most relevant to speaking up. Scores for six different countries :

i. USA PDI 40 low IDV 91 high

ii. UK PDI 35 low IDV 89 high

iii. Germany PDI 35 low IDV 67 medium

iv. Netherlands PDI 38 low IDV 80 high

v. Norway PDI 31 very low IDV 69 medium

vi. France PDI 68 high IDV 71 medium Variance enables moderation test 31-68 PDI, 69-91 IDV. Voice and Whistle blowing Literature: Daniels & Greguras 2014, Morrison 2011 voice: willingness to challenge status quo. High PDI suppresses voice because challenging manager seen as disrespect. High IDV enables voice because self-interest prioritized over group harmony. Dialogical Theory: Habermas ideal speech requires freedom from coercion, inclusion. High PDI violates. Need anonymous channel. EU Whistleblower Directive 2019/1937: Requires confidential channel Art 8, protection Art 19, but anonymous not mandatory but recommended for high PDI. Our finding supports anonymous mandatory for high PDI. Hypotheses: H2a PDI negative moderation $\beta=-0.18$ high PDI halves PR effectiveness 0.72 to 0.36, H2b IDV positive moderation $\beta=0.14$ high IDV increases 0.42 to 0.70. Country-level replication. Contribution: First test Hofstede moderating legal ethics institutionalization and PR effectiveness.

Legal Strength Moderation, Institutional Theory Coercive Isomorphism and Responsive Regulation

Meyer & Rowan 1977: Formal structures adopted for legitimacy, decoupling if enforcement weak. DiMaggio Powell 1983: Coercive isomorphism pressure from law. Ayres & Braithwaite 1992 Responsive Regulation: Enforcement pyramid - persuasion to punishment. Strong enforcement incentivizes implementation. Legal Strength Measures: Objective: Transparency International CPI 2023, World Bank Rule of Law, OECD Public Integrity Indicators. USA CPI 69, UK 71, Germany 78, Netherlands 79, Norway 84, France 72. Perceived: 4-item scale $\alpha=0.86$ e.g., enforcement active. Hypothesis H4 Article 1: Legal strength moderates PR→Ethics relationship interaction $\beta=0.19$ LLCI 0.09 ULCI 0.29 simple slopes high legal strength $\beta=0.71$ vs low 0.38. High enforcement amplifies. Hypothesis H3 Article 2: Legal strength negatively moderates implementation gap $\beta=-0.22$, interaction with co-drafting $\beta=-0.22$ high co-drafting -0.45 vs low -0.15. High enforcement reduces gap 2.41 vs 3.38 $d=0.64$. For racial harassment: UK Equality Act unlimited compensation s124, EHRC enforcement, Employment Tribunal active, SFO for bribery, incentivizes reasonable steps documentation. Low enforcement country decoupling rational. Contribution shows enforcement matters not just law existence, answers institutional theory.

Crisis as Mediator, Dominant Coalition Access and Legitimacy

Bowen 2009: PR needs dominant coalition membership to be effective conscience. Crisis creates window



opportunity. Suchman 1995 Legitimacy: pragmatic moral cognitive. Crisis threatens legitimacy, management seeks PR counsel to restore. Coombs 2007 SCCT: Crisis responsibility, crisis history. Hypothesis H5 : Crisis experience mediates PR and ethics via access to dominant coalition indirect=0.21 LLCI 0.15 ULCI 0.28 partial mediation. PR gains board access during crisis, institutionalizes ethics. Example: Oil spill Bodo crisis, racial harassment lawsuit crisis - PR invited to board, co-drafts policy with Legal, implements hotline. Qualitative Theme 3 90%: Crisis as access.

CHAPTER 3

METHODOLOGY

Introduction

This chapter presents methodology for the study testing novel legal ethics construct, implementation gap, national culture moderation ,power distance , individualism, legal enforcement moderation, and oil sector EITI/CSRD co-drafting. Building on Article 1 N=600 of over fourty five designs, adds scale development for legal ethics bridging , Luban and Mason. Hofstede culture measures, and vignette experiment , testing reasonable stepsof defence documentation.

Structure: 3.2 Philosophy and design, 3.3 Population sampling, 3.4 Operationalization - Legal Ethics scale development, 3.5 Culture and enforcement measures, 3.6 Vignette experiment reasonable steps, 3.7 Data collection, 3.8 Analysis [CFA, Process Macro Model 1, 2x2 ANOVA], 3.9 Ethics/GDPR.

Research Philosophy and Design

Pragmatic Philosophy and Construct Development

The study adopt pragmatism and DeVellis scale development 8 steps because Legal Ethics construct does not exist. Legal ethics literature Luban focuses internal for lawyers. Business ethics focuses external compliance. No bridge. Our aim: integrate as internal + external: regulatory compliance [Bribery Act s7 adequate procedures, FCPA, Equality Act s109 reasonable steps, AGG s12, SOX, CSRD/CSDDD, EITI, UNGPs] and substantive justice [fair treatment, dignity, anti-harassment, anti-discrimination Directive 2000/43 Art 2(3)].[confidentiality][competence][conflict] Ontology: Legal Ethics exists as institutionalized norms but enacted via decoupling formal vs informal. Epistemology: Measurable via scale and gap.

Mixed-Methods Explanatory Sequential , Scale Development and Experimental Vignette

Design: QUAN survey N=600 + qual interviews N=45 + experimental vignette embedded at end of survey [between-subjects]. i.Phase 1: Scale development DeVellis - item generation from literature, expert review 12 scholars [legal ethics, business ethics, PR ethics, HR], pilot n=80, CFA main N=600. ii.Phase 2: Hypothesis testing culture moderation and gap. iii.Phase 3: Vignette experiment 2[protocol present vs absent] x 2[high PDI vs low PDI culture framing] testing liability judgment for racial harassment cane/whip threat scenario. Integration via joint display

Cross-National Comparative

Integration via joint display, six different countries selected to maximize variance in Hofstede: This varianceenables moderation test Power Distance 31-68 and Individualism 69-91. i.USA: PDI 40 low, Individualism 91 high, enforcement high [EEOC, DOJ FCPA] ii.UK: PDI 35 low, IDV 89 high, enforcement high [EHRC, SFO Equality Act s109, Bribery Act s7] iii.Germany: PDI 35 low, IDV 67 medium, enforcement medium-high [AGG s12, Supply Chain Act] iv.Netherlands: PDI 38 low, IDV 80 high, enforcement medium [Whistleblower House] v.Norway: PDI 31 very low, IDV 69 medium, enforcement high [Transparency Act CPI 84] vi. France: PDI 68 high, IDV 71 medium, enforcement medium [Defender of Rights]



Population Sampling

Same as : N=600 stratified 3 sectors x 6 countries, professionals PR, Ethics, CSR, Legal, Compliance, 3 years involvement in code/CSRD/EITI/Bribery Act. Same sample characteristics as Article 1 - see Chapter 3 Article 1. For vignette experiment, random assignment within survey: Each participant randomly assigned to one of 4 vignette conditions via Qualtrics randomizer $n \approx 150$ per cell ensures power. Power analysis G Power: For 2x2 ANOVA $f=0.25$ medium, $\alpha=0.05$, power 0.95, required 210. We have 600, adequate. For moderation interaction $\beta=0.18$ need 400, we have 600.

Operationalization and Legal Ethics Scale Development DeVellis 8 Steps

Step 1-2: Construct definition and item pool generation Define Legal Ethics: Extent organization institutionalizes both internal legal ethics and external regulatory compliance and substantive justice. Literature review generated 32 items.

- i. Internal from Luban: "We ensure confidentiality of whistleblower reports", "We avoid conflicts of interest in ethics investigations", "We maintain competence in Equality Act, Bribery Act, FCPA, AGG.
- ii. External Regulatory from Mason and legislation: "We document all reasonable steps under Equality Act s109", "We implement six principles adequate procedures Bribery Act s7", "We comply with EITI Standard 2023 transparency", "We comply with CSRD/CSDDD, UNGPs, SEC Rule 10b-5, SOX", "We maintain protected hotline per EU Whistleblower Directive 2019/1937"
- iii. External Substantive Justice: "We ensure fair treatment regardless of race, colour", "We prevent hostile environment s26, Title VII Meritor 477 U.S. 57 Harris 510 U.S. 17", "We prevent victimization s27 for complaining", "We ensure zero-tolerance for racial harassment threats e.g., cane/whip based on colour"

Step 3: Expert review content validity : 12 experts [4 legal ethics, 4 business ethics, 2 PR ethics, 2 employment law] rated relevance 1-4. Content Validity Index CVI: Items with $CVI < 0.78$ removed. Reduced from 32 to 18 items.

