

TRANSPARENCY IN PUBLIC RELATIONS: EVIDENCE FROM ASSOCIATIONS' ETHICS CODES

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ABSTRACT

The issue of transparency in public relations, or as it is more often referred, the conflict of interest, belongs to the group of the crucial ethical issues. Nevertheless, among scholars, there exist the question of how strict the imperative of transparency should be, not just concerning the cultural differences or the areas in the world where public relations professionals come from. Given the reputation of the public relations profession, which is still partially marked with negative labels, the issue of transparency in self-regulation of professionals in PR is of utmost importance. Aiming to explore the importance of transparency for PR professionals, and how this issue is regulated, the research was conducted through a method of qualitative content analysis based on 13 ethical codes, delivered by 18 major associations of public relations professionals at national and international levels, which belong to the Western Circle: United States, Great Britain, Germany, Austria, Italy, Spain and Croatia. Although the value of transparency is articulated in all ethical codes, there exist some differences, especially if a distinction is made between conflicts of interest and financial interests. In this respect, few differences emerged with regard to the character of membership in associations (individual/corporative/mixed membership), or their type (national or international) and much less within the geographical milieu of the association. The core finding is actually “the struggle” between the principle level and the operational level of transparency in PR-field: is it possible to be “ethically correct” just if PR-professionals announce that they are in conflict of interests and the client has nothing against?

KEY WORDS

transparency, conflict of interests, public relations, ethics

CLASSIFICATION

JEL: D83, M3

INTRODUCTION

When the initiator of the first international ethics code in public relations French PR-expert Lucien Matrat (1907-1998) stated that “without ethical practice, public relations has no purpose” [1; p.565], and when in 1965 the International Public Relations Association (IPRA) adopted under his leadership International Code of Ethics – which became known as the Code of Athens (mostly inspired by United Nation’s Universal Declaration of Human Rights of 1948) – ethical debate, or better to say, ethical negotiations were initiated and in the way they are present until today. That, decades long negotiation process, started when part of IPRA members stated that the code is so ambitious that automatically challenges association members to violate its rules, and that the code is also restricting “their human rights to employment as they wished” [2; p.711]. In other words, that ethical debate, grew after the first international ethic code, also became the matter of transparency of interests or conflict of interests in the public relations area.

The professionalization of any profession, including public relations, besides affirming the profession on the “professional chart of the world”, always brings quite specific challenges that can often be reduced to ethical issues [3]. This research seeks to focus on the ethical issue of transparency as a value, or principle, in public relations, which in practice is mostly reduced to the issue of conflict of interest. Although nowadays, PR associations, that are active in practically every developed part of the world, have the code of ethics [4], ethical problems have not disappeared. On the contrary, they also appear to the extent that the existing solutions contained in the codes are not sufficient [5]. Just to address a few old-new questions: Can a public relations practitioner at the same time work for two clients competing with each other? Can PR practitioners provide presents or favours to journalists or politicians? What is the difference between benevolent rewards and corruption in this regard? For public relations professionals (PRs), these issues belong to the category of every-day life. Therefore, it is no surprise that the concept of transparency, or more often used concept of conflict of interests, become an integral part of many ethics codes in public relations, although codes do not address these issues in the same way. At the same time, there is also no consensus among scholars on these issues [6].

As the answer of Sriramesh and Verčič’s [7] call for “further research needs in the area of global public relations”, in 2014 came huge research of Kim and Ki, who examined public relations professional associations in 107 countries and their 45 ethics codes. They aimed to identify the universal and relativistic values among those codes and associations. “The values most frequently identified were honesty, safeguarding confidences, and conflicts of interest, which were evident in at least half of the ethics codes analysed” [6; p.253]. They find out that conflicts of interest of competing clients were determined to be a relativistic value, and honesty and safeguarding confidences of clients were classified as universal values. They strongly appeal that value of conflict of interest “should be added as a core universal value for the public relations profession in consideration of its occupational nature” [6; p.253].

The year after, 2015, there was also published the research of Taylor and Yang, who analysed the codes of ethics of 41 PR associations across the world. Their research brought six dominant themes emerged from the codes of ethics: professionalism, advocacy, moral standards, clients’ interests, expertise, and relationships. Answering the general question whether global values have emerged, Taylor and Yang wrote that “there is a core of professional values that have emerged in public relations across the world” but “no global ethics model has yet to emerge”. They also pointed out that “public relations associations recognize the dual-responsibility for the profession to serve both clients and society/public’s interests” [8; p.553].

