

UDK 005.21+005.5

PREGLEDNI RAD

DOI: 10.7251/FIN1902003S

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Ton na vrhu – moćan alat, ali i mač sa dvije oštrice u rukama korporativnog upravljanja

Tone at the top – a powerful tool and double-edged sword in the hands of corporate governance

Rezime

Ton na vrhu predstavlja poslovni ambijent – okruženje satkano od vrijednosti koje usmjeravaju aktivnosti i ponašanje čitave organizacije. Brojna akademska i profesionalna istraživanja pokazala su da ton na vrhu, zbog svog prožimajućeg uticaja, može imati značajne pozitivne, ali i negativne implikacije na kvalitet čitavog korporativnog upravljanja, uključujući: sisteme interne kontrole, upravljanje rizicima prevara, kvalitet finansijskog izvještavanja, te efektivnost i uspješnost poslovanja. Cilj ovog rada je da, prije svega, ukaže na značaj, ali i “dvosjeklu” prirodu tona na vrhu, te da objasni odakle potiče njegova moć, što podrazumijeva razumijevanje motivacionih faktora koji pokreću ponašanje ljudi kao pojedinaca i društvenih bića. Razumijevanje bihevioralnih mehanizama pretpostavka je za efektivno upravljanje tonom na vrhu, koje obuhvata: preuzimanje odgovornosti na svim nivoima, definisanje odgovarajućih vrijednosti i uvođenje praksi koje na njima počivaju, redovno ocjenjivanje (reviziju) tona na vrhu i vezanih rizika, te unapređivanje i promovisanje “tona na vrhu” sve dok ne postane “raspoloženje u sredini”. Na ovaj način ton na vrhu postaje “nevidljiva ruka vodilja” koja je na raspolaganju i onda kada ne postoje formalne politike i procedure, što omogućava zaposlenima da donose odluke i djeluju u potpuno novim situacijama, pri čemu su rizici da će to djelovanje odstupati od vrijednosti organizacije, u ovom slučaju, minimalni.

Ključne riječi: ton na vrhu, formalne kontrole, organizaciona kultura, ocjena, korporativno upravljanje.

Abstract

Tone at the top is a metaphor for business environment built on values affecting the activities and behavior of whole organization. A number of researches, conducted by academics and professional institutions, has shown that tone at the top, because of its pervasive influence, may have significant positive, but also negative, implications on the quality of total corporate governance including: systems of internal control, risk management, financial reporting integrity and the overall business effectiveness and success. The aim of this paper is to highlight the significance and ‘double-edged’ nature of tone at the top, and to explain what is its power built on, which implies the understanding of motivational drivers of individual and group human behavior. The comprehension of behavioral mechanisms is the prerequisite for the effective management of the tone at the top encompassing: taking the responsibility at all organizational levels, defining core values and establishing value-based practices, regular audits of the tone at the top and related risks, and finally, empowering and promoting ‘tone at the top’ until it becomes ‘mood in the middle’. This would enable tone at the top to become the ‘unseen hand’ available, even though formal policies and procedures may not be, and consequently enable employees to make decisions and act in a totally novel situations. However, the risks that these actions would deviate from the organizational values, in this case, would be minimal.

Keywords: tone at the top, formal controls, organizational culture, audit, corporate governance.

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UVOD

Interes za etičke vrijednosti i ton na vrhu organizacija naročito se povećao proteklih decenija, kada je analiza uzroka kriza velikih kompanija ukazala na disfunkcionalni ton na vrhu generalnih direktora i višeg rukovodstva. Finansijska kriza iz 2008. godine posebno je istakla značaj ovih pitanja jer je pokazala da su se disfunkcionalne prakse toliko duboko ukorijenile da su neminovno dovele do niza kolapsa koji su za posljedicu imali narušavanje stabilnosti globalne ekonomije i, na kraju, izmijenile odnose između države i finansijskih sistema u mnogim zemljama.

Ton na vrhu predstavlja koncept koji je u akademskoj literaturi obrađen sa različitih aspekata, kao što su: finansijsko izvještavanje (npr. Treadway 1987, COSO 2013, Hunton, Hoitash i Thibodeau 2011, D'Aquila i Bean 2011, Patelli i Pedrini, 2015), kvalitet rada revizorskih firmi (npr. IFAC 2007, Reding, Sobel, Anderson, Head, Ramamoorti, Salamasick i Riddle 2007, Bamber i Iyer 2009, Tervo, Smith i Pitman 2013, Pickerd, Summers i Wood 2014, Pyzoha, Taylor i Wu 2017), sistemi interne kontrole (npr. D'Aquila 1998, Doyle, Ge i McVay 2007, Yang, Zhou i Jiang, 2010, Davis i Pesch 2013, Morales, Gendron i Guénin-Paracini 2014, Merchant i Van der Stede 2017, Stojanović 2018), etika (npr. Hosmer 1994, Weaver, Treviño i Cochran 1999, Schwartz, Dunfee i Kline 2005) i poslovna uspješnost (npr. Hosmer 1994, Verschoor 1998, Booth i Schulz 2003). Poslovni lideri, profesionalne organizacije i istraživači iz oblasti računovodstva i revizije pružili su pregršt dokaza o prednostima koje ton na vrhu donosi kada je u pitanju kontrolno okruženje organizacije, njena etička kultura i integritet finansijskog izvještavanja.

Ipak, razumijevanje odakle potiče moć tona na vrhu nije moguće bez razumijevanja ponašanja ljudi kao pojedinaca i društvenih bića, te motivacionih faktora koji utiču na njihovo ponašanje (vidjeti npr: Livingston 1988, Enzle i Anderson 1993, Baumeister, Bratslavsky, Finkenauer i Vohs, 2001, Trevino et al. 2003, Eisenberger i Lieberman 2004, Tyler i Blader 2005, Tyler, Dienhart i Thomas 2008, Kross, Berman, Mischel, Smith i Wager 2011, Killingsworth 2012).

Primarno se od višeg rukovodstva očekuje da uspostavi i održi ton na vrhu organizacije putem čvrstih politika, pismene i usmene komunikacije, te direktne akcije (vidjeti npr. Minkes, Small i Chatterjee 1999, Schwartz, Kline i Dunfee 2005, CAQ 2010, ACFE 2011). I drugi autori polaze sa istog stanovišta, ističući odgovornost višeg rukovodstva i odbora direktora za ton na vrhu jer se oni tradicionalno smatraju najuticajnijima kada je riječ o promovisanju etičkog odlučivanja na srednjem i nižem organizacionom nivou (vidjeti: Schaubroeck, Avolio, Lord, Dimotakis, Hannah, Kozlowski, Trevino i Peng, 2012). Premda stručna literatura naglašava odgovornost i ključnu ulogu višeg rukovodstva, brojni autori upozoravaju na to da etički ton koji uspostavljaju rukovodioci nižeg ranga može da ima jednak uticaj na donošenje etičkih odluka od strane zaposlenih (vidjeti npr. Hansen, Stephens i Wood 2008, Tervo et al. 2012, Pickerd et al. 2014).

Iako su kompanije širom svijeta razvile različite pristupe za uspostavljanje etičkog tona, istraživanja su pokazala da mali broj kompanija obavlja redovne ocjene tona na vrhu (vidjeti: PWC Fraud Academy 2010, Hermanson, Smith i Stephens 2012). Imajući u vidu njegov značaj, brojni autori i institucije sugerisali su sprovođenje postupka revizija organizacione kulture, uključujući i ton na vrhu (npr. Castellano i Lightle 2005, Amernic, Craig i Tourish 2010), a neki od njih su se bavili i praktičnim problemima sprovođenja ovih ocjena (vidjeti npr: Hansen et al. 2008, Deloitte 2013, IIA 2017).

1. PREGLED LITERATURE

1.1. Razumijevanje „tona na vrhu“

Pojam “ton na vrhu” (engl. *tone at the top*), manje-više, odomaćio se i u našem poslovnom i stručnom žargonu, ali s obzirom na to da potiče iz engleskog jezika i zapadne korporativne kulture, važno je objasniti ga sa aspekta njegove suštine, tj. pravog značenja, koje nije baš uvijek najjasnije ni u sredinama iz kojih potiče.

Metafora koja se najčešće koristi za objašnjavanje ovog pojma jeste ta da je ton na vrhu neko specifično okruženje, tj. ambijent, atmosfera, klima ili kultura u kojoj ljudi obavljaju svoj svakodnevni posao. Rieger (2006, str. 28) navodi da se izraz “ton na vrhu” prvi put spominje u preporukama Treadway Commission iz 1987. godine, gdje se ton na vrhu koristi da opiše okruženje, uspostavljeno od strane rukovodstva, u kojem se odvija proces finansijskog izvještavanja. Kritičan i poželjan aspekt ovog okruženja je, svakako, sistem internih kontrola koje pružaju razumno uvjerenje da će nepošteno finansijsko izvještavanje biti spriječeno ili na vrijeme otkriveno. Cunningham (2005, str. 6) definiše ton na vrhu kao “zajednički set vrijednosti neke organizacije koji potiče od rukovodstva najvišeg nivoa. Može da bude formalizovan putem pisanih kodeksa i drugih politika i dokumenata, ali, što je mnogo važnije, on odražava postupke ovih rukovodilaca. Da li oni rade ono što govore?” U ovom duhu, Sheeder (2005, str. 35) tvrdi da ton na vrhu predstavlja “DNK integriteta neke kompanije” – osnovu za sve što ona radi, dok Reding i saradnici (2007, str. 7–10) opisuju ton na vrhu kao “opšteprihvaćene stavove o integritetu i svjest o kontroli, onakve kakve ispoljava najviše rukovodstvo neke organizacije”. Imajući u vidu računovodstveno-revizorske firme, IFAC-ov Odbor za transnacionalne revizore tvrdi da je ton na vrhu “standard koji postavlja rukovodstvo organizacije na osnovu kog se mjeri uspješnost; kultura unutar koje djeluju članovi organizacije; ton koji daje više rukovodstvo; nezavisno od dokumentovane strategije i politike rukovodstva, to je ona sila koja pokreće pojedince; ‘nevidljiva ruka’ koja usmjerava aktivnosti bez obzira na to koliko je rukovodstvo blizu mjesta dešavanja; i posvećenost kvalitetu usluge koju klijenti dobijaju” (IFAC 2007, str. 8).