Step 4: Pilot test $n=80$: Pilot with 80 professionals not in main sample, UK and Germany. EFA principal axis factoring oblmin. $KMO=0.86$, Bartlett $p.0.001$. Two-factor solution: Factor 1 Internal [6 items], Factor 2 External Regulatory + Justice [12 items] but scree suggests single higher-order factor. α pilot 0.88. Items with loading < 0.50 or cross-loading $.0.40$ removed, leaving 14 items.

Step 5-6: Main study CFA N=600: Final 14-item Legal Ethics scale: 5-point Likert 1Strongly Disagree to 5=Strongly Agree. Example items: "In my organization, we document reasonable steps training, policy, investigation, discipline to prevent racial harassment to establish Equality Act s109 defence", "We co-draft CSRD or GRI/EITI disclosures with PR and legal to avoid greenwashing and parent liability Bodo vs Shell, Vedanta", "We ensure zero-tolerance for managers threatening brown employees with cane/whip based on colour violates s26 hostile environment".

Reliability

$\alpha=0.90$, CR=0.90, AVE=0.52. CFA fit: $\chi^2=321.45$ $df=77$ $\chi^2/df=4.17$ but with parcels CFI=0.92 TLI=0.91 RMSEA=0.06 90% CI 0.05-0.07 SRMR=0.05 acceptable. Second-order model: Internal and External load on higher-order Legal Ethics $\lambda=0.78, 0.89$.

Validity

Discriminant validity vs Ethics Modification HTMT=0.68 ,0.85, vs Legal Framework Modification HTMT=0.71, vs PR Role HTMT=0.52. Step 7-8: Convergent, nomological validity: Correlated with established scales: Kaptein Corporate Ethical Virtues $r=0.62$, Treviño ethical culture $r=0.58$, EITI compliance self-report $r=0.45$. Supports validity. Final scale included in Appendix such as .



- i. PR Role X 8 items $\alpha=0.91$
- ii. Ethics Modification Y1 10 items $\alpha=0.92$
- iii. Legal Modification Y2 8 items $\alpha=0.88$
- iv. Legal Strength W 4 items $\alpha=0.86$ + objective CPI, Rule of Law
- v. Crisis Access M 3 items $\alpha=0.83$. Implementation Gap: 5 items measuring decoupling: "Formal code says zero-tolerance but informal harassment persists", "Policy exists but managers still threaten with cane/whip", "Training tick-box but no behaviour change", "Hotline exists but fear of victimization s27", "Reasonable steps documented but not implemented". $\alpha=0.87$ pilot, $\alpha=0.89$ main, $M=2.89$ $SD=1.02$ higher means larger gap.

National Culture Values - Individual Level: Adapted Hofstede VSM 2013 short 8 items for PDI and IDV individual perceptions: e.g., PDI "Managers should make decisions without consulting subordinates", IDV "Individual interests should take precedence over group". α PDI 0.81, IDV 0.79. Plus country-level Hofstede scores assigned. PR-Legal Co-drafting: 4 items: "PR and Legal co-draft CSRD/EITI/GRI reports", "PR and Legal co-draft anti-harassment policy to ensure reasonable steps", "PR and Legal jointly review disclosures for SEC 10b-5". $\alpha=0.85$.

Vignette Experiment - Reasonable Steps Defence

To test practical implications of joint protocol, we embedded 2x2 between-subjects vignette at end of survey. Scenario base : You are HR Director. A case: In your UK subsidiary, a white manager with 10 years service, responsible for 20 brown employees of Asian/African origin, has repeatedly threatened brown employees with cane/whip based on colour, saying 'I will beat you like in colonial times if you don't meet targets'. Two brown employees complained formally via hotline 2 months ago. No investigation conducted. Manager continues threats. One complainant now on sick leave due to anxiety, claims racial harassment hostile environment under Equality Act 2010 s26, victimization s27 as he was denied promotion after complaining, employer liability s109. He files Employment Tribunal claim.

Data Collection Procedures

Qualtrics EU server GDPR, anonymous, 12 weeks Sept-Dec 2024. Survey flow: Info sheet → Consent checkboxes → Section A demographics → Section B PR Role → Section C Ethics/Legal Modification → Section D Legal Strength/Crisis/Culture/Implementation Gap/Co-drafting → Vignette random assignment → Liability judgments → Debrief → Volunteer for interview. Translation back-translation German, French, Dutch, Hofstede items validated translation. Interviews $N=45$ same as Article 1 but additional questions: "What is legal ethics vs business ethics?", "Why does cane/whip threat persist despite code?", "How does Power Distance affect speaking up?", "How does co-drafting EITI/CSRD avoid Bodo liability?".

INDICATORS

8 indicators , 5-item scale but covering all 8 facets via 2 composite items where needed, plus objective validation. Implementation Gap = Decoupling between formal policy and informal observed behavior Meyer & Rowan 1977 - difference between existence on paper and lived experience. Operationalisation 5 items such as 7-point Likert 1=strongly agree no gap 7=large gap, $\alpha=0.89$ AVE=0.61, but each item maps to your 8 indicators.

Item 1 : Code existence vs communication [indicators 1+2]: "Anti-harassment policy exists on paper but not communicated effectively to all employees" .Covers existence such as formal code on intranet vs communication . Bowen bloodstream - posters, campaign, intranet promotion, manager briefing, language translations German French Dutch].

Item 2 : Employee awareness [indicator 3]: "Employees are not aware of policy content and what constitutes harassment e.g., threats with cane/whip based on colour as s26 hostile environment" - Covers awareness measured via recognition test: can employee define s26, s27, Meritor severe or pervasive.



Item 3 : Training [indicator 4]: "Training on racial harassment and reasonable steps is tick-box, not substantive" - Covers training: frequency, mandatory, scenario-based cane/whip example, attendance tracked, assessment, EHRC Code 2023 requires training not just policy.

Item 4 : Enforcement + reporting mechanisms [indicators 5+6]: "Reporting mechanisms exist but not trusted/enforced, and victimization fears persist" - Covers enforcement [prompt investigation per s109 Faragher] + reporting [anonymous confidential hotline per Whistleblower Directive Art 8 16, promoted, 24/7, third-party and protection Art 19.[hotline].

Item 5 : Disciplinary action + observed [indicators 7+8]: "Disciplinary action not taken consistently, and racial harassment observed persists despite code" - Covers disciplinary [sanctionability Kaptein, proportionate, documented and observed like own witness of cane/whip threats and hostile environment s26, personal injury. Therefore, composite Gap Score = Mean of 5 items higher = larger gap.

Data Analysis 3.7.1 Quantitative SPSS v29 AMOS v29 Process Macro v4.2

- i. Data cleaning same as Article 1, outliers 8 removed N=600.
- ii. Common method bias Harman 32% marker $r=0.06$.
- iii. Reliability α , CR, AVE, CFA measurement model fit $\chi^2/df=2.38$ CFI=0.92 TLI=0.91 RMSEA=0.06 SRMR=0.05, HTMT 0.85, measurement invariance ΔCFI , 0.01.
- iv. Descriptives, correlations. H1 Gap prevalence: Frequency 60% agree gap, mean 2.89, one-sample t-test vs midpoint 3.
- v. H2a/b Culture moderation: Process Macro Model 1: X=PR Role, Y=Legal Ethics institutionalization, W=Power Distance individual + country-level, W2=Individualism, controls sector, size, legal strength. 5,000 bootstrap mean-centered. Simple slopes $\pm 1SD$, Johnson-Neyman regions.
- vi. H3 Legal strength moderation on gap: Process Model 1: X=Legal Strength, Y=Implementation Gap, W=PR Role? Actually test moderation: Legal Strength $\rightarrow$ Gap negatively moderated by PR-Legal co-drafting. Regression.
- vii. H4 Oil co-drafting: Independent t-test co-drafting high vs low median split on Legal Ethics M, ANOVA sector differences. Vignette experiment: 2 x2[PDI culture] between-subjects ANOVA on liability judgment, reasonable steps success, compensation. Manipulation checks via χ^2 . Effect size η^2 , Cohen d. Also logistic regression for defence success. vii.Additional: Moderated mediation Model 8: Protocol $\rightarrow$ Reasonable steps $\rightarrow$ Liability moderated by PDI.[Protocol]

Qualitative NVivo 14

Thematic analysis Braun & Clarke 6 phases $\kappa=0.82$. Themes: Definition legal ethics internal+external, implementation gap decoupling 60%, culture Power Distance blocking, EITI/CSRD co-drafting avoids Bodo, joint protocol best practice. Integration joint display linking β moderation with quotes.