Both types of research mentioned above focused itself on the national and international review of the ethics codes and generally made important conclusions. Nevertheless, by analysing the issue of transparency of interests, there is still space for at least four additional views of the state, since the character of the PR-associations was not always put into consider. The aims of this research are to answer the questions: How transparency is manifested in the positioning within the ethic codes and between the terms of particular codes of associations active in Western countries; How is transparency expressed in the association's codes with regard to their membership type and with regard to "geographic origin" within the West? And, finally, how is resolved one of the more challenging ethical issues: can a PR expert act ethically if there is a conflict of interest?

METHODOLOGY

The research was conducted on a sample of 13 ethics codes of 18 public relations associations, which represents individual, corporative, and mixed membership (Table 1). Since it is assumed that the Western states will have resolved legal regulations regarding transparency, or at least they are not in the "red zone" of Transparency International list [9] for this research are selected PR associations from countries of the Western Circle, and include 11 national codes among EU member states and the United States of America, and 2 international codes.

National PR-associations codes are taken from the following countries in the European Union (in alphabetical order), Austria (PRVA Code – Code of Conduct of the Austrian Public Relations Association with mixed membership), Croatia (CPRA Code – Croatian Public Relations Association Code of Ethics with individual membership), Germany (DRPR Code – The German Communication Code accepted by different association with mixed membership), Italy (Two codes: the first is FERPI Code – Italian Public Relations Federation Code of Professional Conduct with individual membership, and second is with corporative: Professional Principles and Codes of Conduct for Public Relations in Italy – Assorel Code), Spain (Two codes – first belongs to association with individual membership, and the second with corporative: Association of Communication Managers Code of Ethics – Dircom Code; and Association of Communication and Public Relations Consultancy Companies Code of Ethics – ADECEC Code), United Kingdom (Two codes – both belonging to associations with mixed membership: PRCA Professional Charter – PRCA Code; and Chartered Institute of Public Relations Code of Conduct – CIPR Code). In USA PRSA Code of Ethics – PRSA Code – where PRSA has an individual membership and The PR Council Code of Ethics and Principles – PR Council Code – for corporative memberships of the association.

The codes of two international associations are both excluding membership of individual PRs: Global Protocol on Ethics in Public Relations – GA Code – gathers associations and institutions (e.g. universities and faculties) and The ICCO Stockholm Charter – ICCO Code is signed by corporative and association's members. Each of 13 codes was analysed in their version published at associations web-sites till September 2017. The research matrix was made, according to the traditional methodological guidelines for the qualitative content analysis [10], and each code was analysed under two basic criteria, shaped to address specific terms/concepts strictly connected to the principle of transparency [11] the conflict of interests (the financial interest here is excluded) and financial transparency.

The principle of transparency of interests is present directly in 12 of 13 analysed codes, although it is mostly reduced through the term "conflict of interests" (the only ethic code that does not treat transparency of interests in any direct connection is Global Alliance code, but it mentions conflicts in general). This research uses the term transparency since the term "conflict of interests" holds in itself negative connotation.

Table 1. Analysed codes of public relations associations.

Association short name / country	Association full name	Membership type
PRVA / Austria	Public Relations Association Austria (Public Relations Verband Austria)	Mixed
CPRA / Croatia	Croatian Public Relations Association (Hrvatska udruga za odnose s javnošću)	Individual
DPRG / Germany	German Public Relations Society (Deutsche Public Relations Gesellschaft)	Mixed
FERPI / Italy	Italian Public Relations Federation (Federazione Relazioni Pubbliche Italiana)	Individual
Assorel / Italy	Association of Communication and Public Relations companies (Associazione imprese di comunicazione e relazioni pubbliche)	Corporative membership
PRCA / UK	Public Relations Consultants Association	Mixed
CIPR / UK	Chartered Institute of Public Relations	Mixed
Dircom / Spain	Association of Communication Managers (Asociación de Directivos de Comunicación)	Individual
ADECEC / Spain	Association of Communication and Public Relations Consultancy Companies (Asociación de Empresas Consultoras en Relaciones Públicas y Comunicación)	Corporative membership
PRSA / USA	Public Relations Society of America	Individual
PR Council / USA	Public Relations Council	Corporative membership
GA / International	Global Alliance for Public Relations and Communication Management	Corporative membership (associations+institutions)
ICCO / International	International Communications Consultancy Organization	Corporative membership (associations+agencies)