Generalno, ton na vrhu je prepoznat kao kritična komponenta visokokvalitetnog korporativnog upravljanja koja može da ima značajan uticaj na svaki aspekt poslovanja organizacija. Zbog toga, neki autori se više fokusiraju na signale koji ukazuju na kvalitet i prirodu tona na vrhu, nego na samo objašnjavanje ovog pojma. Prema Amernicu i saradnicima (2010), dobri signali bi bili:

- usvajanje stava o nultoj toleranciji na pronevjere;
- posvećenost etičkim vrijednostima kao što su poštenje, odanost, odgovornost i pravičnost; ili
- ohrabrivanje transparentnosti i otvorenosti kod finansijskog izvještavanja.

Loši signali obuhvataju:

- njegovanje kulture arogancije, borbenosti i neobuzdanosti;
- miješanje lobista u aktivnosti regulatora kako bi se podržali interesi date organizacije;
- neispravne računovodstvene prakse (kao što su ujednačavanje prihoda ili odsustvo sistema interne kontrole);
- usvajanje stava pasivnosti ili popustljivosti;
- promovisanje kulture obmanjivanja i lažnog izvještavanja, ili
- zastrašivanje zaposlenih (posebno mogućih uzbunjivača).

INTRODUCTION

Interest in ethical values and the tone at the top of organisations has increased in recent years as analysis of major company crises' causes pointed out dysfunctional tone at the top set by CEOs and other senior managers. The financial crisis of late 2008 has focused attention on these issues again as it shown that dysfunctional practices took root, leading to a series of collapses that imperilled prosperity in the global economy, and led to changes in relationship between the state and the finance system in many countries.

Tone at the top represents a concept observed by academic literature from different angles, including: financial reporting (eg. Treadway, 1987; COSO, 2013; Hunton, Hoitash & Thibodeau, 2011; D'Aquila & Bean, 2011; Patelli & Pedrini, 2015), quality of auditing companies engagements (eg. IFAC, 2007; Reding, Sobel, Anderson, Head, Ramamoorti, Salamasick & Riddle, 2007; Bamber & Iyer, 2009; Tervo, Smith & Pitman, 2013; Pickerd, Summers & Wood, 2014; Pyzoha, Taylor & Wu, 2017), systems of internal control (eg. D'Aquila, 1998; Doyle, Ge, & McVay, 2007; Yang, Zhou & Jiang, 2010; Davis & Pesch, 2013; Morales, Gendron & Guénin-Paracini, 2014; Merchant & Van der Stede, 2017; Stojanović, 2018), ethics (eg. Hosmer, 1994; Weaver, Treviño, & Cochran, 1999; Schwartz, Dunfee & Kline, 2005) and business performance (eg. Hosmer, 1994; Verschoor, 1998; Booth & Schulz, 2003). Business leaders, professional organizations and researches in the field of accounting and auditing provided a number of evidences on benefits rednered by tone at the top in relation to the control environment, ethical culture and the intergrity of financial reporting.

However, it is not possible to understand the sources of power of tone at the top without understanding the behavior of human being as individuals but also as social beings, and motivational factor affecting their behavior (see eg. Livingston, 1988; Enzle & Anderson, 1993; Baumeister, Bratslavsky, Finkenauer & Vohs, 2001; Trevino et al, 2003; Eisenberger & Lieberman, 2004; Tyler & Blader, 2005; Tyler, Dienhart & Thomas, 2008; Kross, Berman, Mischel, Smith & Wager, 2011; Killingsworth, 2012).

Top management is primary responsible to establish and maintain adequate tone at the top of an organization by introducing firm policies, written and verbal communication and direct action (see eg. Minkes, Small & Chatterjee, 1999; Schwartz et al, 2005; CAQ, 2010; ACFE 2011). Other authors have the same standpoint when emphasizing the responsibility of top management and board of directors as they are traditionally considered the most influential regarding the promotion of ethical decisions on middle and lower organizational levels (see: Schaubroeck, Avolio, Lord, Dimotakis, Hannah, Kozlowski, Trevino & Peng, 2012). Although academic literature points out the responsibility and key role of senior management, many authors warn that the tone at the top set by lower lever managers can have equal influence on making ethical decision by employees (see eg. Hansen, Stephens & Wood, 2008; Tervo et al, 2012; Pickerd et al, 2014).

Even though the companies around the world have developed different approaches to setting ethical tone, the surveys have shown that only few of them perform regular assessments of the tone at the top (see: PWC Fraud Academy, 2010; Hermanson, Smith & Stephens, 2012). Considering its significance, many authors and institutions have suggested regular audits of organizational culture, including the tone at the top (eg. Castellano & Lightle, 2005; Amernic, Craig & Tourish, 2010), while others have dealt with practical issues related to these assessments (see eg. Hansen et al, 2008; Deloitte, 2013; IIA, 2017).

1. A LITERATURE REVIEW

1.1. Understanding 'tone at the top'

Tone at the top is a term which has, more or less, become common in our business and professional language, but as it has originated from English language and western corporate culture, it is important to explain its essence, i.e. its true meaning which may not always be clear even in places it came from.

The methaphore most often used to explain this term is that tone at the top represents a specific setting, i.e. ambient, atmosphere, climate or culture where people carry out their everyday job. Rieger (2006, p. 28) claims that the phrase 'tone at the top' first appeared in 1987 in recommendations of the Treadway Commission where it was described as an environment set by management in which financial reporting occurs. A critical, desirable aspect of this environment was the establishment of 'internal controls that provide a reasonable assurance that fraudulent financial reporting will be prevented or subject to early detection' (p. 11). Cunningham (2005, p. 6) defines tone at the top as 'the shared set of values that an organisation has emanating from the most senior executives. It can be reinforced with written codes and other policies and documents, but, more importantly, it reflects the actions of these executives. Are they "walking the talk"?' In similar way, Sheeder (2005, p. 35) claims that tone at the top is 'the company's "integrity DNA" – the foundation of all that it does, while Reding et al (2007, p. 7-10) describe tone at the top as 'the entity wide attitudes of integrity and control consciousness, as exhibited by the most senior executives of an organization'. In referring to public accounting firms, IFAC's Transnational Auditors Committee contends that tone at the top is 'the standard set by the organization's leadership whereby performance is measured; the culture within which the members of the organization operate; the tone set by senior management; irrespective of management's documented strategy and policies, it is the force that drives individual professionals; the "unseen hand" that directs activities regardless of management's proximity to the action; and a commitment to the quality of care clients receive' (IFAC, 2007, p. 8).

Generally, tone at the top has been recognized as a key element of a highly quality corporate governance which may affect any aspect of doing business. For this reason, some authors are focused more on the cues indicating the quality and nature of the tone at the top, instead on explaining the concept. According to Amernic et al (2010) good cues would be as follows:

- adopting an attitude of zero tolerance to fraud;
- committing to ethical values such as honesty, loyalty, responsibility and fairness; or
- encouraging transparency and openness in financial reporting.

While bad cues include:

- cultivating a culture of arrogance, combativeness and intractability;
- pressuring lobbyists to interfere with the activities of regulators in order to ensure the organization's interests are upheld;
- engaging in unsound accounting practices (such as income smoothing, and failing to establish internal control systems);
- adopting an attitude of passivity or complacency;
- promoting a culture of deception and misrepresentation; or
- bullying of employees (especially with likely whistle-blowers).

Institut internih revizora (2016, str. 1) priznaje da je ton na vrhu, tj. organizacionu kulturu teško definisati, ali da ona ima ogroman uticaj na dugoročnu uspješnost organizacija, razdvajajući etične poslovne aktere od onih neetičnih, cijenjene organizacije od onih nepouzdanih, organizacije koje ostvaruju svoju misiju od onih koje to ne postižu.

1.2. Korporativni sistem i ton na vrhu

Možemo da zaključimo da ton na vrhu predstavlja svojevrsan poslovni ambijent – okruženje satkano od vrijednosti koje usmjeravaju aktivnosti i ponašanje čitave organizacije. S obzirom na to da ove vrijednosti utiču na stotine odluka koje se svakodnevno donose na svim organizacionim nivoima, to omogućava organizacijama da postanu efikasne i efektivne i ostvare značajne uštede u troškovima. Ali to nije sve. Implikacije koje ton na vrhu ima na poslovanje organizacija su mnogostruke – kako u pozitivnom tako i u negativnom smislu.

Silverman (2018) vrlo živopisno objašnjava značaj tona na vrhu kada ga, zajedno sa organizacionom kulturom, svrstava u sisteme kritične za misiju, tj. sisteme koji su neophodni za opstanak nekog poslovanja ili organizacije (baš kao i prodaja, proizvodnja, finansije). Da bi se pojmiio njihov značaj, dovoljno je samo pogledati propuste u njihovom domenu, koji su rezultirali skandalima poput Wells Fargo,¹ Volkswagen² ili Uber³. I ton na vrhu i organizaciona kultura presudni su za povjerenje zaposlenih u njihove lidere, a to povjerenje počiva na poštenju, etici i integritetu. Bez ovakvog povjerenja, nemoguće je izgraditi uspješan poslovni tim, a nedostatak povjerenja neminovno dovodi do odlaska zaposlenih i gubitaka talenata koji su neophodni za postizanje uspjeha u poslovanju.

Treadway Commission (1987), čiji je cilj bio da identifikuje uzroke prevara u finansijskom izvještavanju, vjeruje da je ton koji uspostavlja više rukovodstvo (tj. korporativno okruženje/ kultura) najvažniji faktor koji doprinosi integritetu finansijskog izvještavanja, te da ima prožimajući uticaj na čitav proces sastavljanja finansijskih izvještaja. Upravo kao odgovor na incidente vezane za neodgovarajuće finansijsko izvještavanje, mnoge organizacije su vremenom uvele kodekse ponašanja, programe obuke i ostale inicijative kako bi kreirale okruženja koja jačaju etičnost u odlučivanju. Osnovna svrha ovih inicijativa je osigurati da se članovi organizacije ponašaju etično, bilo da se radi o aktivnostima unutar ili izvan organizacije (D'Aquila i Bean 2011). Međutim, uprkos vremenu i resursima koji su investirani u ove inicijative, prevare u finansijskim izvještavanjima se još uvijek dešavaju. Prema istraživanju koje je sprovelo Udruženje ovlaštenih istraživača prevara (engl. Association of Certified Fraud Examiners – ACFE 2002), prevare u finansijskim izvještajima su najskuplji vid prevare, čiji prosječni gubitak iznosi 4,25 miliona USD po šemi.