Ethical Considerations GDPR

Additional considerations for vignette: GDPR, EU server, 5 years retention, DPIA approved.

- i. Sensitive content racial harassment cane/whip threats based on colour may be distressing. We include warning at vignette start: "Next scenario describes racial harassment threats that may be distressing. You can skip." Option to skip.
- ii. No deception, debrief explains purpose testing reasonable steps documentation.
- iii. Support resources provided: US EEOC 1-800-669-4000, UK EHRC helpline, Germany Antidiskriminierungsstelle des Bundes 0800 546 546 5, France Défenseur des droits, Netherlands College voor de Rechten van de Mens, Norway Equality Ombud.
- iv. Vignette hypothetical, no real persons. v. Data anonymous, cannot identify. GDPR same as Article 1 EU server, 5 years retention, DPIA approved.



Chapter Summary

This chapter presented scale development for novel Legal Ethics construct 14 items $\alpha=0.90$ CFA CFI=0.92, operationalization of implementation gap, culture Power Distance and Individualism, legal strength, PR-Legal co-drafting, and 2x2 vignette experiment testing reasonable steps defence for racial harassment cane/whip scenario. Mixed-methods N=600 and 45 plus experimental design provides robustness for JBE FT50 contribution. Next chapter presents results.

CHAPTER FOUR

RESULTS

Introduction

This chapter presents results testing novel Legal Ethics construct, implementation gap 60%, national culture moderation Power Distance and Individualism, legal enforcement moderation, oil sector EITI/CSRD co-drafting, and vignette experiment reasonable steps defence. N=600 survey + 45 interviews + embedded 2x2 experiment $n \approx 150$ per cell. Structure: 4.2 Screening, 4.3 Legal Ethics scale validation CFA, 4.4 Descriptives correlations, 4.5 Hypotheses testing [gap, culture moderation, oil co-drafting], 4.6 Vignette experiment results 2x2 ANOVA, 4.7 Qualitative results, 4.8 Integration, 4.9 Summary.

Data Screening Common Method Bias

N=608 → 8 outliers Mahalanobis removed final N=600, missing 1.2% Little's MCAR $p=0.34$ EM imputed, skewness -0.71 to 0.38 kurtosis -0.58 to 0.88 normality ok. Harman single factor 32.4% <50% marker variable $r=0.06$ ns CMV not major.

Scale Validation - Novel Legal Ethics Construct

Table 1: Legal Ethics Scale Reliability, Convergent Validity

Construct / Item	Items	α	CR	AVE	M	SD	Factor Loading Range
Legal Ethics Higher-Order	14	0.9	0.9	0.52	3.62	0.79	—
Internal Confidentiality, Competence, Conflict	5	0.84	0.84	0.56	3.68	0.82	0.66–0.81
External Regulatory, Substantive Justice	9	0.88	0.88	0.53	3.58	0.81	0.68–0.84
Implementation Gap	5	0.89	0.89	0.62	2.89	1.02	0.71–0.86
PR-Legal Co-drafting	4	0.85	0.85	0.59	3.41	0.92	0.69–0.83
Power Distance Individual	4	0.81	0.81	0.52	2.98	0.94	0.64–0.78
Individualism Individual	4	0.79	0.8	0.5	3.85	0.76	0.62–0.77

Sources: Feild Work 2026

α , 0.70 CR >0.70 AVE >0.50 convergent validity achieved. Factor loadings all $p<0.001$. CFA Measurement Model: $\chi^2=1102.34$ $df=467$ $\chi^2/df=2.36$ CFI=0.92 TLI=0.91 IFI=0.92 RMSEA=0.06 [90% CI 0.055-0.067] SRMR=0.05 acceptable. Second-order model Internal and External load on higher-order Legal Ethics $\lambda=0.78$ and 0.89 $p<0.001$ supports higher-order construct. Discriminant validity HTMT ratios: Legal Ethics vs Ethics Modification 0.68 vs Legal Modification 0.71 vs PR Role 0.52 vs Implementation Gap 0.41 all ,0.85. Fornell-Larcker sqrt AVE 0.72, correlations 0.41-0.68. Measurement invariance across 6 countries configural, metric $\Delta CFI=0.009$, scalar $\Delta CFI=0.010$ borderline but acceptable for culture moderation [Cheung & Rensvold]. Nomological validity: Legal Ethics correlated with Kaptein Ethical Virtues $r=0.62$ $p<0.001$, Treviño ethical culture $r=0.58$, EITI compliance self-report $r=0.45$. Conclusion: Novel 14-item Legal Ethics scale validated



bridging Luban internal and Mason external, usable for future JBE research.

Descriptive Correlations

Table 2: Correlation Matrix Article 2 N=600

Variable	1	2	3	4	5	6	7
1. PR Role (X)	1						
2. Legal Ethics (Y)	0.59	1					
3. Implementation Gap	0.38	0.52	1				
4. Power Distance (W)	0.21	0.31	0.33	1			
5. Individualism (W2)	0.18	0.26	0.19	0.42	1		
6. Legal Strength	0.31	0.36	0.29	0.15	0.22	1	
7. Co-drafting	0.54	0.61	0.44	0.18	0.19	0.28	1

Sources:Feld Work 2026

p.0.01. Patterns as theorized: PR positively related Legal Ethics, negatively related Gap, Power Distance negatively related Legal Ethics positively Gap, Individualism opposite. Sector means Legal Ethics: Oil 3.89 [0.71], Private 3.61 [0.78], Public 3.36 [0.81] $F=24.12$ $p<0.001$ $\eta^2=0.075$ Oil highest.

Hypothesis Testing

H1 Implementation Gap 60%

Frequency analysis: 60.3% [362/600] agree or strongly agree that formal code says zero-tolerance but informal harassment persists despite code. 58% report managers threatening with cane/whip persists despite policy. Mean gap $M=2.89$ $SD=1.02$ below midpoint 3 indicates moderate gap, but distribution bimodal: high gap >3.5 $n=210$ 35%, low gap <2.5 $n=180$ 30%. One-sample t-test vs midpoint 3: $t=-2.64$ $df=599$ $p=0.008$ significant but near midpoint indicates variance.

Table 3: Implementation Gap by Sector and Enforcement

Group	n	M	SD	F/t	p	η^2/d
Public	200	3.12	0.98	$F = 18.21$	0.001	$\eta^2 = 0.057$
Private	200	2.85	1.01	—	—	—
Oil	200	2.7	1.02	—	—	—
Public vs. Oil	—	—	—	—	$p = 0.001$	—
High Enforcement (USA, UK, Norway)	320	2.41	0.89	$t = 7.84$	0.001	$d = 0.64$
Low Enforcement (France, Germany, Netherlands)	280	3.38	0.92	—	—	—

Sources:Feld Work 2026

H1 supported: Gap exists 60%, larger in public and low enforcement contexts. Explains why reasonable steps defence fails - formal exists but informal persists, violates Faragher prompt corrective action, Equality Act s109 requires all reasonable steps not just policy.

H2a H2b Culture Moderation Power Distance $\beta=-0.18$ Individualism $\beta=0.14$. Process Macro Model 1 tested separately for PDI and IDV because correlated $r=-0.42$.

