ISO 9001:2026 ETHICS WORKSHOP

200 Negative Ethics Actions in Business

Including psychological, SEC, and product design ethics failures

13 categories | 200 actions | Supports ISO 9001:2026 quality culture and ethical behavior (5.1.1, 7.1.4, 7.3) | Training reference document

This document lists 200 negative ethics actions observed in business environments, organized into 13 categories. Categories 1-10 cover operational and governance ethics. Category 11 covers subtle psychological behaviors. Category 12 covers SEC-prohibited actions. Category 13 covers ethical failures in product design and development.

Use this resource for: case study discussion, gap analysis against ISO 9001:2026 Clauses 5.1.1, 7.1.4 and 7.3, internal audit question design, corrective action practice under Clause 10.2, or leadership culture conversations.

Scope note: Ethics is ethics, whatever the standard. ISO 9001:2026 is one place ethical behavior has to show, not the boundary of it. Categories 1, 8, 10, 11 and 13 are the ones a quality management system audit is most likely to test directly. Categories 2 to 7 and 12 sit largely outside the QMS, but misconduct in any of them carries the same consequences if discovered. For a certified organization it carries a second one: doubt about whether the certificate can still be trusted.

If any of these is discovered: open a corrective action. Every time.

The boldest thing an organization can do when any action on this list comes to light is to put it through its corrective action system under ISO 9001:2026 Clause 10.2. Not a quiet conversation, not an HR file no one else sees, and not a hope that it fades. A logged corrective action, with a cause, an owner and a follow-up.

However it is found. The trigger is the same whether the behavior surfaces at an internal audit, in a customer complaint, through an employee concern or supplier report, in a regulator's inquiry, or in a news story. Internal audit is the best place to find it, because the organization finds it first. Public discovery is the hardest, and it is exactly when a corrective action record matters most: it shows the system responded the way it was designed to, rather than the way a public relations plan would prefer.

Why the process fits. Clause 10.2.1 asks the organization to react and correct, deal with the consequences, determine the causes, check whether similar nonconformities exist or could occur elsewhere, act, and review whether the action worked. Those steps fit an ethics failure as well as they fit a defective part. Where the behavior breaks a requirement of the quality management system, including the organization's own quality policy and the Clause 5.1.1 i) and 7.3 e) requirements, it is a nonconformity. Where it sits outside the system's scope, the same discipline can still be applied by choice.

Why it takes courage. A corrective action record names what happened, traces the cause, often to a target, an incentive or a leader's behavior, and stays on file for the next auditor to read. That is uncomfortable. It is also the strongest evidence of quality culture an organization can produce, because it proves the system tells the truth about itself even when the truth is unwelcome.

Use it anyway. Many organizations will be reluctant to put an ethics failure through their official corrective action program. It can feel like a private matter, the record is permanent, and the cause may lead back to someone senior. That reluctance is understandable, and it is exactly why using the program matters. Doing so demonstrates accountability: the organization holds itself to its own rules even when the finding is about its own conduct. That is what a positive culture of ethical behavior looks like in practice, shown in the record rather than stated in a policy.

Handle it with care. Several items are also legal matters. Run the corrective action alongside legal counsel, protect the identity of anyone who raised the concern, make sure the investigation never becomes retaliation, and meet any mandatory reporting obligations. Record facts and actions rather than speculation, and restrict access where confidentiality requires it.

Workshop use note

Some actions listed here constitute criminal offenses in many jurisdictions. This document is for training and awareness purposes only and does not constitute legal advice. Psychological harm actions may also give rise to claims under employment law, health and safety legislation, and human rights frameworks.

Note on Category 11

Subtle psychological ethics failures are particularly relevant to Clause 7.1.4 (Environment for the operation of processes) and Clause 5.1.1 (Leadership & Commitment) in ISO 9001:2026. They are distinguished by being hard to observe, hard to document, and often carried out with plausible deniability. This is precisely what makes them ethically serious and culturally destructive.