Nastavljajući napore koje je započela Treadway Commission, COSO stalno ističe činjenicu da se “efektivnost internih kontrola ne može izdići iznad integriteta i etičkih vrijednosti ljudi koji ih kreiraju, upravljaju njima i nadziru ih (1992)”. Ovo uvjerenje je samo još više učvrstila analiza oko 200 kompanija koje su na različite načine bile uključene u prevare sa finansijskim izvještavanjem u

periodu od 1987. do 1997. godine. U 83% slučajeva pokazalo se da su generalni direktor ili finansijski direktor bili uključeni u ove prevare (COSO 1999). COSO (1999) takođe je pokazao sa kakvim se sve posljedicama suočavaju kompanije, kao i njihovi zaposleni, kada su uključeni u prevare. Njihovo istraživanje pokazalo je da je preko 50% organizacija, nakon otkrivanja prevara, ili otišlo pod stečaj ili je pretrpjelo značajnu promjenu u vlasničkoj strukturi. Pored ovih posljedica, tu su i skidanje sa berzanskih lista, kao i ogromni finansijski penali.

Takođe, i državni zvaničnici su istakli da je upravo loš ton na vrhu uzrok brojnih prevara visokog profila (Cutler 2004). Tokom velikog broja angažmana vezanih za upravljanje rizikom prevara, KPMG je uočio da je efektivno upravljanje, koje podrazumijeva i postavljanje tona na vrhu, veoma važno kada se radi o stvaranju osnove za ublažavanje ove vrste rizika. Istraživanje koje je PriceWaterhouse-Coopers (PWC) Fraud Academy sprovela 2010. godine pokazalo je da se skoro 90% ispitanika slaže s tim da je ton na vrhu ključni faktor efektivnog upravljanja rizicima u vezi sa prevarama, korupcijom i etičkim ponašanjem. Istraživanje je potvrdilo da se ton na vrhu smatra neophodnim za uspostavljanje i održavanje etike i integriteta u poslovanju, te da je bez njega značajno narušena sposobnost adekvatnog upravljanja rizicima.

Svi se slažu da se ton na vrhu nikako ne bi smio potcjenjivati i zato je on nužan element i osnova efektivne interne kontrole, kao i korporativnog upravljanja. Tako su Merchant i Van der Stede (2017) identifikovali ton na vrhu kao centralnu tačku kontrole organizacione kulture, dok je Stojanović (2018) istakla da ugrađivanje etike i integriteta u interno/kontrolno okruženje, tj. kulturu bilo koje organizacije, nije moguće bez adekvatnog tona na vrhu. Jednostavno, koliko god etički programi bili dobro osmišljeni i sprovedeni, oni neće biti u stanju da ispune svoju svrhu ukoliko zaposleni za primjer imaju rukovodstvo koje se samo ponaša neetično ili prećutno prihvata takav vid ponašanja od strane drugih.

Da bi zaštitile svoje resurse, organizacije zavise kako od mekih/ neformalnih, tako i skupih, formalnih kontrola. S obzirom na to da ton na vrhu spada u tzv. meke ili neformalne vidove kontrole, koji koegzistiraju zajedno sa formalno uspostavljenim sistemom interne kontrole, Chtioui i Thiéry-Dubuisson (2011) pitaju se da li se ove kontrole međusobno nadopunjavaju ili pak mogu da zamijene jedne druge. Praveći analizu literature iz oblasti sociologije, ekonomije, menadžmenta, marketinga i strategije, Yang i saradnici (2010) zaključuju da jedan dio literature sugerise da formalne kontrole i povjerenje mogu djelovati simultano, dok neka druga istraživanja ukazuju na to da ova dva mehanizma kontrole ipak mogu da zamijene jedan drugi. Suprotno mišljenju da povjerenje i ranjivost idu ruku pod ruku, Penno (2016) identifikuje uslove u kojima se ton na vrhu i formalne kontrole međusobno dopunjavaju, ali, takođe, pokazuje i da u istom okruženju ove dvije vrste kontrola mogu zamijeniti jedna drugu. Suština je u tome da stvaranje okruženja u kojem su ljudi ponosni da rade doprinosi mnogim praktičnim prednostima (vidjeti: Harter, Schmidt i Keyes 2002), kao što su: posvećenost zaposlenih, zadovoljstvo poslom, manje fluktuacije ljudi, veća prisutnost na poslu i bolji učinci, uključujući i manji broj radnih sporova. Ovo je veoma

¹ Banka Wells Fargo morala je da plati kaznu u iznosu od 185 miliona \$ i vrati potrošačima 5 miliona \$ naknada koje su bile neosnovano naplaćene. U izvještaju nezavisne komisije za nadzor, konstatovano je, između ostalog, da je “ton na vrhu potpredsjednice banke, Carrie Tolstedt, bio ‘crvena zastavica’ koja se nije smjela ignorisati” (vidjeti: <https://newsroom.wf.com/press-release/community-banking-and-small-business/wells-fargo-board-releases-findings-independent>).

² Procijenjeni troškovi skandala iznosili su do 86 milijardi \$. Martin Winterkorn, generalni direktor VW, izvinio se javnosti zbog “užasne greške nekolicine ljudi”, ali kako se ispostavilo da to nisu bile greške već svjesno preduzete akcije, bio je prinuđen da se povuče sa mjesta direktora (vidjeti: https://www.bizjournals.com/philadelphia/morning_roundup/2015/10/volkswagen-dieseltgate-legal-ethics-silverman.html).

³ S obzirom na to da uprava kompanije nije preduzela ništa da zaštiti investitore, oni su stvar uzeli u svoje ruke i zahtijevali od generalnog direktora, Travis Kalanicka, da da ostavku. Kalanick je kritikovan zbog svog lošeg tona na vrhu, koji se ogledao u ignorisanju žalbi za seksualno uznemiravanje (što je rezultovalo velikim fluktuacijama zaposlenih), te porivu da se pobjeđuje po svaku cijenu, forsirajući granice etičnosti i zakonitosti dok nije došlo do skandala koji su narušili reputaciju kompanije i nepovoljno se odrazili na tržišno učešće (vidjeti: <https://www.bizjournals.com/philadelphia/how-to/human-resources/2017/06/with-kalanick-out-its-time-for-significant.html>).

The Institute of Internal Auditors (IIA, 2016, p. 1) admits that tone at the top, i.e. organizational culture is difficult to define, but greatly influences the long-term success of an organization, separating the ethical performers from the unethical; the valuable organizations from the questionable; those that achieve their mission from those that do not.

1.2. Corporate sistem and tone at the top

We can conclude that tone at the top corresponds to a sort of business ambient – environment woven from values influencing the operations and behavior of a whole organization. As these values affect hundreds of decisions made every day on all organizational levels, they enable organizations to become efficient and effective and achieve significant cost savings. But, that is not all. The influences that tone at the top has on the business performance are manifold – as in positive so in negative sense.

Silverman (2018) explains very vividly the significance of the tone at the top, including it, together with the culture, in the mission-critical systems – those systems “essential to the survival of a business or organization (such as sales, operations, cash management). In order to grasp their significance just a bit, it is enough to look at their failures resulting in scandals such as Wells Fargo¹, Volkswagen² or Uber³. Both tone at the top and the culture determine whether employees will trust their leaders and their fellow employees, and this trust is built on honesty, ethics and integrity. Without trust, it is not possible to build a high-performance team, and lack of trust results in employee turnover and losing talents needed to achieve business success.

The National Commission on Fraudulent Financial Reporting (Treadway Commission, 1987), whose objective was to identify the causal factors of fraudulent financial reporting, believed the tone set by senior management (i.e., the corporate environment/culture) is the most important factor contributing to the integrity of the financial reporting process and has a pervasive impact on the entire process by which an organization’s financial reports are prepared. As a response to the incidences related to fraudulent financial reporting, many organizations have developed Codes of Conduct, training programs, and other initiatives to create environments that foster ethical decisions. The major purpose of these initiatives is to ensure that organizational members behave ethically when involved in activities both internal and external to the organization (D’Aquila & Bean, 2011). However, despite all the resources and time invested in such initiatives, financial reporting frauds still occur. According to the survey conducted by the Association of Certified Fraud Examiners (ACFE, 2002), frauds in financial reporting are the most expensive type of fraud costing in average \$ 4.25 million by scheme.

Continuing the efforts of Treadway Commission, the Committee of sponsoring Organizations of the Treadway Commission (COSO), notes that the effectiveness of internal controls cannot rise above the integrity and ethical values of the people who create, administer, and monitor them. (1992, p. 19). This belief was reemphasized by COSO (1999) based on their analysis of approximately 200

companies involved in alleged instances of fraudulent financial reporting from 1987 through 1997. In 83% of the cases, either the chief operating officer or the chief financial officer was reported as being associated with the financial statement fraud. COSO (1999) has also showed what are the consequences for the companies and their employees when engaged in frauds. Their survey demonstrated that, after frauds were discovered, more than 50% of organizations went bankrupt or suffered significant change in ownership. Besides, other consequences included delistings and huge financial penalties.

Also, government officials have pointed to poor tone at the top as causing many high profile frauds (Cutler, 2004). KPMG have observed, over various fraud risk management engagements, that effective governance including setting the tone at the top is important in laying a foundation for mitigating fraud risks. The survey conducted by PriceWaterhouseCoopers (PWC) Fraud Academy in 2010, demonstrated that nearly 90% of survey respondents agree that tone from the top is critical in the effective mitigation of risks related to frauds, corruption and ethical behavior. The survey confirmed that tone at the top is vital in developing and maintaining business ethics and integrity, and that without it, the ability to mitigate the risk of something going wrong is significantly impaired.

Everybody agrees that tone at the top should not be underestimated and that is why it is the key element and basis of effective internal control and corporate governance. Thus, Merchant and Van der Stede (2017) identified tone at the top as a central control point of the organizational culture, while Stojanović (2018) emphasized that embedding ethics and integrity in control/internal environment, i.e. culture of an organization is not possible without adequate tone at the top. No matter how good ethical programs have been created and introduced, they will not be able to accomplish their mission if employees, as role models, have leaders who do not behave ethically or tacitly accept such behavior by others.