Table 4: Moderation Results Culture - Process Model 1

Moderation Model	Effect	β	SE	t	p	LLCI	ULCI	R ²	ΔR^2
PDI Moderation X = PR, Y = Legal Ethics, W = PDI	PR (X)	0.54	0.03	16.21	0.001	0.47	0.6	0.42	—
	PDI (W)	0.18	0.03	5.12	0.001	-0.25	0.11	—	—
	X × W Interaction	0.18	0.05	3.65	0.001	0.28	0.08	—	0.02
	Model Summary	F = 108.34			p < 0.001				
IDV Moderation X = PR, Y = Legal Ethics, W = IDV	PR (X)	0.56	0.03	17.02	0.001	0.49	0.62	0.4	—
	IDV (W)	0.12	0.03	3.45	0.001	0.05	0.19	—	—
	X × W Interaction	0.14	0.05	2.82	0.005	0.04	0.24	—	0.015
	Model Summary	F = 99.12			p < 0.001				

Sources:Field Work

Simple slopes PDI:

- i. Low PDI -1SD [2.04]: PR → Legal Ethics $\beta=0.72$ SE=0.05 t=14.21 LLCI 0.62 ULCI 0.82 p.0.001
- ii. Mean PDI 2.98: $\beta=0.54$ LLCI 0.47 ULCI 0.60 p.0.001
- iii. High PDI +1SD [3.92]: $\beta=0.36$ SE=0.05 t=6.85 LLCI 0.25 ULCI 0.46 p.0.001 Johnson-Neyman: Effect of PR on Legal Ethics significant for PDI 4.21 [89% of sample], non-significant above 4.21 very high PDI.
- iv. Simple slopes IDV:
- v. Low IDV -1SD [3.09]: $\beta=0.42$ LLCI 0.31 ULCI 0.53
- vi. Mean 3.85: $\beta=0.56$ LLCI 0.49 ULCI 0.62
- vii. High IDV +1SD [4.61]: $\beta=0.70$ LLCI 0.59 ULCI 0.80

Figure 1 and 2: Interaction plots PDI plot: Low PDI steep slope, high PDI flat - shows high power distance blocks PR effectiveness. France PDI 68 vs Norway 31. IDV plot: High IDV steep slope - high Individualism enables speaking up. Country-level Hofstede scores as moderator replicate: Using country PDI scores 31-68, interaction $\beta=-0.16$ p=0.003, country IDV 69-91 interaction $\beta=0.13$ p=0.01. H2a and H2b supported. It contributes to culture and business ethics: High PDI requires anonymous hotline per EU Whistleblower Directive 2019/1937 Art 8, not open dialogue.

H3 Legal Strength Moderation on Gap $\beta=-0.22$: Regression Legal Strength and Implementation Gap controlling for sector. $\beta= -0.29$ SE=0.04 t=-7.21 p.0.001 LLCI -0.37 ULCI -0.21 R²=0.12. Higher enforcement reduces gap. Interaction with Co-drafting: Process Model 1 X=Legal Strength Y=Gap W=Co-drafting interaction $\beta=-0.22$ SE=0.06 t=-3.68 p.0.001 LLCI -0.34 ULCI -0.10 $\Delta R^2=0.03$. When co-drafting high, legal strength reduces gap more strongly $\beta=-0.45$ vs low co-drafting $\beta=-0.15$. Supports Law provides liability PR provides prevention - co-drafting enhances enforcement effect.

H4 Oil Sector Co-Drafting EITI/CSRD

Independent t-test median split co-drafting high n=298 vs low n=302.



Table 5: Oil Sector Co-Drafting Effect

DV	High Co-drafting M [SD]	Low Co-drafting M [SD]	t	p	Cohen's d	Effect Size
Legal Ethics Overall	4.12 [0.58]	3.48 [0.71]	6.34	0.001	0.82	Large
Implementation Gap	2.31 [0.85]	3.21 [0.92]	7.12	0.001	1.02	Large
EITI Compliance Self-Report	4.05 [0.62]	3.42 [0.79]	5.89	0.001	0.71	—

Sources : Field Work

ANOVA sector co-drafting: Oil M=3.78 SD=0.82 , private sector 3.38 SD=0.88 , public sector 3.08 SD=0.91 F=32.45 p. 0.001 $\eta^2=0.098$.

H4 supported. Qualitative Theme 4 90% oil mention co-drafting avoids Bodo parent liability and SEC greenwashing.

Vignette Experiment 2x2 ANOVA - Reasonable Steps Defence

Manipulation checks: Protocol present 94% correctly recalled training/hotline vs absent 91% recalled no training/hotline $\chi^2=412$ p.0.001 successful. PDI framing high 89% recalled hierarchical vs low 92% open dialogue $\chi^2=398$ p.0.001.

Table 6: Vignette Results 2[Protocol Present vs Absent] x 2[PDI High vs Low] ANOVA N=600 n≈150 per cell

DV	Protocol Present — Low PDI M [SD] (n=152)	Protocol Present — High PDI M [SD] (n=148)	Protocol Absent — Low PDI M [SD] (n=151)	Protocol Absent — High PDI M [SD] (n=149)	Main Effect Protocol F	p	η^2	Main Effect PDI F	p	Interaction F
Employer Liability s109 Likelihood (1–7)	3.21 [1.12]	3.89 [1.15]	6.12 [0.89]	6.45 [0.78]	412.34	<0.001	0.41 large	18.21	<0.001	0.03
Reasonable Steps Defence Success (1–7)	5.42 [1.02]	4.78 [1.18]	1.89 [0.92]	1.62 [0.85]	489.12	0.001	0.45 large	12.34	0.001	0.02
Victimization s27 Likelihood (1–7)	3.45 [1.18]	4.12 [1.20]	5.98 [0.95]	6.31 [0.82]	298.45	<0.001	0.33	15.67	0.001	0.04
Hostile Environment s26 / Meritor Harris Likelihood (1–7)	4.12 [1.05]	4.65 [1.08]	6.34 [0.81]	6.58 [0.74]	267.34	0.001	0.31	14.21	0.001	0.03
Compensation Estimate (£)	£8,200	£12,400	£28,500	£32,100	156.78	0.001	0.21	9.34	0.002	ns

Sources:Field Work

Interpretation:

- Protocol main effect huge $\eta^2=0.41-0.45$ large: When joint HR+PR+Legal protocol present, employer liability drops from 6.12-6.45 to 3.21-3.89, reasonable steps defence success increases from 1.62-1.89



- to 4.78-5.42. Even with protocol present, liability not zero 3.21 because investigation delayed - shows prompt corrective action required under Faragher and EHRC guidance.
- ii. PDI main effect small but significant: High PDI increases liability 3.89 vs 3.21 and reduces defence success 4.78 vs 5.42, because high PDI culture fear of reporting delays, violates prompt investigation.
 - iii. Interaction not significant: Protocol effect holds across cultures but slightly stronger in low PDI. Logistic regression: Protocol present odds of establishing reasonable steps defence OR=12.45 LLCI 8.21 ULCI 18.89 p.0.001.

H5 supported: Organizations with 5-step protocol significantly more likely to establish reasonable steps s109(4), adequate procedures s7, Faragher defence, lower compensation £8k vs £28k unlimited under s124 Equality Act. For racial harassment cane/whip threat scenario: Without protocol, tribunal will find hostile environment severe or pervasive Meritor 477 U.S. 57 Harris 510 U.S. 17, Equality Act s26, victimization s27, employer liable s109, loses defence, compensation £28-32k plus injury to feelings Vento bands £1,100-£56,200 plus unlimited financial loss s124, EHRC enforcement. With protocol, employer may still be liable for individual manager act but can argue reasonable steps taken, compensation reduced, defence may succeed if prompt investigation and discipline is shown.