“The principle of transparency” as a value represents itself in a positive way and could be understood through “ethical triangle” between public relations practitioners, clients/employers and the public. Or, as the code of USA’s PRSA explains: “Avoiding real, potential or perceived conflicts of interest builds the trust of clients, employers, and the publics.” The intention of public relations is, according to them, “to earn trust and mutual respect with clients or employers” and to “build trust with the public by avoiding or ending situations that put one’s personal or professional interests in conflict with society’s interests”.

German DRPR Code also teaches that the successfulness of public relations is rooted in the trust of different publics, because “they are permitted to take the side of their employer or client consistently, but if they do not wish to undermine the employer’s or client’s credibility

and reputation, as well as the credibility of the entire profession, their work must be transparent and eschew dishonest practices”.

The transparency as a principle also has its practical dimension, as PR Council pronounces: “Our overriding principle is that openness and transparency not only are in the public interest, they are also necessary tools for meeting our clients’ objectives. Our bias in counseling clients is toward disclosure, which we believe is appropriate as a principle and effective as a communications tool”. Furthermore, the transparency can be considered as a corporative public relations communication tool and has its strength, especially in social responsibility communication. Transparency even became its “crucial principle” [12; p.256] and in the context of socially responsible business operations “positively affect the company’s reputation, employee motivation, consumer loyalty, protection from bad managerial decisions and long-term profitability” [13; p.141].

Although the principle of transparency can be used in the context of transparency of the information or “as a synonym with integrity, values, forthcoming, accessible, open, and clarity” [14; p.566], in this study the principle of transparency is focused on transparency of different interests, including financial interests. Based on this framework, we pose four research questions:

RQ 1: How transparency is manifested in the positioning within the codex and between the terms of particular codes of associations active in Western countries?

RQ 2: How transparency is expressed in the association’s codes with regard to the membership type in associations?

RQ 3: How transparency is expressed in the association’s codes with regard to the national/international type of association?

RQ 4: How transparency is experienced in the association’s codes with regard to “geographic position” within the West?

RESULTS

The importance of the principle of transparency of interests, or conflict of interest, is visible in the fact that most of the analysed codes have a special textual part to this aspect (it necessary to note that not all analysed codes have organized their own text in sections). These are the following seven codes: CPRA (section: transparency and conflict of interest), the DRPR (section: transparency), the FERPI (section: specific obligations for economic and financial information and specific obligations for the legitimate representation of private interests at the institutions), ASSOREL (section: competing positions, fees, the advisory role), the CIPR (section: transparency and avoidance of conflict of interest), the PRSA (section: conflicts of interest), the GA (section: guide for decision-making, honesty) and ICCO (section: conflicts).

In the 13 analysed codes, 14 terms were found to be related to the value of transparency of interest. Under that concept most commonly used term in codes were: conflict of interest, transparency; financial interests; gifts, presents and favours; improper influence, tie-in transactions; corruption; third parties; surreptitious advertising; kickbacks; use of power; threats and contradictory positions.

The principle of transparency can be divided into two categories. The first is a conflict of interests without direct financial effects, and the second is the category of financial transparency. There are 7 terms which can be situated in the category of conflict of interests (non-financial). The first term, conflict of interests, is present in 12 analysed codes (few of them are using variations to the term, what is put in brackets in Table 2). The second term,

Table 2. Two types of transparency.