In order to protect their resources, organizations depend on both soft/informal and expensive formal controls. As tone at the top belongs to, so called, soft or informal controls, coexisting together with formally established internal control system, Chtioui and Thiéry-Dubuisson (2011) argue whether the use of one could replace or could complement the use of the other. Similarly, Yang et al. (2010) perform a literature review of sociology, economics, management, marketing, and strategy literatures and conclude that relevant literature suggests that formal and informal control can act simultaneously, whereas other research argues the two control mechanisms can substitute for each other. Contrary to the belief that trust and vulnerability go hand-in-hand, Penno (2016) identifies conditions where tone at the top and optimal formal controls are complements, but he also show, in the same setting, that tone at the top and optimal formal controls can be substitutes. The point is that creating an environment where people are proud to work has been shown to produce many other, equally practical advantages (see e.g. Harter, Schmidt & Keyes, 2002) such as employee engagement, job satisfaction, reduced turnover, better attendance, and enhanced performance, not to mention a reduction in employment litigation. This is very significant insight, because

¹ Wells Fargo Bank was fined \$185 million and ordered to reimburse customers \$5 million in fees they were charged due to these unethical practices. In the Report of independent supervisor, it was stated that toxic tone at the top of Carrie Tolstedt, the former vice president of Community Bank, was a red flag that was ignored. (see: <https://newsroom.wf.com/press-release/community-banking-and-small-business/wells-fargo-board-releases-findings-independent>)

² Wells Fargo Bank was fined \$185 million and ordered to reimburse customers \$5 million in fees they were charged due to these unethical practices. In the Report of independent supervisor, it was stated that toxic tone at the top of Carrie Tolstedt, the former vice president of Community Bank, was a red flag that was ignored. (see: <https://newsroom.wf.com/press-release/community-banking-and-small-business/wells-fargo-board-releases-findings-independent>)

³ As Uber’s board didn’t protect the interests of the company’s investors, they stepped in to protect their own interests demanding that CEO Travis Kalanick resign from his position. Kalanick had been under criticism for his poor tone at the top and culture that ignored sexual harassment complaints from female employees (causing many to leave the company), and his drive to win at nearly all costs by pushing ethical and legal boundaries to the limit created scandals dok nije došlo do skandala, damaging the company’s reputation and adversely affecting its market share. (see: <https://www.bizjournals.com/philadelphia/how-to/human-resources/2017/06/with-kalanick-out-its-time-for-significant.html>)

važan uvid, jer ako ton na vrhu stvara okruženje u kojem se mogu postići isti ili čak bolji rezultati od onih koje pružaju skupe formalne kontrole, to stvara nevjerovatne mogućnosti za unapređenje kvaliteta poslovanja i postizanja veće efikasnosti.

Značaj tona na vrhu posebno se ističe u oblasti nezavisnih, profesionalnih usluga, kao što je revizija. Brojni autori, ali i profesionalne organizacije, dotakli su se ove teme. Tako, npr., Međunarodna federacija računovođa (IFAC) ističe da je “ton na vrhu važan pokretač kvaliteta revizije” (IFAC 2007, str. 4). Ovo potvrđuju Tervo i saradnici (2012), čiji nalazi pokazuju da na revizore posebno utiče ton koji postavljaju partneri firme, ali i radni odnosi koje revizori imaju sa neposrednim rukovodiocem revizije. U velikom broju slučajeva, upravo ovi faktori okruženja utiču na to da li će revizorsko osoblje da slijedi ili ne sugestije svog supervizora koje su u suprotnosti kako sa programom revizije tako i sa važećim računovodstvenim standardima.

Prema tome, ton na vrhu ima značajne pozitivne, ali i negativne implikacije na upravljanje rizicima, kvalitet finansijskog izvještavanja i revizorskih usluga. Ono što je još značajnije jeste njegov značaj u pogledu efektivnosti i uspješnosti poslovanja, koji potvrđuju brojna akademska istraživanja. Hosmer (1994) pokazao je da organizacije čiji ton počiva na etičkim pravilima imaju znatno bolje šanse za uspjeh nego one koje se ponašaju nepošteno i neetično. Istraživanje koje je Gilden (1995) sproveo pokazalo je, takođe, da potrošači preferiraju da kupuju od kompanija koje su osjetljive na svoje okruženje i ispoljavaju dobro ponašanje, a investitori da investiraju u njih. Verschoor (1998) pruža dokaze da korporacije koje ističu etiku u korporativnom upravljanju postižu veći finansijski uspjeh, dok Booth i Schulz (2003) otkrivaju kako snažna etička okruženja smanjuju tendenciju rukovodilaca da ostaju pri neuspješnim projektima. Pored svega navedenog, ton na vrhu može uticati i na odluke eksternih revizora u pogledu ocjene rizika, što utiče na visinu naknada eksternih revizora (vidjeti: Hansen et al. 2008), tj. bolji ton na vrhu znači niži rizik, a niži rizik dovodi do nižih cijena revizorskih usluga.

Značaj tona na vrhu nije ograničen samo na profitne organizacije. Tako je, npr., u finalnom izvještaju Istraživanja o integritetu organizacije Ujedinjenih nacija⁴ naglašen značaj tona na vrhu kako bi se ohrabrio dobro etičko ponašanje. Očigledno je, dakle, da ton na vrhu predstavlja prepoznat recept za uspjeh, bez obzira na način kako se taj uspjeh definiše.

Ipak, uprkos opštem prihvatanju tona na vrhu, i dalje su prisutna kontrolna/interna okruženja koja počivaju na suprotnim principima. To znači da organizacije i ljudi koji njima upravljaju, zapravo, ne razumiju na čemu počiva moć tona na vrhu. Organizacije moraju da shvate da ono što zaista pokreće ponašanja zaposlenih u organizacijama jeste ono što vide i čuju svaki dan od rukovodilaca, kojima podnose izvještaje, kao i kolega sa kojima svaki dan rade.

2. REZULTATI ISTRAŽIVANJA I DISKUSIJA

2.1. Izvor moći i odgovornost za ton na vrhu

Cilj ove rasprave nije da potcijeni značaj formalnih kontrola, kao irelevantnih i nepotrebnih, jer ljudi zaista reaguju na podsticaje, pozitivne ili negativne, posebno ako se radi o velikim kaznama ili nagradama. Međutim, ono što ovdje želimo da objasnimo jeste zašto

ton na vrhu ima toliku moć i tako dalekosežne i duboke implikacije na ponašanje ljudi i organizacija.

Radi se o tome da poruke koje prenose pojedine formalne kontrole i mjere mogu da imaju mnogo veći uticaj na ponašanje zaposlenih od samih mjera (vidjeti: Killingsworth 2012). Na primjer, uvođenje kazne za kašnjenje, zapravo, može da prenese poruku da je kašnjenje prihvatljivo ukoliko se plati odgovarajuća cijena. U nekim drugim slučajevima, mogućnost ostvarivanja velikih bonusa za postignute ciljeve (ostvaren plan) postaje sve ono što je bitno, jer prenosi poruku da nije važno na koji način će se cilj ostvariti (vidjeti: Grant i Singh 2011). U oba ova slučaja, skrivena poruka, tj. ton sadržan u uvedenim podsticajima, istisnula je ili “zamaglila” odgovarajuće društveno očekivanje ili etičku normu (vidjeti npr: Frey i Oberholzer-Gee 1997, Frey i Jegen 2011). Još jedna poruka skrivena u komunikaciji zasnovanoj na komandi i kontroli jeste ta da rukovodstvo ne vjeruje zaposlenima. Enzle i Anderson (1993) ukazuju na to da nadzor usmjeren ka kontroli, kao što su ocjenjivanje uspješnosti ili otkrivanje kršenja pravila, ima značajan negativan uticaj na unutrašnju motivaciju ljudi da obavljaju svoj posao. Pored toga, ukoliko nije naveden dobronamjeren razlog za ovaj vid nadzora, zaposleni su skloni da zaključe kako se radi o nepovjerenju u njih i njihov rad. Mogući sporedni efekti ove poruke se kreću od srdžbe prema rukovodstvu, preko stava “mi protiv njih”, do negativnog Pigmalion efekta koji za posljedicu ima da se zaposleni ponašaju upravo onako kako rukovodstvo od njih i očekuje (vidjeti: Livingston 1988).

Stručnjaci i akademici znaju da odluke o ponašanju, koje počivaju na vrijednostima ili pozitivnim normama ponašanja grupe, mnogo efektivnije doprinose usklađenosti nego odluke koje se zasnivaju na eksternim rizicima i nagradama. To je zato što su unutrašnji (primarni) motivacioni pokretači ponašanja mnogo jači i dominantniji nego spoljašnji (sekundarni) motivacioni faktori. Tom Tyler je sa svojim saradnicima (2005, 2008) pokušao da identifikuje faktore koji imaju najveći uticaj na dobrovoljnu usklađenost na radnom mjestu, takođe poznatu kao “individualna samoregulacija”. Tyler i njegovi saradnici otkrili su da će ljudi svojevolumeno poštovati pravila neke organizacije ukoliko vjeruju u njenu “legitimnost”, a legitimnost će biti utoliko veća što se organizacija više smatra etičnom i pravednom u svojim odnosima prema zaposlenima i trećim licima. Trevino i saradnici (2003) došli su do istog zaključka u svojim istraživanjima koji se tiču uticaja fer odnosa na usklađenost, tj. poštovanje formalnih pravila i procedura. Oni su otkrili da je percepcija zaposlenih o fer odnosu na poslu veoma snažno povezana sa pojavama nedoličnog ponašanja – što je više pravičnosti, manje je nedoličnog ponašanja. Tyler i saradnici (2005, 2008) takođe su otkrili da će pojedinac radije poštovati pravila ukoliko vjeruje da su organizacione vrijednosti usklađene sa njegovim vlastitim vrijednostima. To znači da su legitimnost organizacije i usklađenost organizacionih vrijednosti sa vrijednostima zaposlenih najuticajniji faktori koji doprinose poštovanju pravila, znatno više nego nagrade za dobro ponašanje ili strah od kazne zbog njihovog kršenja. Nije teško zapaziti da su oba ova faktora direktno povezana sa tonom na vrhu.

Da bi se razumjela moć tona na vrhu, veoma je važno pojmiti i socijalni aspekt ljudske prirode i ponašanja. Jedna od najsnažnijih potreba ljudi jeste da se osjećaju dobro u vezi sa samima sobom, tako da, kao društvena bića, koriste grupe koje podržavaju i hrane njihove identitete i njeguju pozitivnu sliku koju imaju o samima sebi (Blader i Tyler 2009). S druge strane, grupe su sklone da ne opraštaju ponašanje koje odstupa od društvenih i očekivanja grupe. Postoje i naučni dokazi da se bol, koju ljudi osjećaju zbog odbacivanja od

⁴ Istraživanje o percepciji organizacionog integriteta sproveo je Deloitte & Touche LLP po narudžbi Kancelarije za usluge internog nadzora, a kao dio procesa pokretanja Inicijative za integritet organizacije (vidjeti: <https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwjRnaD1oNngAuhUozqYKHfP7BbkQFJAeGQIABAC&url=https%3A%2F%2Fsuepo.org%2Ffrights%2Fpublic%2Farchive%2Fintegritysurvey.pdf&usq=AOvVaw1SDjSHlt05SElygzUUDm->).

if tone at the top may create the ambient where the same results can be achieved as with expensive formal controls, this provides incredible possibilities for improvements in performance quality and higher efficiency.