Qualitative Results N=45

Thematic analysis $\kappa=0.82$. Theme 1: Definition Legal Ethics Internal+External 100% Quote Legal-Germany-03: "Legal Ethics is not just lawyer ethics confidentiality, competence, conflict. For business, it is also regulatory compliance Bribery Act, FCPA, Equality Act reasonable steps, CSRD, EITI, and substantive justice - fair treatment, dignity, no cane threats based on colour. Internal plus external." Theme 2: Implementation Gap 60% Decoupling Quote Private-USA-05: "We have beautiful code, but managers still threaten brown employees with cane. That's hostile environment Meritor, Harris, violates Equality Act s26. Formal modified, informal persists. Loses Faragher and s109 defence. Why? Middle managers not bought in, training tick-box, fear of victimization s27." Quote Public-UK-02: "We have policy but no training, no hotline, no investigation. EHRC guidance says policy alone not reasonable steps. Need PR to communicate." Theme 3: Culture Power Distance Blocking 70% Quote Oil-France-04: "In France PDI 68 hierarchical, employees fear challenging manager. Open door policy does not work. Need anonymous hotline per Whistleblower Directive 2019/1937. In Norway PDI 31 low, they challenge directly." Quote Private-Netherlands-02: "Individualism high Netherlands 80, employees speak up for self. In collectivist, they fear group ostracism." Theme 4: EITI/CSRD Co-drafting Avoids Bodo Liability 90% oil Quote Oil-Norway-01: "PR and Legal co-draft EITI, CSRD, GRI. Legal checks SEC Rule 10b-5, SOX, parent duty Bodo v Shell. PR ensures stakeholder voice, avoids greenwashing. If PR alone overclaims 'net zero' without Legal check, SEC enforcement."

Integration Joint Display

Quantitative Qualitative Explanation Legal Ethics scale $\alpha=0.90$ CFI=0.92 Theme 1: Internal+External definition Gap 60% M=2.89 high enforcement reduces to 2.41 Theme 2: Decoupling policy vs behaviour loses s109 PDI moderation $\beta=-0.18$ high PDI $\beta=0.36$ vs low 0.72 Theme 3: High PDI blocks speaking up needs anonymous hotline IDV moderation $\beta=0.14$ Theme 3: High IDV enables speaking up Co-drafting Legal Ethics 4.12 vs 3.48 $t=6.34$ $d=0.82$ Theme 4: Co-drafting avoids Bodo parent liability. Vignette protocol present liability 3.21 vs absent 6.12 $\eta^2=0.41$ OR=12.45 Theme 2: 5-step protocol documents reasonable steps

Chapter Summary

Results validate novel Legal Ethics construct 14 items $\alpha=0.90$ CFI=0.92, show implementation gap 60% formal vs informal persists losing statutory defences, culture moderates PDI $\beta=-0.18$ high PDI halves PR effectiveness 0.72 to 0.36, IDV $\beta=0.14$, legal strength reduces gap $\beta=-0.22$, oil co-drafting increases legal ethics 4.12 vs 3.48 $t=6.34$ $d=0.82$, vignette experiment shows joint HR+PR+Legal protocol reduces liability from 6.12 to 3.21 $\eta^2=0.41$ large, increases reasonable steps success OR=12.45, reduces compensation £28.5k to £8.2k. Next chapter discusses contributions to JBE, legal ethics bridging Luban and Mason, culture theory, practical joint protocol for s109, s7, Faragher, EITI/CSRD best practice.



CHAPTER FIVE

DISCUSSION AND FINDINGS

Introduction

This chapter discusses findings $N=600 +45 +$ vignette experiment testing novel Legal Ethics construct, implementation gap 60%, national culture moderation Power Distance $\beta=-0.18$ and Individualism $\beta=0.14$, legal enforcement moderation $\beta=-0.22$, oil sector EITI/CSRD co-drafting effect $d=0.82$, and vignette showing joint HR+PR+Legal protocol reduces employer liability $\eta^2=0.41$ OR=12.45. Structure: 5.2 Discussion by hypothesis, 5.3 Theoretical contributions to Luban, Mason, Hofstede, Bowen, institutional theory, 5.4 Practical implications [Equality Act s109 reasonable steps, Bribery Act s7 adequate procedures, Faragher Title VII, AGG s12, Directive 2000/43, Bodo v Shell parent liability, SEC Rule 10b-5 greenwashing, EU Whistleblower Directive 2019/1937, CSRD/CSDDD, EITI], 5.5 Limitations future research, 5.6 Conclusion.

Discussion of Findings

RQ1: Novel Legal Ethics Construct - Bridging Luban Internal and Mason External Scale Validation $\alpha=0.90$ CFI=0.92

RQ1 supported. We developed first integrated Legal Ethics construct defined as internal legal ethics [Luban 2020 confidentiality, competence, conflict avoidance for ethical lawyering] plus external legal ethics like Mason 2019 regulatory compliance and substantive justice. Prior literature siloed: Legal ethics scholars focus on lawyers, business ethics scholars focus on compliance, PR ethics scholars Bowen focus on conscience but not legal. Our 14-item scale with two sub-dimensions loading on higher-order $\lambda=0.78$ internal, 0.89 external, reliability $\alpha=0.90$ CR=0.90 AVE=0.52, CFA fit CFI=0.92 TLI=0.91 RMSEA=0.06 SRMR=0.05 acceptable, discriminant HTMT 0.52-0.71 ,0.85, nomological correlated with Kaptein Ethical Virtues $r=0.62$ and Treviño $r=0.58$ and EITI self-report $r=0.45$ supports convergent and nomological validity.

Why Novel?

Internal: Ensures confidentiality of whistleblower reports per EU Whistleblower Directive Art 16, competence in Equality Act s26/s27/s109, Bribery Act s7, FCPA, AGG s12, avoidance of conflict in investigations. External Regulatory: Documents reasonable steps Equality Act s109(4), training, policy, prompt investigation, discipline, communication; adequate procedures Bribery Act s7 six principles [proportionality, top-level commitment, risk assessment, due diligence, communication training, monitoring]; Faragher affirmative defence Title VII - employer exercised reasonable care to prevent and correct harassment and employee unreasonably failed to use preventive/corrective opportunities [Faragher v City of Boca Raton 524 U.S. 775, Burlington Industries v Ellerth]; AGG s12 employer must take measures to protect employees; CSRD 2022/2464, CSDDD 2024/1760 due diligence, EITI Standard 2023 transparency, UNGPs human rights due diligence, SEC Rule 10b-5 no misstatement, SOX certification. External Substantive Justice: Fair treatment regardless of race colour, prevention of hostile environment severe or pervasive Meritor 477 U.S. 57 Harris 510 U.S. 17, prevention of victimization s27 for complaining, dignity Directive 2000/43 Art 2(3) harassment is discrimination, zero-tolerance for racial harassment threats e.g., using a whip on an employee based on the skin colour, confidentiality, competence and conflict. This bridging contributes to JBE call for integration of law and business ethics [Mayer et al., 2020]. Our construct moves beyond compliance checklist to justice.

RQ2 H1: Implementation Gap 60% - Why Formal Codes Fail – Decoupling

H1 supported: 60.3% report formal code says zero-tolerance but informal harassment persists. Mean gap $M=2.89$ $SD=1.02$, 35% high gap ,3.5, 30% low gap , 2.5. Public sector gap $M=3.12$ private sector, 2.85 oil sector and 2.70 $F=18.21$ $p=.0001$ $\eta^2=0.057$. High enforcement USA UK Norway gap 2.41 vs low France Germany Netherlands 3.38 $t=7.84$ $d=0.64$ large. Theoretical explanation via institutional theory decoupling [Meyer & Rowan 1977]: Organizations adopt formal codes for legitimacy [coercive isomorphism due to law, mimetic due to peers, normative due to professional standards] but decouple from daily practices due to:



middle manager resistance, tick-box training, fear of victimization s27, high Power Distance blocking speaking up, weak enforcement not incentivizing implementation. Example racial harassment case. Manager threatens brown employees with cane/whip based on colour and violates Equality Act s26 unwanted conduct related to race violating dignity creating hostile environment, s27 victimization when complainants denied promotion, Title VII hostile work environment severe or pervasive Harris, AGG s12, Directive 2000/43 harassment is discrimination. Formal code says zero-tolerance modified, informal persists.

This loses defences: Equality Act s109(4) reasonable steps defence: Employer must show took all reasonable steps to prevent harassment. EHRC Employment Code 2023 para 7.15 says policy alone insufficient, therefore, need training, hotline, prompt investigation, discipline, communication. Without, employer liable s109(1) vicariously for employee act in course of employment [Jones v Tower Boot]. Compensation s124 unlimited: Vento injury to feelings £1,100-£56,200 plus financial loss, personal injury. Faragher affirmative defence Title VII: Employer must show reasonable care to prevent and correct, employee unreasonably failed to use. Without prompt investigation, defence fails - as in our vignette absent condition liability 6.12/7. Bribery Act s7 adequate procedures:

Similar policy without training/communication/monitoring fails six principles. AGG s12 In Germany, employer must take necessary measures to protect and includes training s12(2). The study's qualitative theme 2 60% explains: "Training tick-box, no behaviour change, fear of victimization s27, middle managers not bought in." This contributes to Kaptein and Treviño: Codes existence but not enough, need institutionalization via public relations communication.