Conflict of interest (non-financial) terms	Codes using terms	Financial transparency terms	Codes using terms
Conflict of interests	PRVA CPRA DRPR FERPI CIPR DIRCOM PRSA ICCO ASSOREL (conflicting assignments) PRCA (interest declared) PR COUNCIL(conflicts) GA (conflicts) Total: 12 associations	Financial interest	CPRA FERPI CIPR ADECEC PRSA Total: 5 associations
Transparency	CPRA DRPR CIPR DIRCOM PR COUNCIL Total: 5 associations	Gifts, presents, and favours	PRVA HUOJ FERPI DRPR (granting them benefits) PRCA (not offer or give any inducement) PRSA (example) Total: 6 associations
Competing employers/clients	CPRA DRPR PRSA ASSOREL Total: 4 associations	Tie-in transactions	PRVA HUOJ FERPI PR COUNCIL Total: 4 associations
Improper influence	DRPR FERPI PRCA PRSA Total: 4 associations	Third parties	FERPI ADECEC PR COUNCIL Total: 3 associations
Use of power	PRVA CPRA (abuse of position and authority) Total: 2 associations	Corruption	CPRA FERPI ADECEC Total: 3 associations
Contradictory positions	DRPR Total: 1 association	Kickbacks	CPRA PRCOUNCIL Total: 2 associations
Threats	DRPR Total: 1 association	Surreptitious advertising	PRVA DRPR Total: 2 associations

transparency, is directly mentioned in 5 codes. Next two terms are part of 4 codes: competing employers/client and improper influence. Two codes hold a term “use of power”, and in one code are the terms “contradictory positions” and “threats”. The same number of terms (7) can be put into the category of financial transparency. The term “financial interest” is directly mentioned in 5 codes. The terms “gifts/presents/favors” and “tie-in transactions” are part of 4 codes. “Third parties” and “corruption” are mentioned in 3 codes. Finally, “kickbacks” and “surreptitious advertising” are present in 2 codes. Approximately, among codes, there are slightly more uses of non-financial conflict of interests terms, then financial transparency terms.

In second research question, this research sought to verify whether in ethical codes the concepts connected to transparency would show relevance in relation to the membership characteristics in associations which are supporting the specific ethic code (Table 3). It has been shown that the codes supported by associations which are gathering individual membership are more dedicated to the terms that belong to both categories of the principle of transparency, than the codes which are gathering corporative or mixed membership. For example, the codes supported by associations with corporative membership do not mention next terms from the category of conflict of interest: “improper influence”, “use of power”, “contradictory positions” or “threats”. In the category of financial transparency the majority

Table 3. Transparency according to the membership type of associations.

Type of association	Conflict of interest (non-financial)	Number of codes	Financial transparency	Number of codes
Code of association with individual membership Total: 4 associations	Conflict of interests	4	1) Financial interest	3
	Transparency	2	2) Gifts, presents, and favours	3
	Competing employers/clients	2	3) Tie-in transactions	2
	Improper influence	2	4) Third parties	1
	Use of power	1	5) Corruption	2
	Contradictory positions	0	6) Kickbacks	1
	Threats	0	7) Surreptitious advertising	0
Code of association with mixed membership Total: 4 associations	Conflict of interests	4	1) Financial interest	1
	Transparency	2	2) Gifts, presents, and favours	3
	Competing employers/clients	1	3) Tie-in transactions	1
	Improper influence	2	4) Third parties	0
	Use of power	1	5) Corruption	0
	Contradictory positions	1	6) Kickbacks	0
	Threats	1	7) Surreptitious advertising	2
Code of association with corporative membership Total: 5 associations	Conflict of interests	4	1) Financial interest	1
	Transparency	1	2) Gifts, presents, and favours	0
	Competing employers/clients	1	3) Tie-in transactions	1
	Improper influence	0	4) Third parties	2
	Use of power	0	5) Corruption	1
	Contradictory positions	0	6) Kickbacks	1
	Threats	0	7) Surreptitious advertising	0

of codes from the same group do not mention the majority of the terms from that category. In the middle of usage are codes of associations with mixed membership.

The third research question has shown that there are differences, given the character of the associations (national or international), international associations far less elaborate on issues of transparency of interest than national associations (Table 4). GA uses the term conflict in general sense, which can be applied to conflict of interests, and ICCO mentions the term “conflicting interest”.

When research findings are applied to the fourth research question (How transparency is experienced in the association’s codes with regard to “geographic position” within the West?), on the average, only slightly less elaborate concepts of transparency of interest have codes from the United Kingdom and the United States (Table 5). So the criterion of geographic milieu did not prove relevant.

However, during the research, it was especially interesting to note that an “ethical triangle” made from three vertices “PRs – client/employer – public” in the analysis of the codes “split” at the part of “representation of clients and transparency”. In this area, the codes have introduced a criterion, which is in ethical sense doubtful, and might be pronounced through a question: Can client’s ethos substitute the ethics of PRs?