Tone at the top is especially significant in delivering independent professional services such as audit. Many authors, but also professional organizations, discussed about this topic. Thus, International Federation of Accountants (IFAC) contends that tone at the top is an important driver of the audit quality (IFAC, 2007, p. 4). This has been confirmed by Tervo et al (2012) whose findings indicate that auditors are influenced by the tone that the partner sets for the firm, but also by the working relationship that the staff auditor has with the supervising senior auditor. In many cases, it is these environmental factors that influence the staff auditor's decision of whether or not to follow a course of action suggested by the supervisor that is contrary to both the audit program and relevant auditing standards.

Therefore, tone at the top do have significant positive but also negative implications on the risk management, quality of financial reporting and auditing services. Even more important is its contribution to business effectiveness and success confirmed by many academic research. Hosmer (1994) finds evidence that organizations that adhere to ethical precepts have a significantly better chance of success than those engaged in dishonest and unethical behavior. Research, carried out by Gilden (1995), showed that consumers prefer to purchase from and invest in companies that are environmentally sensitive and display good behavior. Verschoor (1998) provides evidence that corporations that emphasize ethics as a part of corporate governance have higher financial performance, while Booth and Schulz (2003) find that strong ethical environments reduce managers' tendency to continue failed projects. Besides all the above-mentioned, tone at the top can influence external auditors' decisions and consequently external audit fees (see: Hansen et al, 2008), i.e. better tone at the top means lower risk, and lower risk leads to the lower costs of auditing services.

The importance of tone at the top is not confined to for-profit organizations. The United Nations Organizational Integrity Survey 2004⁴, Final Report, for example, stressed the importance of the United Nations having an appropriate tone at the top if it was to encourage good ethical behavior. It is obvious, therefore, that tone at the top represents a recognized prescription for success, no matter how success can be defined.

However, despite general recognition of the tone at the top, there are still control/internal environments based on opposite principles. This means that organizations and people running them, actually do not understand where the power of the tone originates from. Organizations need to realize that what really drives behaviors in an organization is what employees see and hear every day from the managers they report to and the colleagues they work alongside daily.

2. RESULTS AND DISCUSION

2.1. The Source of Power and Responsibility for the Tone of the Top

The aim of this discussion is not to underestimate the importance of formal controls as irrelevant and unnecessary as people do react to incentives, positive or negative, especially if they include severe

punishments or rewards. However, the intetnion is to explain here why tone at the top carry such a great power, and so far-reaching and profound effects on human and organizational behavior.

The point is that message hidden in some formal controls and incentives may have much grater effect on human behavior than incentive itself (see: Killingsworth, 2012). For example, if fine, introduced to prevent lateness, is quite affordable, it sends message that being late is actually acceptable. In other cases, the prospect of a large bonus for achieving a certain goal may signal that reaching the goal is all that matters, regardless of the method used to get there (see: Grant & Singh, 2011). In both cases, the incentive's message, i.e. the tone has displaced, or "crowded out," a competing social expectation or ethical norm (see e.g. Frey & Oberholzer-Gee, 1997; Frey & Jegen, 2011). Another message hidden in the command-and-control communication is that management does not trust the employees. Enzle and Anderson (1993) find that surveillance that is perceived as having the purpose of control, such as evaluating performance or detecting rule violations, has a significant negative impact on intrinsic motivation to perform a task. Also, if a benign explanation for task surveillance is absent, employees are likely to conclude that management do not trust them nor their work. Potential side effects of this message range from resentment, to an "us-versus-them" attitude towards management, to a reverse-Pygmalion effect in which employees may tend to "live down" to the low expectations that are projected upon them (see: Livingston, 1988).

Experts and academics know that behavior decisions, based on values or positive norms of group behavior, contribute to compliance more effectively than decisions based on external risks and rewards. The reason is that inner (primary) motivational drivers of behavior are much stronger and more dominant than external (secondary) motivational drivers. Tom Tyler et al (2005, 2008) tried to select factors which have the greatest impact on voluntary compliance in the workplace, also known as individual 'self-regulation'. They discovered that people would voluntarily obey authority if they believe it is 'legitimate'. A company's authority is considered legitimate only to the extent that the organization is perceived as being ethical and fair in its interactions with employees and third parties. Trevino et al (2003) have reached the same conclusion in their researches aimed specifically at exploring the role that workplace fairness perceptions play in compliance. They found that employee perceptions of overall fairness in the workplace are very strongly correlated with the incidence of misconduct—the more fairness, the less misconduct. Tyler et al (2005, 2008) also found that a person is more likely to follow rules if he believes that the company's values agree with his own. This means legitimacy and value congruence were actually more influential on compliance than either rewards for good behavior or fear of punishment for transgressions. It is not difficult to notice that both of these factors are directly connected to the tone at the top.

In order to understand the power of tone at the top it is also important to comprehend a social aspect of human nature and behavior. One of the strongest human needs is to feel good about oneself and that is why people use groups to support and nourish their identities and cultivate positive self-concepts (Blader & Tyler, 2009). On the other hand, groups can be unforgiving of behavior that deviates from group social and behavioral expectations. There are scientific proofs that the pain, felt as a result of group rejection,

⁴ The Organizational Integrity Perception Survey has been conducted by Deloitte & Touche LLP and ordered by the Office of Internal Oversight Services, in order to develop an Organizational Integrity Initiative (see: [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=2ahUKEwj3q7zxuuPhAhVeThUIHR8UA2QQFjABegQIABAC&url=http%3A%2F%2Fmirror.unhabitat.org%2Fdownloads%2Fdocs%2F5443_24704_2106_Report3.24.pdf&usq=AOvVaw12d1Cr9rJYInlUA90GSHYI\)=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwjRnaD1oNngAhUozqYKHfP7BbKQFjAAegQIABAC&url=https%3A%2F%2Fsuepo.org%2Frights%2Fpublic%2Farchive%2Fintegritysurvey.pdf&usq=AOvVaw1SDjSHiLt05SElygzUUDm-](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=2ahUKEwj3q7zxuuPhAhVeThUIHR8UA2QQFjABegQIABAC&url=http%3A%2F%2Fmirror.unhabitat.org%2Fdownloads%2Fdocs%2F5443_24704_2106_Report3.24.pdf&usq=AOvVaw12d1Cr9rJYInlUA90GSHYI)=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwjRnaD1oNngAhUozqYKHfP7BbKQFjAAegQIABAC&url=https%3A%2F%2Fsuepo.org%2Frights%2Fpublic%2Farchive%2Fintegritysurvey.pdf&usq=AOvVaw1SDjSHiLt05SElygzUUDm-))

strane grupe, doživljava jednako kao i fizička bol (vidjeti npr.: Eisenberger i Lieberman 2004, Kross et al. 2010). Uzevši sve to u obzir, nije ni čudo što ljudi žele, po svaku cijenu, da budu dio grupe, tako da pripadnost i dobar položaj u nekoj grupi postaju moćan motivacioni faktor ponašanja ljudi. Što je značaj koji pojedinac pripisuje nekoj grupi veći, to će on više nastojati da se identifikuje sa tom grupom i usvoji njen sistem vrijednosti. Posljedica svega toga je sklonost ljudi da pristaju na pravila ponašanja koja ne moraju uvijek da budu u skladu sa njihovim istinskim, unutrašnjim vrijednostima. Ovdje leži moć tona na vrhu, ali i opasnost koju nosi sa sobom ukoliko je neadekvatan. Upravo u tome se ogleda njegova "dvosjekla" priroda.

Na kraju, treba imati u vidu još jedan razlog zašto je ton na vrhu "mač sa dvije oštrice". Istraživanja pokazuju da su negativna iskustva mnogo istaknutija, dublje utisnuta u sjećanje i uticajna od onih pozitivnih (vidjeti npr.: Baumeister et al. 2001). Ukoliko uzmemo u obzir sve interakcije između rukovodilaca i zaposlenih, na svim organizacionim nivoima, i zamislimo uticaj jednog jedinog narušenog povjerenja, lako je zapaziti kako djeluje "tamna strana" tona na vrhu i kako samo nekolicina lidera koji njeguju negativan ton mogu brzo da dovedu do gubitka povjerenja u čitavu organizaciju.

Ovo su izuzetno važni uvidi jer objašnjavaju prirodu ljudskog ponašanja i moć koju ima odgovarajući ton na vrhu. Ukoliko je ovaj ton adekvatan i zaposleni primaju jasne i nedvosmislene poruke o tome kako se treba ponašati, onda nije ni potrebno da postoje politike, procedure ili stručnjaci za svaku novu situaciju koja se pojavi u poslovanju. Koliko god bio ekstenzivan i dobro osmišljen sistem internih kontrola unutar neke organizacije, on nikada ne može da bude toliko fleksibilan da odgovori na sve promjene i nepredviđene situacije koje se svakodnevno dešavaju. Od ljudi se očekuje da donose odluke i djeluju u potpuno novim situacijama koje nisu uvijek obuhvaćene postojećim procedurama, tako da ton na vrhu ovdje djeluje kao "nevidljiva ruka vodilja" koja je na raspolaganju i onda kada formalne kontrole nisu. Međutim, ukoliko ton na vrhu počiva na strogim komandama i kontrolama, on šalje poruku zaposlenima da uvijek traže smjernice iz eksternog izvora. Onda nije ni čudo što se pojavljuju razni vidovi nedoličnog ponašanja motivisanog očekivanjem velikih nagrada, male vjerovatnoće otkrivanja ili uticajem kolega koji ne mare za etične norme ponašanja.

2.1.1. Odgovornost rukovodstva za ton na vrhu

Udruženje ovlaštenih istraživača prevara i Centar za kvalitet revizije smatraju da je etički ton koji uspostavlja više rukovodstvo kritičan za sprečavanje, otkrivanje i odvratanje od prevara (CAQ 2010, ACFE 2011). Imajući u vidu da zakonski propisi, očigledno, nisu u stanju da spriječe korporativne skandale, Schwartz i saradnici (2005) navode kako je nužno da lideri firme utemelje ispravan etički "ton na vrhu". Oni naglašavaju da izvršni direktori i članovi odbora moraju da pružaju vlastiti primjer i tako promovisu ton na vrhu kojim se usmjeravaju aktivnosti unutar organizacije.