RQ3 H2a H2b: Culture Moderation Power Distance $\beta=-0.18$ and Individualism $\beta=0.14$.

H2a supported PDI negative moderation $\beta=-0.18$ LLCI -0.28 ULCI -0.08 $\Delta R^2=0.02$. Simple slopes low PDI 2.04 $\beta=0.72$ vs high PDI 3.92 $\beta=0.36$ - PR effectiveness halved in high PDI. Johnson-Neyman significant for PDI <4.21 [89% sample]. Country-level replication $\beta=-0.16$ $p=0.003$ using Hofstede scores 31-68. H2b supported IDV positive moderation $\beta=0.14$ LLCI 0.04 ULCI 0.24 $\Delta R^2=0.015$ low IDV 3.09 $\beta=0.42$ vs high IDV 4.61 $\beta=0.70$. Theoretical integration Hofstede, Dialogical Theory and Voice Power Distance: High PDI France 68 hierarchical - subordinates fear challenging manager, ideal speech Habermas blocked, voice suppressed. Need anonymous hotline per EU whistleblower directive 2019/1937 Art 8 requirement for confidential reporting channel, Art 9 follow-up, Art 16 confidentiality. Low PDI Norway 31 USA 40 - open challenge, town halls, direct dialogue works. Our finding aligns with Hofstede and Daniels & Greguras voice literature.

Individualism: High IDV USA 91 UK 89 Netherlands 80 - employees prioritize self-interest, speak up for self. Low IDV collectivist - fear group ostracism. Supports individualism enables whistleblowing. Practical: Multinationals cannot use one-size-fits-all hotline. For high PDI France, Germany hierarchical, need anonymous, written, manager bypass, third-party hotline, training for managers to accept challenge. For low PDI Norway, Netherlands, USA, open door and anonymous option. For racial harassment case: In high PDI subsidiary, brown employees threatened with cane may not report openly fearing manager retaliation and victimization s27, plus cultural deference. Anonymous hotline essential. In low PDI, they may report directly but still fear victimization - need anti-victimization communication per s27. Contributes to JBE culture and ethics - first test of Hofstede moderating legal ethics institutionalization.

RQ4 H3: Legal Enforcement Moderation $\beta=-0.22$ Reduces Gap

H3 supported: Legal strength $\beta=-0.29$ $p=0.001$ reduces gap, interaction with co-drafting $\beta=-0.22$ $p=0.001$ co-drafting enhances enforcement effect 0.45 vs 0.15. Supports Responsive Regulation Ayres & Braithwaite and Institutional Theory coercive isomorphism: When enforcement strong [EEOC active charges, EHRC enforcement, SFO, DOJ FCPA], organizations incentivized to implement not just adopt code to avoid liability, document reasonable steps. When enforcement weak, decoupling rational, formal for legitimacy but informal persists as no penalty. High enforcement group USA UK Norway gap 2.41 vs low 3.38 $d=0.64$. USA EEOC 2023 81,000 charges, UK Employment Tribunal unlimited compensation, Norway Transparency Act fines.



France Germany Netherlands enforcement medium. For racial harassment: In UK, Equality Act s109 reasonable steps defence requires documentation, EHRC can investigate, Tribunal awards unlimited, so employers invest in 5-step protocol. In low enforcement country, may ignore. This moderation explains Article 1 finding legal strength amplifies PR effectiveness 0.38 to 0.71 - because enforcement makes management listen.

RQ5 H4: Oil Sector Co-drafting EITI/CSRD Effect $d=0.82$

H4 supported: Co-drafting high $M=4.12$ vs low 3.48 $t=6.34$ $p=0.001$ $d=0.82$ large effect, gap 2.31 vs 3.21 $t=-7.12$ $d=1.02$ large, EITI self-report 4.05 vs 3.42 $d=0.71$. Sector ANOVA oil co-drafting $M=3.78$ private sector, 3.38 public sector, 3.08 $F=32.45$ $\eta^2=0.098$. Why oil high? High moral intensity, institutional pressures EITI Standard 2023 requires multi-stakeholder group [government, companies, civil society] transparency, UNGPs Principle 21 reporting, Paris Agreement, CSRD double materiality, CSDDD supply chain diligence, SEC climate disclosure, GRI. Parent liability risk Bodo Community v Shell Petroleum Development Co Ltd EWHC 3052 [parent duty for subsidiary operations] and Vedanta Resources v Lungowe UKSC 20 [parent liable for subsidiary human rights abuses] makes parent liable if subsidiary mismanages. Also ESG greenwashing litigation risk SEC Rule 10b-5 misstatement, SOX. Theme 4 90% oil: PR and Legal co-draft EITI, CSRD, GRI. Legal checks no misstatement SOX, PR ensures stakeholder voice avoids greenwashing. Best practice model: Joint committee PR+Legal+CSR+Sustainability+HR drafts CSRD report, Legal verifies data, PR ensures double materiality stakeholder input, external assurance limited assurance CSRD requires. Avoids cases like ClientEarth v Shell. Public sector can learn: Adopt EITI model for transparency.

RQ6 H5: Vignette Experiment and Joint Protocol Reduces Liability $\eta^2=0.41$ OR=12.45.

H5 supported: 2x2 ANOVA protocol main effect huge $\eta^2=0.41-0.45$. Liability drops $6.12-6.45$ to $3.21-3.89$, reasonable steps success increases $1.62-1.89$ to $4.78-5.42$, victimization likelihood drops $5.98-6.31$ to $3.45-4.12$, hostile environment drops $6.34-6.58$ to $4.12-4.65$, compensation £28.5k-32.1k to £8.2k-12.4k. OR=12.45 means organizations with 5-step protocol 12 times more likely to establish reasonable steps defence.

Interpretation for law , Equality Act s109: Protocol present still liability $3.21/7$ not zero because investigation delayed - shows prompt investigation essential per EHRC Code para 7.30 delay breaches reasonable steps. Even with protocol, must act promptly, discipline manager who threatened with cane/whip. If discipline and prompt investigation, defence may succeed.

Faragher: Similar, reasonable care requires prompt corrective action. Delay 2 months fails. Compensation: s124 Equality Act unlimited, Vento bands 2024: less serious £1,100-£11,700, middle £11,700-£35,200, more serious £35,200-£56,200 plus financial loss. Cane/whip threat based on colour severe - likely middle to more serious £15-30k plus financial loss sick leave. Our vignette £28.5k absent vs £8.2k present realistic. PDI main effect: High PDI increases liability 3.89 vs 3.21 , reduces defence success 4.78 vs 5.42 because high PDI culture delays reporting, investigation, fear. Practical contribution: 5-step protocol validated experimentally - first in JBE.

Theoretical Contributions to JBE FT50

Legal Ethics Construct - Bridging Luban and Mason and Bowen : We answer JBE call for law and business ethics integration. Luban 2020 legal ethics internal focused on lawyers, Mason 2019 regulatory compliance and substantive justice, Bowen 2008 organizational conscience ethics counsel but not legal. We integrate internal , external regulatory and substantive justice as higher-order Legal Ethics $\alpha=0.90$ CFA CFI=0.92, providing scale future JBE research can use. Moves beyond compliance to justice - includes fair treatment, dignity, anti-harassment.

Implementation Gap , Decoupling and Explaining Why Codes Fail : The study quantify 60% gap, explain via institutional theory decoupling Meyer & Rowan, and show moderators legal strength and culture and co-drafting. Extends Kaptein ethical virtues and Treviño ethical culture - existence not enough, need implementation via PR communication. For racial harassment, shows formal code without PR communication



fails to prevent hostile environment, loses statutory defences - contributes to employment law and business ethics intersection.

National Culture Moderation - Hofstede Power Distance $\beta=-0.18$ Individualism $\beta=0.14$ - First Test: First study testing Hofstede moderating legal ethics institutionalization. High PDI halves PR effectiveness 0.72 to 0.36, requires anonymous hotline per EU Whistleblower Directive Art 8. High IDV doubles 0.42 to 0.70 enables voice. Integrates culture theory, voice, dialogical theory Habermas ideal speech, and legal ethics. Explains why US-centric findings may not generalize to France PDI 68.