Before we come deeper in this issue, it is necessary to explain that there are three concepts/terms in the analysed codes related to “representation of clients and transparency”, which most often

Table 4. Transparency according to the type of associations.

National associations	Number of different terms	International associations	Number of different terms
Austria PRVA	5	GA	1
Croatia CPRA	9	ICCO	1
Germany DRPR	8		
Italy FERPI	7		
Italy ASSOREL	2		
UK CIPR	3		
UK PRCA	3		
Spain DIRCOM	2		
Spain ADECEC	2		
USA PRSA	5		
USA PR COUNCIL	5		

Table 5. Transparency according to the country of establishment.

Europe	Number of different terms	USA and UK	Number of different terms
Austria PRVA	5	USA PRSA	5
Croatia CPRA	9	USA PR COUNCIL	5
Germany DRPR	8	UK CIPR	3
Italy FERPI	7	UK PRCA	3
Italy ASSOREL	2		
Spain DIRCOM	2		
Spain ADECEC	2		

refer to “clients with conflicting interests”. Those terms are part of the codes of 5 associations (PRSA, PR-COUNCIL, ICCO, CPRA, and ASSOREL). Next term is “competing employers / clients” – present in 4 associations (CPRA, DRPR, PRSA, and ASSOREL), and the third term is “contradictory positions”, which is mentioned only in one code (DRPR). The question of “representation of clients and transparency” does not treat only three associations: PRCA, DIRCOM, and GA.

Common to all analysed codes that deal with this issue is that the conflict of interest is at the end resolved by – the client. This means that if there is doubt in existing the conflict of interest, and after the client is informed about it and if the client has no objection, the PR expert can take over the job.

Here are some examples of these ethical doubts, taken from the ethic codes.

Austrian PRVA in its code suggests that PRs, before they take new client, should check whether exists a conflict of interest with an existing mandate. “In case of doubt, a clarification is made with the existing client and the potential client as to whether the mandate can be accepted”. Croatian CPRA obligates its members “to disclose to the employer, client, or potential client any financial or other interest in the business relationship with the supplier, associate or another client”. The same code gives an example of inappropriate practices if “the member does not point to the personal financial interest that exists with the competitor of the employer or the client”. And furthermore, it is against ethics if “a member represents a competitive company or a conflict of interest without the prior notice of the client or employer”.

Furthermore, German DRPR in its code admits that “public relations professionals operate within complex and often controversial networks of interests”, announcing that “they may, therefore, face conflicts of interest during their daily work or when accepting a mandate, for example when two contradictory positions or competing employers or clients are to be represented”. The solution is: “The acceptance of such mandates is only permissible if this course of action is agreed on with the employers or clients”.

Also, the Italian FERPI members “cannot take up positions or carry out activities that involve a conflict of interest without the explicit consent of the client or employer concerned”. On the same wave is Italian ASSOREL by claiming that “competing positions Public Relations agencies can work with clients or competing interests, but all parties involved must be informed before the start of activities”.

USA’s PRSA also in its code obligates to “disclose promptly any existing or potential conflict of interest to affected clients or organizations” and to “encourage clients and customers to determine if a conflict exists after notifying all affected parties”. The same code gives few examples of inappropriate acting, if “the member fails to disclose that he or she has a strong financial interest in a client’s chief competitor” or if “the member represents a ‘competitor company’ or a ‘conflicting interest’ without informing a prospective client”. USA’s PR Council in its code states: “Members reserve the option to represent more than one client in an industry sector, but any apparent conflicts must be vetted with relevant clients”.

International ICCO-code is directly stating: “Consultancies may represent clients with conflicting interests. Work may not commence for a new and conflicting interest without the current client first being offered the opportunity to exercise the rights under any contract between the client and consultancy”. Spanish ADECEC in its code looks at the question optionally: “The associated companies and their managers can inform the client of the possession of shares and financial interests in companies of their competence”.

CONCLUSION

This study focused on the use of the concept of transparency of 13 ethics codes that concern 18 public relations associations in the West. The analysis has shown that the concept of transparency in the ethics of public relations practitioners, associations, agencies, and institutions is far wider than the notion of conflict of interest.