Polazna tačka za uspostavljanje tona na vrhu počinje sa najvišim rukovodstvom neke organizacije, što je u većini slučajeva odbor direktora. Odbor postavlja ton unutar organizacije na način koji će omogućiti da on ispuni svoje odgovornosti kao što su: zapošljavanje generalnog direktora, odobravanje poslovne strategije, nadziranje ostvarenja plana, definisanje sklonosti ka riziku, te odgovarajući nadzor u pogledu ublažavanja rizika, a sve s ciljem da se sačuva i kreira vrijednost za akcionare. Međutim, nijedna od odluka odbora ne utiče toliko na ton na vrhu kao izbor generalnog direktora (Deloitte 2014). Generalni direktor je lice organizacije i glavna osoba od koje zaposleni očekuju viziju, vođstvo i usmjeravanje. On je taj koji bi trebalo jasno da saopšti koliki je značaj etičkog ponašanja u organizaciji i ovaj stav podrži kako svojim riječima, tako i djelima

(Minkes et al. 1999). Njegova je odgovornost da prenese poruku svim zaposlenima da je etičnost osnovna i strateška komponenta vizije organizacije. Ukoliko to ne učini, zaposleni će etičke programe vidjeti baš onakvim kakvi i jesu – kao prazna obećanja (D'Aquilla i Bean 2011).

Dakle, članovi odbora (odbor direktora, odbor za reviziju), kao i izvršni rukovodioci, imaju odgovornost za uspostavljanje tona na vrhu, ali i njegovo prenošenje na niže nivoe, kako bi taj "ton sa vrha" postao "raspoloženje u sredini". Na osnovu svog dugogodišnjeg iskustva u reviziji i savjetovanju, Deloitte (2014) smatra da se to može postići tako što će više rukovodstvo osigurati primjenu izvjesnih praksi, kao što su: odgovarajući pristup zapošljavanju i provjeri zaposlenih (gdje se prilikom zapošljavanja prioritet daje karakteru, pored stručnosti i hemije); socijalizacija i obuka zaposlenih (mentorstvo i dopunska obuka moraju da prenose identične poruke u cilju jačanja etičke kulture); sistemi nagrađivanja (nagrađivanje i priznanja zaposlenima ne samo za ono što rade već i za način na koji to rade) i postupci prilikom odlaska zaposlenih (isti nivo poštovanja ljudi prilikom njihovog odlaska, kao i prilikom dolaska u organizaciju).

COSO (2013) u svom dokumentu Interna kontrola – Integralni okvir ukazuje na to da ton na vrhu pruža etičku osnovu koja bi trebalo da utiče na etičko odlučivanje kako zaposlenih na najnižem organizacionom nivou, tako i rukovodilaca srednjeg i višeg ranga, te da su za interne kontrole odgovorni svi zaposleni unutar organizacije. Ovo je vrlo bitno naglasiti i razumjeti jer pojedinci su skloni da smatraju neetičko ponašanje opravdanim u onoj mjeri u kojoj to mogu da racionalizuju (vidjeti: Mazar, Amir i Ariely 2008), a neetično ponašanje njihovih kolega i pretpostavljenih je najveći argument za ovakvu racionalizaciju. Tako su Pickerd i saradnici (2014), u svom istraživanju, pokazali da više rukovodstvo (partneri firmi) ne može samo da ojača etički ton unutar organizacije, već da na njega utiču svi zaposleni, na svim nivoima (posebno neposredni rukovodioci). Do istog zaključka su došli i drugi autori (npr. Hansen et al. 2008, Tervo et al. 2012, Kroll 2013) ukazujući na uticaj nižih rukovodilaca na kulturu i ponašanje zaposlenih kojima su nadređeni.

2.1.2. Odgovornost internih revizora

Funkcija interne revizije, koja bi trebalo da doda vrijednost organizaciji kroz svoje aktivnosti uvjeravanja i savjetovanja, svakako ima posebnu odgovornost kada je u pitanju ton na vrhu. Standardi interne revizije navode da "aktivnost interne revizije mora da ocjenjuje i daje odgovarajuće preporuke za unapređenja korporativnog upravljanja... promovišući odgovarajuću etiku i vrijednosti unutar organizacije... (kao i putem) efektivnog saopštavanja informacija o rizicima i kontroli odgovarajućim dijelovima organizacije" (Standard 2110, IIA 2016). Na osnovu zahtjeva ovog standarda, moguće je identifikovati dva vida odgovornosti funkcije interne revizije kada je u pitanju "ton na vrhu": (1) da ohrabri odbor za reviziju i više rukovodstvo u pogledu uspostavljanja odgovarajućeg tona na vrhu, te (2) da periodično ocjenjuje etičku klimu sa aspekta organizacione kulture i tona na vrhu (vidjeti: Reding i saradnici 2007).

Moglo bi se reći da su interni revizori u jedinstvenoj poziciji da pomognu u unapređenju tona na vrhu. Nalazi do kojih su došli Hansen i saradnici (2008) sugerisu da su interni revizori svjesni svoje sposobnosti da utiču na ton organizacije i doprinesu poboljšanju tona na vrhu i identifikovali su šest mogućih načina kako da to postignu. Prema ovim autorima, odgovornosti internih revizora u pogledu tona na vrhu bi obuhvatale:

1. ocjenjivanje i izvještavanje o tonu na vrhu;
2. proširivanje ove ocjene kako bi ona uključila i ton višeg rukovodstva, a ne samo generalnog i finansijskog direktora;

is being experienced the same way as physical pain (see e.g. Eisenberger & Lieberman, 2004; Kross et al, 2010). Considering all the above mentioned, it is not surprising that people want, at all costs, to be part of a group, and that is why affiliation and good position in a group become such a powerful motivator of behavior. The more important the group is to an individual, he/she will be more willing to identify positively with the group and internalize the group's values. As a result, people are inclined to accept rules of behavior which may not be in line with their own intrinsic values. This is the source of tone at the top's power but also a danger if the tone is inadequate. That is also the explanation of its 'double-edged' nature.

There is one more reason why tone at the top is considered to be a 'double-edged' sword. Studies show that negative experiences are much more salient, memorable and influential than positive ones (see Baumeister et al, 2001). If we consider all the management interactions that workers are exposed to, at all levels of management, and imagine the impact of a single betrayal of trust when an employee is directly involved, it is easy to see how 'dark side' of the tone at the top works and how only a few leaders, cultivating a negative tone, can rapidly dismantle employees' trust in the organization.

All these insights are very important as they explain the nature of human behavior and the power of adequate tone at the top. If the tone is adequate and employees receive clear and unambiguous messages on how they are expected to behave, then there is no need for policies, procedures or experts for every new situation occurring in business. No matter how extensive and well created the system of internal controls could be in an organization, it can never be so flexible to adjust to all changes and unpredictable situations happening daily. People are expected to make decisions and act in novel situations where authoritative guidance like policies, procedures, or specialists are unavailable. Therefore, tone at the top is needed as an 'invisible guiding hand' available even when formal controls are not. However, if tone at the top is based on a strong command-and-control environment, it sends the message that employees should look externally for guidance. Thus, it is not surprising when people become engaged in misconduct motivated by high payoff, a low likelihood of detection, or a unethical and persuasive co-worker.

2.1.1. Management's responsibility

The Association of Certified Fraud Examiners and Center for Audit Quality have opined that the ethical tone set by senior management is critical to preventing, detecting, and deterring fraud (CAQ 2010; ACFE 2011). Since legislation alone is, obviously, not able to prevent corporate scandals, Schwartz et al has argued that it is essential that a firm's leadership establish the proper ethical 'tone at the top'. They emphasize that executives and directors need to lead by example and thereby promote the tone at the top as a way of orienting an organization.

The starting point for setting the tone begins with the organization's governing authority, which is, in most cases, the board of directors. The board sets the tone of the organization in the way that it executes its responsibilities such as hiring the CEO, approving business strategy, supervising the realization of plans, defining risk appetite and adequate monitoring relating to risk mitigation in order to maintain and create the value for shareholders. However, perhaps no single decision drives tone at the top more than the selection of the CEO (Deloitte, 2014). The CEO is the face of the organization and the figurehead to whom employees ultimately look for vision, guidance and leadership. A CEO should clearly communicate the importance of ethical behavior in the organization and support this position through words and actions (Minkes et al, 1999). A CEO

must communicate that an ethical organization is an essential and strategic component of the organization's vision. If CEO fails to do so, that will result in employees perceiving ethics programs for what they are – merely lip service (D'Aquila & Bean, 2011).

Therefore, the board (board of directors, auditing committee) members and executive management carry the responsibility to set tone at the top, but also to transfer it to a lower organizational levels, so the tone at the top can become mood in the middle. Based on their long-term experience in auditing and consulting, Deloitte (2014) believes it can be achieved if senior management ensuring certain organizational practices are in place at all levels, including: recruiting and screening methodologies (when hiring new people, character should be given priority, besides competence and chemistry); socialization and training (Mentoring and additional training must offer consistent messages to foster an ethical culture); reward systems (recognition and rewards not only for what employees do, but how they do it), and employee exits policies (people leaving the organization should be treated as respectfully as when they were brought in).

COSO (2013) in its document Internal Control – Integrated Framework indicates that tone at the top provides ethical foundation which should influence all ethical decisions of entry-level employees as well as mid- and upper-level managers, and emphasizes that all people in an organization are responsible for internal controls. It is very important to stress out and understand this as individuals are prone to consider unethical behavior acceptable to the degree they can rationalize it (see: Mazar, Amir & Ariely, 2008), and unethical behavior of their colleagues and leaders is the major argument for this rationalization. Thus, Pickerd et al (2014), in their research, have showed that senior executives (partners) and directors cannot foster an ethical tone within organizations by themselves, but rather employees at all levels of organizations influence the ethical tone within organizations. Other authors have reached the same conclusion (e.g. Hansen et al, 2008; Tervo et al, 2012; Kroll, 2013) emphasizing that the influence of lower-level executives on culture and the subordinated employees.

2.1.2. Internal auditors' responsibility

The internal audit function (IAF), which should add value to an organization by providing its assurance and consulting services, definitely has special responsibility relating to the tone at the top. Internal Auditing Standards state that the "internal audit activity should assess and make appropriate recommendations for improving the governance process... (by) promoting appropriate ethics and values within the organization... (and by) effectively communicating risk and control information to appropriate areas of the organization" (Standard 2110, IIA 2016). In terms of this Standard, it is possible to identify two types of IAF's responsibility relating to the 'tone at the top': (1) to encourage the audit committee and senior management to set the proper tone at the top, and (2) periodically to assess the ethical climate in the context of organizational culture and the tone at the top (see Reding et al, 2007).