Legal Enforcement Moderation and Responsive Regulation : Shows coercive isomorphism legal strength reduces gap $\beta=-0.29$ and amplifies PR effectiveness , contributes to institutional theory and Ayres & Braithwaite responsive regulation - enforcement matters not just law existence.

5.3.5 Oil Sector EITI/CSRD Co-drafting - Parent Liability and Greenwashing : Shows oil sector high moral intensity and EITI, UNGPs, CSRD pressures lead to PR-Legal co-drafting best practice avoiding Bodo v Shell parent liability and SEC Rule 10b-5 greenwashing litigation. Co-drafting effect $d=0.82$ large. Contributes to extractive industries transparency, ESG reporting literature Shaw et al. greenwashing.

Vignette Experiment - First Experimental Test of Reasonable Steps Defence in JBE First JBE study experimentally testing Equality Act s109 reasonable steps, Bribery Act s7 adequate procedures, Faragher defence via protocol manipulation. Provides causal evidence protocol reduces liability $\eta^2=0.41$ OR=12.45, compensation £28k to £8k. Moves JBE from correlational to experimental.

Integration of Four Theories: Systems, Stakeholder, Dialogical, Institutional : Article 1 integrated four theories for PR ethics, Article 2 extends to legal ethics institutionalization, culture, enforcement.

Practical Implications - Actionable Protocols for HR, PR, Legal, Compliance, Boards 5.4.1 5-Step Joint HR+PR+Legal Protocol for Reasonable Steps s109, Adequate Procedures s7, Faragher, AGG s12 Based on vignette and qualitative, the study proposed protocol that courts and regulators require.

Step 1 Policy Co-drafting Human Resources , Public Relation and Legals.

- i. Legal drafts zero-tolerance anti-harassment policy compliant Equality Act s26 s27 s109, Title VII Meritor/Harris, AGG s12, Directive 2000/43 Art 2(3), Bribery Act s7 six principles, Whistleblower Directive 2019/1937 Art 8-16.
- ii. PR ensures plain language, translates German French Dutch, ensures stakeholder input, communicates via internal campaign not just intranet.
- iii. HR ensures policy includes examples: cane/whip threat based on colour = racial harassment hostile environment, severe or pervasive.
- iv. Board top-level commitment Bribery Act principle 2.

Step 2 Interactive Training Not Tick-Box.

- i. PR delivers training with scenarios, bystander intervention, anti-victimization s27.
- ii. Document attendance 95%+, refresher annually, new joiners, managers additional training.
- iii. Training must cover: What is harassment s26, victimization s27, how to report hotline, what happens after report, zero-tolerance discipline.
- iv. For Equality Act s109 reasonable steps, EHRC Code requires training - policy alone insufficient. For Faragher, training shows reasonable care. v. Record training records for Tribunal.

Step 3 Protected Anonymous Hotline per EU Whistleblower Directive 2019/1937.

- i. Art 8 internal reporting channel, Art 9 follow-up within 3 months, Art 16 confidentiality, Art 19 protection from retaliation.
- ii. Anonymous option essential for high PDI France 68, Germany, also low PDI but fear victimization.



- iii. Third-party provider for independence.
- iv. Promoted by PR campaign: posters, intranet, town halls, multi-language. v. For oil sector, also EITI reporting channel.

Step 4 Prompt Investigation , Discipline and Faragher Prompt Corrective Action.

- i. HR investigates within 5 days, Legal advises, PR prepares communication plan.
- ii. Impartial investigator, both parties heard, confidentiality.
- iii. Discipline matrix: verbal warning, written, suspension, dismissal for serious e.g., cane/whip threat based on colour - likely dismissal for gross misconduct Equality Act.
- iv. Manager who threatened brown employees must be disciplined, not transferred.
- v. Document investigation notes, outcome, rationale.
- vi. Failure to investigate promptly loses Faragher and s109 - as in vignette delay 2 months caused liability even with protocol.

Step 5 Zero-Tolerance Communication and Documentation for Defence.

- i. PR communicates anonymized outcome: "We investigated, took action, zero-tolerance", reinforces trust, deters others.
- ii. Document all steps: policy co-drafting minutes, training attendance sheets, hotline promotion evidence, investigation file, discipline letter, communication.
- iii. For Tribunal, bundle as reasonable steps evidence s109(4), adequate procedures s7, Faragher.
- iv. For CSRD/CSDDD, EITI, UNGPs reporting, include in sustainability report with assurance.

Application to cane/whip threat case. Employer with protocol present should suspend manager pending investigation, investigate within five days, interview complainants, witnesses, manager, decide dismissal for gross misconduct racial harassment, communicate zero-tolerance, support complainants, record. Then tribunal likely finds employer took all reasonable steps, defence succeeds, liability avoided or compensation reduced to £8k vs £28k. Without protocol, employer liable s109, loses defence, unlimited compensation s124 Vento middle/more serious, EHRC enforcement, reputational damage and ESG litigation.

Culture-Sensitive Hotline Model

- i. Low PDI USA 40 UK 35 Norway 31 Netherlands 38: Open door + anonymous option, direct challenge encouraged, town halls, manager training to accept challenge Habermas ideal speech.
- ii. High PDI France 68: Anonymous mandatory, written reporting, third-party hotline, manager bypass, skip-level reporting, training for managers on power distance, anti-retaliation protection Art 19 Whistleblower Directive crucial. For Germany PDI 35 low but IDV 67 medium collectivist aspects - still need anonymous.
- iii. High IDV USA 91 UK 89: Individual reporting, self-interest framing.
- iv. Low IDV collectivist: Group framing, emphasize collective harm.

For Oil Sector, EITI/CSRD/GRI Co-drafting Protocol to Avoid Bodo Parent Liability and SEC Greenwashing

- i. Joint committee: Public relations , legals, corporate social responsibility , sustainability, operations and finance drafts EITI disclosures, CSRD double materiality assessment, GRI, UNGPs.
- ii. Legal checks such as SEC Rule 10b-5 no material misstatement, SOX 302/404 certification, CSDDD due diligence, parent duty Bodo v Shell [did parent control subsidiary operations?], Vedanta [did parent publish group policies?]. If parent organizations or companies publishes group sustainability policy claiming control, parent may assume duty and careful wording.
- iii. Public relations checks such as Stakeholder`s voice, double materiality, avoid overclaim "net zero by 2030" without basis , meaning greenwashing litigation client earth.
- iv. Assurance such as limited assurance CSRD requires external auditor, provide documentation.
- v. EITI like multi-stakeholder group, public relations facilitates civil society dialogue.



For Public Sector - Learn from Oil Transparency : GCS UK, German BMI should adopt EITI model: transparency, multi-stakeholder, PR-Legal co-drafting.

For Regulators - OECD, EITI, IPIECA, EHRC, EEOC, EU Commission

- i. OECD Public Integrity Handbook 2020 should add communication pillar - PR involvement mandatory.
- ii. EITI Standard 2023 should require PR involvement in stakeholder engagement.
- iii. EHRC Employment Code should explicitly mention PR communication as part of reasonable steps - currently mentions training but not communication campaign.
- iv. EU Whistleblower Directive implementation should require anonymous channel for high PDI cultures.
- v. IPIECA should publish PR-Legal co-drafting guidance.

For Boards and Audit Committees

- i. Legal ethics should be board agenda, not just compliance.
- ii. PR should report to board on ethics hotline trends, stakeholder concerns.
- iii. Reasonable steps documentation should be reviewed annually.
- iv. ESG litigation risk assessment should include PR-Legal co-drafting review.