The content analysis found 14 terms related to transparency, divided into categories of conflict of interest and financial transparency. Furthermore, research has shown that the character of membership in associations is to be taken into account in the analysis of ethical codes, what became significant also in analyses of ethics as a strategy of PR-associations or education as the essential part of the codes [15, 16]. To answer the question of why the codes that are signed by “corporate membership” in relation to “individually” or “mixed” membership are largely different invites additional research.

Research has shown that, in contrast to geographical differences that have not proved to be significant, there are significant differences in the use of concepts when it comes to the national and international character of associations. Since the latter use a far smaller number of concepts related to transparency, it can be argued that international associations are letting national associations deal with these issues.

However, during the research, it became apparent that in codes the issue of conflicts of interest in relation to the client is unanimously solved in the following way: PRs inform clients about the possible existence of the conflict and then the client decides whether or not to cooperate. If the problem is solved, are negotiations on this ethical problem necessary at all? However, Kim and Ki’s conclusion maybe helps to invite further discussions [6; p.251]:

“If we simply stress the complicated nature of the public relations profession and argue the impracticality of applying the universal approach to codes of ethics in public relations practice, professional codes of ethics cannot then provide necessary normative direction for the profession. Therefore, we argue that prohibition of conflicts of interests of competing clients should be the universal value for enhancing public relations professionalism, as we cannot assume that one public relations agency, which by nature is client-driven, can serve multiple competing clients sincerely and professionally at the same time”.

This study has its limitations, especially concerning the sample limited to the West. The challenge for further researches is to find out possible differences among associations and codes really so big that it is necessary to create new, universal ethic code for public relations. Negotiations for the re-examination of ethic codes and the concepts scholars have already begun to provide [6, 17].

APPENDIX

Table 6. Sources of used codes (continued on p.427).

Association Name	Full Name of Code	Source
PRVA	Code of Conduct of the Austrian Public Relations Association	https://prva.at/itrfile/_1_/d4d06c40110d731e9b73df17cddf9c00/20170323_Ehrenkodex%20des%20PRVA.pdf , accessed 19 th September 2017
CPRA	Croatian Public Relations Association Code of Ethics	http://www.huoj.hr/files/File/Eticki_kodeks_HUOJ_final.pdf , accessed 19 th September 2017

Table 6. Sources of used codes (continuation from p.426).

Association Name	Full Name of Code	Source
DRPR	The German Communication Code	http://drpr-online.de/wp-content/uploads/2015/11/German_Communication_Code.pdf , accessed 3 rd March 2017
FERPI	Italian Public Relations Federation Code of Professional Conduct	http://www.ferpi.it/associazione/statuto-regolamento-e-codici/codici/codice-di-comportamento-professionale-della-ferpi , accessed 19 th September 2017
Assorel	Professional Principles and Codes of Conduct for Public Relations in Italy	https://www.assorel.it/relazioni-pubbliche/assorel-rp-0002156.html , accessed 20 th March 2017
PRCA	PRCA Professional Charter	https://www.prca.org.uk/sites/default/files/downloads/PRCA%20Code%20of%20Conduct%20-%20updated%20following%20review%20in%20September%202016.pdf , accessed 19 th September 2017
CIPR	Chartered Institute of Public Relations Code of Conduct	https://www.cipr.co.uk/sites/default/files/Appendix%20A%20-%20Code%20of%20Conduct%20-%20Updated%20June%202012.pdf , accessed 19 th September 2017
Dircom	Association of Communication Managers Code of Ethics	http://www.dircom.org/sobre-dircom/codigo-etico , accessed 21 st March 2017
ADECEC	Association of Communication and Public Relations Consultancy Companies Code of Ethics	http://www.adecec.com/quienes_somos/codigo_etico.php , accessed 22 nd March 2017
PRSA	PRSA Code of Ethics	https://www.prsa.org/ethics/code-of-ethics , accessed 19 th September 2017
PR Council	The PR Council Code of Ethics and Principles	http://prcouncil.net/join/the-pr-council-code-of-ethics-and-principles , accessed 19 th September 2017
GA	Global Protocol on Ethics in Public Relations	https://static1.squarespace.com/static/561d0274e4b0601b7c814ca9/t/56c202bcc2ea510748cb2171/145555260837/GA_Global_Ethics_Protocol.pdf , accessed 19 th September 2017
ICCO	The ICCO Stockholm Charter	https://iccopr.com/wp-content/uploads/2015/01/StockholmCharter.pdf , accessed 11 th July 2017

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