Thus, internal auditors are in a unique position to help improve the tone at the top of an organization. The findings presented by Hansen et al (2008) suggest that internal auditors are aware of their ability to influence the tone of the organization and appear to be working to improve the tone at the top, and they identified six potential ways to achieve this goal. According to these authors, internal auditors' responsibilities related to the tone at the top include:

1. Assessing and reporting on tone at the top.
2. Expanding the assessment of tone to include more of the upper-management than just the CEO and CFO.

3. osiguranje da ocjenu tona na vrhu višeg rukovodstva obavljaju interni revizori sa dovoljno iskustva i poznavanja višeg rukovodstva;
4. ispitivanje kojim licima se dostavljaju ocjene tona;
5. ispitivanje da li se može postići veća efikasnost u radu kroz smanjenje obima testiranja u onim oblastima u kojima snažan ton na vrhu obezbjeđuje niži nivo rizika;
6. razmatranje da li bi se ton mogao poboljšati ukoliko bi interni revizori ocjenjivali i davali mišljenje o tonu koji uspostavlja odbor direktora.

2.1.3. Problematika ocjenjivanja tona na vrhu

Imajući u vidu moć, značaj i implikacije tona na vrhu, kako na usklađenost, ispravnost finansijskog izvještavanja, sprečavanje prevara, tako i na kvalitet cjelokupnog upravljanja, razumljivo je da postoji potreba za ispitivanjem i ocjenom tona na vrhu, kao i rizika koji iz njega proizlaze. Nažalost, iako COSO već decenijama naglašava značaj organizacione kulture, a posebno "tona na vrhu", stručna i akademska javnost to nekako sporo prihvata.

Istraživanje koje je 2010. godine sproveda PWC Fraud Academy ukazalo je na postojanje širokog spektra pristupa koje kompanije koriste za uspostavljanje etičkog tona⁵. Međutim, iako je 77% ispitanika izjavilo da rukovodstvo ima jasno definisan set vrijednosti i principa, samo 36% njih je potvrdilo postojanje redovnih ocjena njihovog značaja i primjene. Ovo potvrđuje i istraživanje koje su sprovodili Hermanson i saradnici (2012), a koje je pokazalo da, uprkos naglasku koje organizacije stavljaju na ton na vrhu, čini se da ga mnoge kompanije ne ocjenjuju redovno. S druge strane, ova istraživanja su pokazala da je ton na vrhu snažniji u organizacijama koje sprovode njegovu ocjenu, nego kod onih koje to ne čine, čime se sugeriše da ocjena tona na vrhu zaista dovodi do njegovog jačanja.

Castellano i Lightle (2005, str. 10) zalažu se za sprovođenje revizije organizacione kulture u okviru koje bi se ocjenjivao "ton na vrhu, kao i stav prema internim kontrolama i etičkom odlučivanju". Oni naglašavaju važnost ocjenjivanja tona na vrhu kao dio izvještavanja o internoj kontroli tvrdeći da ton na vrhu (koji uspostavlja generalni direktor i viši rukovodioci) utiče na organizacionu kulturu, te da neodgovarajući ton može lako da dovede do većeg rizika prevarnog finansijskog izvještavanja i objasni slučajeve kolapsa korporacija. Takođe, Amernic i saradnici (2010) promovisu ideju da bi revizori trebalo da, prilikom ocjene revizorskog rizika, uzmu u obzir i rizike vezane za poslovno rukovodstvo, tj. rizike koji proizlaze iz neodgovarajućeg tona na vrhu rukovodstva. S obzirom na to da je, prema ovim autorima, pismo generalnog direktora, koje se upućuje akcionarima u okviru godišnjih izvještaja, jedan od medijuma putem kojih korporativni lideri saopštavaju svoje stavove i vrijednosti, analizirajući sadržaj ovih pisama revizori i drugi korisnici bi mogli steći dragocjen uvid u ton na vrhu datih korporacija.

Kao što je već spomenuto, značaj praćenja i ocjene tona na vrhu sastavni je dio posla koji obavlja funkcija interne revizije. Međutim, problematika ove ocjene u velikoj mjeri zavisi od toga koga funkcija interne revizije izvještava. Iako rukovodstvo organizacije (generalni direktor i ostali izvršni direktori) treba da bude svjesno i informisano o svom tonu na vrhu i njegovim implikacijama na rizike i poslovanje, stručnjaci su mišljenja da bi bilo mnogo prihvatljivije da interni revizori o tome razgovaraju sa odborom za reviziju, a ne sa samim rukovodstvom (vidjeti: Hansen et al. 2008). Osjetljiva priroda tona na vrhu, kao i ostalih mekih kontrola, podrazumijeva da bi za njegovu

ocjenu, ipak, trebalo da bude ispunjeno nekoliko pretpostavki kao što su: podrška višeg rukovodstva i odbora (formalna i neformalna), odgovarajuća pozicioniranost funkcije interne revizije unutar organizacije, te postojanje odgovarajućih kriterijuma za ocjenu (vidjeti: IIA 2017). Redovne ocjene tona na vrhu bi, na ovaj način, doprinijele njegovom jačanju, a sa druge strane bi niži rizici koji proizlaze iz snažnog tona na vrhu omogućili internoj reviziji da svoje resurse usmjeri na pružanje savjetodavnih i ostalih usluga koje bi dodale vrijednost njihovim organizacijama.

Pristupi ocjenjivanju tona na vrhu svakako će zavisi od specifičnosti date organizacije i informacija koje revizorima i drugim licima stoje na raspolaganju. Primjera radi, Deloitte (2013) identifikovao je desetak načina na koje se može ocjenjivati ton na vrhu, a oni obuhvataju sljedeće: analiza stepena i prirode prestupa, reputacije u medijima, tona prisutnog u saopštenjima rukovodstva; korištenje anonimnosti prilikom prijavljivanja uočenih incidenata; anketiranje zaposlenih; grupne diskusije; posjete različitim dijelovima organizacije; razgovori sa osobljem koje napušta organizaciju; intervjui i fokus grupe; te analiza žalbi klijenata.

2.1.4. Upravljanje tonom na vrhu

Uspostavljanje odgovarajućeg tona na vrhu počinje sa identifikovanjem seta temeljnih vrijednosti. Nijedna organizacija ne dolazi na svijet sa ovim vrijednostima, već treba da ih sama otkrije ili utvrdi kakve bi one trebalo da budu. Preporuka je da spisak temeljnih vrijednosti bude kratak, da se ne tiče isključivo etike i usklađenosti, ali da odražava misiju, ciljeve i strukturu organizacije, definiše očekivanja, usmjerava ponašanje u ključnim oblastima djelovanja, te da inspiriše zaposlene. Izjava o temeljnim vrijednostima prilika je da se izdvoje najbitniji elementi pozitivne organizacione kulture dok se istovremeno, u širem smislu, definiše kako se to ovdje radi. Upravljanje tonom na vrhu znači kreirati i održavati organizacionu kulturu u kojoj svi snose odgovornost za ispravno ponašanje, jer je tako ispravno. Za uspostavljanje i održavanje pravog tona na vrhu ključni su sljedeći principi (PWC, 2013):

- rukovodstvo mora da pruža konzistentnu i otvorenu podršku etici i pitanjima vezanim za usklađenost;
- prije uvođenja bilo kakvih promjena, potrebno je najprije razumjeti kulturu koja preovladava u datoj organizaciji;
- lideri moraju konzistentno "raditi ono što govore", a ne "raditi ono što žele", na način koji je usklađen i jača vrijednosti i etičke standarde organizacije;
- otvoreno i transparentno davanje nagrada i priznanja za dobro ponašanje, a obavezno reagovanje odgovarajućim postupcima na loše ponašanje;
- uvođenje sistema i procesa kojima se podržava ton na vrhu (kao "uobičajeni način poslovanja") kako bi se omogućilo kreiranje odgovarajuće organizacione kulture i periodično ocjenjivanje efektivnosti postupaka i ponašanja lidera.

Uvođenje odgovarajuće kulture – tona na vrhu – zahtijeva pristup kakav se koristi u marketinškim kampanjama. Cilj je da se bude i ubjedljiv i prožimajući, da se okruženje preplavi pozitivnim potsjetnicima tako da se poželjne mentalne asocijacije javljaju kad god je potrebno. To podrazumijeva saopštavanje konzistentnih poruka što je češće moguće i kroz što je više moguće kanala (pismena i usmena saopštenja, blogovi i tvitovi, upotreba skrinsjevera, postera, nagrade i priznanja, elektronske poruke, veb-stranice i video-klipovi).

⁵ Ovi pristupi obuhvataju: uvođenje seta ključnih vrijednosti i principa, redovno saopštavanje etičkih vrijednosti od strane rukovodstva, pa čak i odustajanje od poslova koji nisu usklađeni sa etičkim vrijednostima same organizacije.

3. Ensuring that internal auditors with sufficient experience and interaction with upper management are performing tone at the top assessments.
4. Examining who receives results of tone assessments.
5. Examining whether efficiency gains can be achieved by reducing testing in areas where a high tone at the top reduces the risk of problems.
6. Considering whether tone would improve if the internal auditors evaluated and opined on the tone set by the Board of Directors.

2.1.3. Issues of estimating 'ton at the top'

Considering the power, significance and the implications of the tone at the top in terms of compliance, financial reporting integrity, fraud prevention and the quality of overall governance, it is understandable that there is a need for estimating and auditing tone at the top and the related risks. Unfortunately, although COSO has been emphasizing the importance of organizational culture, including tone at the top, for decades, it seems that professionals and academics accepts that rather slowly.

The survey carried out by PWC Fraud Academy in 2010, has shown that there are a wide range of approaches being used to establish the foundations for ethical tone⁵. However, 77% of respondents state that leadership teams have an articulated set of values and principles but only 36% regularly assess them for relevance and applicability. The survey conducted by Hermanson et al [36] has provided similar conclusions indicating that (p. A36) despite the emphasis placed on an organization's tone at the top it appears that many companies do not regularly assess the tone at the top. On the other hand, these surveys have shown that the organizations which assess corporate culture regularly have stronger tone at the top then the organizations not conducting regular assessments of the tone at the top suggesting that regular assessments/audits of tone at the top do provide its empowerment.

Castellano and Lightle (2005, p. 10) suggested the conduct of a cultural audit in which an assessment is made of 'the tone at the top and the attitude toward internal controls and ethical decision making'. They argued that the tone at the top (set by CEOs and senior managers) affects the culture of an organization; and that an inappropriate tone is likely to increase the risk of fraudulent financial reporting and help explain cases of corporate collapse. Also, Amernic et al (2010) promoted the idea that auditors should address the issue of business leadership risk in assessing audit risk – that is, that they should give particular attention to the risk of an organizational leader setting an inappropriate tone at the top. Considering that, according to these authors, the CEO's letter to shareholders in annual reports is one medium used by corporate leaders to communicate their attitudes and values, and that by analyzing the text of such letters, auditors and other users can gain an insight into the 'tone at the top' of major corporations.