LIMITATIONS AND FUTURE RESEARCH

1. Cross-Sectional Survey: Cannot prove causality PR → Legal Ethics. Future longitudinal pre/post protocol implementation, measure EEOC charges, EHRC cases, EITI scores.
2. Self-Report: Common method bias mitigated Harman 32% marker $r=0.06$ but still self-report. Future include objective outcomes: Employment Tribunal judgments, SFO enforcement, SEC enforcement, CSRD assurance opinions, EITI compliance.
3. Western Sample 6 Countries: No Global South Nigeria for Bodo case, Brazil, India high PDI. Future include Nigeria PDI 80, IDV 30, enforcement weak - test if gap larger.
4. Vignette Hypothetical: Real Tribunal decisions involve more evidence. Future analyze actual Tribunal judgments on s109 reasonable steps - content analysis of 100 cases.
5. Legal Ethics Scale New: Although $\alpha=0.90$ CFI=0.92 need further validation across contexts, test measurement invariance across sectors.
6. Culture Individual vs Country: We used individual PDI/IDV and country Hofstede scores, but culture also includes uncertainty avoidance, masculinity and future test.
7. Protocol manipulation limited to 2 levels: Present vs absent - real protocols vary in quality. Future test dose-response, training quality and hotline at anonymity level.

Future Research: Experimental vignette manipulating cane/whip threat severity and manager seniority and complainant race and protocol quality measuring liability and compensation. Also test joint protocol effectiveness in field experiment RCT randomly assign subsidiaries to protocol vs control measure harassment reports and Tribunal cases over 2 years. Also test Legal Ethics construct in other high moral intensity sectors like mining, tobacco and gambling.

National Culture Moderates: Power Distance $\beta=-0.18$ halves PR effectiveness from 0.72 low PDI to 0.36 high PDI, requires anonymous hotline per EU Whistleblower Directive 2019/1937, Individualism $\beta=0.14$ high IDV enables speaking up. Legal enforcement strength moderates $\beta=-0.22$ reducing gap 3.38 low to 2.41 high because enforcement incentivizes implementation. Oil sector PR-Legal co-drafting EITI Standard 2023, UNGPs, CSRD/CSDDD, GRI, SEC Rule 10b-5, SOX increases legal ethics 4.12 vs 3.48 $t=6.34$ $d=0.82$ large and reduces gap, avoids parent liability Bodo Community v Shell EWHC 3052 and Vedanta v Lungowe UKSC 20 and greenwashing litigation. Vignette experiment 2x2 provides first causal evidence joint HR+PR+Legal 5-step protocol [policy co-drafting, interactive training, protected anonymous hotline, prompt investigation+discipline, zero-tolerance, communication and documentation, reduces employer liability from 6.12 to 3.21 $\eta^2=0.41$ large, increases reasonable steps success OR=12.45, reduces compensation from £28.5k-32.1k to £8.2k and 12.4k unlimited s124 Vento.



Theoretical Contributions: Legal Ethics construct bridging law and business ethics, implementation gap decoupling, culture moderation first test, enforcement moderation responsive regulation, oil sector co-drafting avoiding parent liability, vignette experimental test of statutory defences in JBE FT50.

Practical Contributions: Culture-sensitive 5-step protocol for Equality Act s109 reasonable steps, Bribery Act s7 adequate procedures, Faragher prompt corrective action, AGG s12 measures, whistleblower directive Art 8 channel, EITI/CSRD co-drafting protocol, public sector learning from the oil sector transparency, regulator recommendations for OECD, EITI, EHRC, EEOC .

CHAPTER SIX

SUMMARY, CONCLUSION, CONTRIBUTION TO KNOWLEDGE

Summary

This study introduces and validates novel Legal Ethics construct bridging Luban internal legal ethics and Mason external regulatory compliance and substantive justice 14 items $\alpha=0.90$ CFI=0.92, shows implementation gap 60% where formal codes modified but informal racial harassment e.g., threatening brown employees with cane/whip based on colour persists violating Equality Act s26 hostile environment, s27 victimization, Title VII severe or pervasive Meritor 477 U.S. 57 Harris 510 U.S. 17, AGG s12, Directive 2000/43 harassment is discrimination, causing loss of reasonable steps defence s109(4), adequate procedures s7, Faragher affirmative defence. In summary, law provides liability via Equality Act s26 s27 s109, Title VII Meritor Harris Faragher, Bribery Act s7, AGG s12, Directive 2000/43, Bodo parent liability, SEC Rule 10b-5, but PR provides prevention via co-drafting, training, hotline promotion, investigation communication, documentation and moving from compliance to integrity requires not only law but using public relations process as organizational conscience and institutionalizing legal ethics, especially when legal enforcement is strong and culture low power, distance high individualism and crisis provides access to dominant coalition.

Conclusion

Law provides liability, PR provides prevention. National culture moderates - individualism helps, power distance hinders. Implementation gap explains why formal code fails - decoupling. Solution PR as organisational conscience translating law into lived culture via 4 pillars evidence reasonable steps adequate procedures due diligence. This bridges legal ethics and PR ethics, explains racial harassment case whip threat violates multiple laws but persists due to high power distance and weak enforcement, and shows how PR moves Stage 1 compliance to Stage 3 integrity.

Hence, the contribution to SDG 16 peace justice strong institutions, 10 reduced inequalities, 8 decent work, 13 climate action via oil. Despite comprehensive legal frameworks [Equality Act 2010 s26 harassment s27 victimization s109 liability, Title VII severe or pervasive hostile work environment Meritor 477 U.S. 57 Harris 510 U.S. 17, EU Directive 2000/43/EC Racial Equality Art 2 harassment is discrimination, German AGG s12, UNGPs, EITI, FCPA, UK Bribery Act], organisations still exhibit serious ethical failures including racial harassment such as a white manager threatening a brown skin employee with whip based on colour. Existing literature lacks construct linking legal ethics and PR ethics and explanation of implementation gap. Our contribution.

The study introduced novel construct in the legal ethics internal such as confidentiality, competence, conflict and external such as regulatory compliance, substantive justice, bridging Luban 2020 legal ethics and Bowen PR conscience theory. We examine why formal codes fail to prevent informal misconduct, using mixed-methods 600 professionals and 45 interviews across 6 countries. The key findings such as national culture moderates: Individualism positively moderates PR-ethics effectiveness [$\beta=0.14$, $p=0.012$], Power Distance negatively moderates [$\beta=-0.18$, $p=0.003$], supporting Habermas ideal speech and Hofstede 60% report implementation gap - formal code modified but informal behaviour persists, losing reasonable steps defence

under Equality Act s109 and adequate procedures under Bribery Act s7.

Yet, qualitative evidence such as low PDI countries like USA PDI 40, UK 35, Norway 31 used open dialogue and high PDI like France requires anonymous hotlines under EU whistleblower directive 2019/1937. Oil sector 90% cite EITI, UNGPs, Paris - PR co-drafting CSRD/GRI reports with Legal avoids SEC Rule 10b-5 and Bodo Community v Shell parent liability evidence. Theoretical fit contributes to the sections of business ethics, legal ethics, organizational ethics, cross-cultural management, human rights, whistleblowing, corporate accountability in extractive industries. The study integrates institutional theory decoupling, Habermas dialogical ethics, Hofstede culture, and stakeholder theory. Practical implications model, how PR provides prevention evidence for reasonable steps defence [Equality Act s109], Faragher defence [Title VII], adequate procedures [Bribery Act s7], due diligence [CSDDD], ESG reporting [CSRD]. The study provides joint human resources, public relations and legal protocol for harassment such as protected hotline, prompt investigation, discipline, zero-tolerance communication and documentation that prevents parent liability, that's Bodo type.

Four Contributions to Knowledge

This study makes four contributions to Scholarship such as the followings:

1. **Construct:** We introduce Legal Ethics bridging Luban internal legal ethics and Mason external regulatory compliance and substantive justice, validated $N=600$ CFA CFI=0.92.
2. **Implementation Gap:** We show 60% decoupling where formal codes modified but informal racial harassment [e.g., cane/whip threats] persists violating Equality Act s26, s27, s109, Title VII Meritor/Harris, AGG s12, Directive 2000/43, causing loss of reasonable steps s109(4), adequate procedures s7, Faragher defences.
3. **Culture Moderation:** First test of Hofstede Power Distance $\beta=-0.18$ and Individualism $\beta=0.14$ moderating PR→Legal Ethics, explaining why high PDI France 68 needs anonymous hotline per EU Whistleblower Directive 2019/1937.
4. **Practical:** Culture-sensitive joint HR+PR+Legal protocol for EITI/CSRD/GRI co-drafting avoiding Bodo v Shell parent liability and SEC Rule 10b-5 greenwashing litigation.

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