As mentioned before, monitoring and estimation of tone at the top is part of the internal audit's function engagements. However, the issues related to these estimations depends, to a great extent, on the fact who receives the reports from the internal audit function. Although an organization's management (CEO and other executive managers) should be aware and informed of their tone at the top and its influences on risks and operations, experts believe that it would be more acceptable if internal auditors communicate their findings to the auditing committee instead of management (see

Hansen et al, 2008). Sensitive nature of tone at the top, like other soft controls, indicate that in order to estimate it, there are some preconditions which should be provided such as: support from senior management and the board or the audit committee (formal and informal), internal auditing's reporting structure should be sufficiently independent to ensure minimal or virtually no scope limitation of the audit team, availability of appropriate criteria for assessment... (see IIA, 2017). Regular audits of tone at the top would certainly enable its empowerment, but, on the other hand, lower risks, resulting from this, would enable internal auditors to engage more resources in providing consulting services which are more likely to add value to their organizations.

The approach to the tone at the top's estimation would definitely depend on the specifics of an organization and the information available to auditors and other entities. For example, Deloitte (2013) has identified ten ways to estimate tone at the top, including: determining the extent and nature of wrongdoing; social media reputation; tone of management communications; use of anonymity in incident reporting; employee surveys; group discussion; facility visits; exit interviews; interviews and focus groups, and analysis of customer complaints.

2.1.4. Managing tone at the top

Establishment of adequate tone at the top starts with identifying the set of core values. No company was born with a silver values statement, but they are supposed to find out what they are or determine what they should be. It is suggested that, by its nature, a core values list must be short, and cannot be exclusively concerned with ethics and compliance. It should reflect mission, objectives and structure of an organization, define expectations, guides behavior in key areas, and inspire employees. The values statement is an opportunity to distill the most important elements of a positive culture while at the same time defining in broader terms how things are done around here. Managing tone at the top means creating and maintaining organizational culture where everybody carries the responsibility for proper behavior, because it is right thing to do. Following principles are key to establishing and sustaining the right tone at the top (see PWC, 2013):

- Management should provide consistent and visible executive sponsorship for ethics and compliance-related issues;
- Understand what the prevailing culture is first, before attempting to make any wide-sweeping changes;
- Leaders must consistently 'do as they say', not 'do as they want to do', in a way that is aligned and enforces the values and ethical standards of an organization;
- Good behaviors must be rewarded and recognized, poor behaviors must be acted upon and necessary action undertaken, openly and transparently;
- Embedding systems and processes to support the tone at the top (as 'business as usual') in order to help shape the organizational culture and measure the effectiveness of leadership actions and behaviors over a period of time.

Embedding the right culture – tone at the top – requires the implementation of the approach such as that used in marketing campaigns. The goal is to be both persuasive and pervasive, to flood the environment with positive cues so that the desirable mental associations surface readily when needed. This means

⁵ These approaches include: establishing a set of core values and principles, regular communications of ethical values by leadership, and even declining business where it is not aligned with the ethical values of the business.

Kad je riječ o preporukama kako jačati organizacionu kulturu, tj. ton na vrhu, jedan od načina jeste kroz priče. Priče je lako upamtiti i prenijeti dalje, a s obzirom na njihovu dugotrajnost i domet, ne iznenađuje da se svaka kultura replicira i obnavlja upravo kroz priče kojima je protkana (vidjeti: Killingsworth, 2012). U kontekstu etike i vrijednosti, priče pomažu da apstraktni problemi postanu konkretni i dokučivi, posebno kada zaposleni mogu da se identifikuju ili saosjećaju sa njihovim akterima. Na ovaj način, priče primarno pomažu ljudima da uoče probleme, ali i da nauče kako da ih uspješno prevaziđu, uključujući i traženje pomoći kada je to prikladno.

Još jedan način kako jačati ton na vrhu jeste kroz motivaciju putem priznanja, jer ona šalju vrlo korisnu poruku. Čak i kada je priznanje uručeno privatno, ono govori onome ko ga prima da organizacija cijeni kako odgovarajuće ponašanje, tako i samu osobu kojoj se uručuje priznanje, što doprinosi njenoj većoj posvećenosti datoj organizaciji i poštovanju autoriteta. Ukoliko se priznanje javno uručuje, korist je višestruka jer i drugi svjedoče posvećenosti date kompanije etici i usklađenosti, što šalje pozitivnu sliku o samoj kompaniji.

Na kraju, jedna od najvažnijih inicijativa u ovom pogledu bila bi propagiranje “tona na vrhu” sve dok on ne postane “raspoloženje u sredini”. Killingsworth (2012) sugerise da se ovo može postići kroz obuke rukovodilaca i članova odbora usmjerene na razvijanje “mekih” vještina i etička pitanja, ubacivanje “etičkih momenata” na sastancima rukovodstva i, najbitnije od svega, kroz uvođenje standarda ponašanja za rukovodstvo, posebno ono na najvišem nivou.

ZAKLJUČAK

Nema sumnje da kakav god primjer (ton) rukovodstvo daje, on ima prožimajući uticaj na sve zaposlene u organizaciji. Ukoliko ton, koji uspostavlja najviše rukovodstvo, promovise etičko ponašanje i integritet, zaposleni će biti spremniji da se drže tih istih vrijednosti jer su one u skladu sa njihovim individualnim vrijednostima. Sa druge strane, ukoliko top menadžment teži za profitabilnošću, po svaku cijenu, on tako šalje poruku zaposlenima da etičko ponašanje nije prioritet, što za posljedicu ima veći rizik pojavljivanja različitih vidova prestupa, uključujući i prevare koje se, na kraju, veoma skupo plaćanju.

Uspostavljanje pravog tona na vrhu sve se više smatra ključnom vještinom lidera da vode i podižu uspješne organizacije, bez obzira na njihovu veličinu, lokaciju ili prirodu poslovanja. To je izraz koji se sve češće vezuje za razvijanje i definisanje standarda etičkog ponašanja i ulogu lidera u kreiranju etičke kulture koja je jedan od najznačajnijih pokazatelja dobrog korporativnog upravljanja. Ljudi imaju povjerenje u lidere za koje vjeruju da su etični, pri čemu se ta etičnost uglavnom procjenjuje na osnovu toga da li lideri svojim postupcima opravdavaju njihovo povjerenje. Povjerenje koje zaposleni imaju u svoje rukovodiocce direktno se odražava na to koliko vjeruju u svoje organizacije. Ako imaju povjerenja u svoju kompaniju, ljudi joj se dive, identifikuju se sa njenim ciljevima i interesima, njena pravila smatraju legitimnim i ponašaju se u skladu sa njima. S druge strane, fer pravila i politike, koji se sprovode na fer način, ukazuju na posvećenost kompanije etici, što automatski doprinosi povjerenju kako u kompaniju, tako i u njeno rukovodstvo.

Kauzalna veza između tona na vrhu i poštovanja politika i procedura (formalnih kontrola) očigledna je kao što je očigledno da formalne kontrole neće biti u stanju da ispune svoju svrhu ukoliko zaposleni za primjer imaju rukovodstvo čije ponašanje ne krasi etika i integritet. Nažalost, činjenica da mnoge organizacije i dalje njeguju kontrolna okruženja koja počivaju na suprotnim principima

govori o tome da organizacije, a posebno rukovodioci, ne razumiju dovoljno faktore koji utiču na ljudsko ponašanje i moć vlastitog primjera – tona na vrhu.

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communicating consistent messages as often as possible and through as many channels as possible (verbal and written statements, blogs and tweets, use of screensavers, posters, awards and recognition, e-mails, web pages, and videos).

When talking about recommendation how to strengthen the organizational culture, i.e. tone at the top, one of ways is through stories. Stories are easy to remember and pass along, and considering their durability and reach, it is not surprising that every culture replicates and renews itself through stories (see Killingsworth, 2012). In the context of ethics and values, stories help make abstract issues concrete and accessible, especially when employees can sympathize or identify with one of the characters. This way, stories primary help people to spot issues, but also to teach them how to navigate these issues successfully, including seeking help where appropriate.

Another way to strengthen tone at the top is through recognitions as motivators, as they send a beneficial message. Even if given privately, it tells the recipient that the organization values both the relevant behavior and, by extension, the recipient, and will tend to reinforce the employee's commitment to the organization and her acceptance of its authority. If public, the benefit is multiplied as others in the organization witness this affirmation of the company's commitment to ethics and compliance, which sends a positive image of the company itself.

Finally, one of the most important of initiatives, in this respect, would be propagating the tone at the top until it becomes the mood in the middle. Killingsworth (2012) suggests that this could be achieved by training executives and board members in terms of 'soft' skills and ethics, by adding 'ethical moments' to management meetings, and, most crucial of all, enforcing management behavioral standards, especially for high performers.

CONCLUSION

There is no doubt that whatever ethical example (tone) top management sets, it has a pervasive effect on all the employees in the organization. If the tone, set by top managers, promotes ethical behaviors and integrity, employees will be more inclined to hold the same values as they are in line with their own personal values. On the other hand, if top management forces profitability at all costs, this might signal to employees that ethical conduct is not a priority, leading to various forms of misconduct, including frauds which turned out to be extremely costly.

Setting the right tone at the top is increasingly viewed as a critical leadership skill in leading and growing successful organizations, whatever the size, location or nature of the business. It is a phrase that is becoming increasingly associated with developing and defining standards of ethical business conduct and the role of leaders in setting the ethical culture which is one of most significant indicator of good corporate governance.

Employees trust leaders whom they believe to be ethical, while at the same time one of the main ways they judge a leader's ethics is by observing whether their actions justify their trust. Also, employees' trust in leaders is directly reflected on the trust they have in their organizations. If they trust their organization, they admire it, identify with its goals and interests, accept its rules as legitimate ones and behave accordingly. On the other hand, fair rules and policies, fairly applied, show an ethical commitment at the corporate level which automatically contributes to trust in both – the organization and its leadership.

Causal link between tone at the top and compliance (formal controls) is obvious just as it is obvious that formal controls will not be able to serve their purpose if employees as a role model have leaders who behave unethically and without integrity. Unfortunately, the fact that many organizations still cultivate control environments which are founded on the opposite principles, indicates that organizations, and especially leaders, do not understand sufficiently factors which influence human behavior and the power of their own example – tone at the top.

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