CATEGORY 1 LEADERSHIP & GOVERNANCE

Failures by senior management to model or uphold ethical standards

If discovered: *Open a corrective action even when the person responsible is senior, and assign it above them, to the board or an independent director, so the person being investigated cannot steer it.*

#	Negative Ethics Action
1	Setting financial targets that implicitly pressure staff to cut corners on quality or safety
2	Publicly endorsing ethical values while privately tolerating or rewarding unethical behavior
3	Failing to act on escalated ethics concerns, allowing them to fester or be buried
4	Creating a culture of fear where staff are punished for raising concerns
5	Awarding contracts to suppliers owned by family members or personal associates without disclosure
6	Using company resources (vehicles, travel, expenses) for personal benefit without authorization
7	Manipulating board reporting to conceal problems or underperformance from shareholders
8	Making significant decisions while in an undisclosed conflict of interest
9	Retaliating against whistleblowers through demotion, reassignment, or layoff
10	Accepting personal gifts or hospitality from suppliers in return for preferential treatment

11	Selectively sharing strategic information with favored insiders, excluding others equally entitled to it
12	Positioning oneself as a champion of inclusion while privately undermining diverse candidates for promotion

CATEGORY 2 CUSTOMER & CONSUMER RELATIONS

Actions that harm or deceive customers and end consumers

If discovered: *Correct the practice, deal with the consequences for the customers affected, including notification and remediation where appropriate, and check whether other products or channels carry the same practice.*

#	Negative Ethics Action
13	Making false or exaggerated claims in product marketing or advertising
14	Knowingly selling defective or substandard products without disclosure
15	Using hidden fees or charges that are not clearly communicated at point of sale
16	Designing contracts with terms that are deliberately difficult for customers to understand
17	Failing to disclose known product safety risks to customers in a timely manner
18	Using manipulative sales tactics that exploit vulnerable or elderly customers
19	Sharing customer data with third parties without explicit consent
20	Providing selective information to customers to steer them toward higher-margin products not in their best interest
21	Refusing to process legitimate refund or warranty claims without justification
22	Falsifying customer feedback, reviews, or testimonials to misrepresent product quality

CATEGORY 3 EMPLOYEE & WORKPLACE

Unethical treatment of employees and the working environment

If discovered: *Open a corrective action and run it with HR, protecting the people who raised the concern. Look for the cause in workload, targets or supervision, not only in one individual.*

#	Negative Ethics Action
23	Discriminating in hiring, promotion, or pay on the basis of gender, race, age, or disability
24	Tolerating or ignoring workplace bullying and harassment when reported
25	Paying employees below the legal minimum wage or withholding legally required benefits
26	Requiring employees to work excessive hours without appropriate compensation or rest
27	Misclassifying permanent employees as contractors to avoid employment rights obligations
28	Conducting surveillance of employees in ways that are invasive or disproportionate

29	Using non-disclosure agreements to silence employees who have experienced wrongdoing
30	Taking credit for an employee's work or ideas without acknowledgement
31	Failing to provide promised training, development, or career progression opportunities
32	Structuring layoffs to target employees who have raised concerns or complaints

CATEGORY 4 FINANCIAL & ACCOUNTING

Misrepresentation, fraud, and manipulation of financial information

If discovered: *Log the corrective action with finance leadership and legal counsel involved, and check whether the controls that should have caught it failed anywhere else.*

#	Negative Ethics Action
33	Inflating revenue figures by recording sales before they are confirmed or completed
34	Understating liabilities or provisions to make the balance sheet appear stronger than it is
35	Creating fictitious invoices or expenses to misappropriate funds
36	Using off-balance-sheet vehicles to conceal debt from investors and regulators
37	Paying or receiving bribes disguised as consulting fees or facilitation payments
38	Approving expense claims that do not meet policy criteria without challenge
39	Falsifying procurement records to justify awards to preferred suppliers
40	Engaging in insider trading using material non-public information
41	Structuring financial transactions to avoid legal reporting thresholds
42	Deliberately delaying supplier payments beyond agreed terms to manage cash flow at suppliers' expense

CATEGORY 5 SUPPLY CHAIN & PROCUREMENT

Ethical failures in how organizations source and manage their supply chains

If discovered: *Raise it against your own purchasing process as well as the supplier. Clause 10.2.1 b) asks whether similar nonconformities exist elsewhere, so check other suppliers and other buyers.*

#	Negative Ethics Action
43	Failing to conduct meaningful due diligence on suppliers' labor or environmental practices
44	Knowingly sourcing from suppliers that use child or forced labor
45	Applying extreme price pressure on suppliers in ways that force unsafe working conditions
46	Turning a blind eye to modern slavery risks identified in the supply chain
47	Accepting inferior or substituted materials from suppliers without proper testing or disclosure

48	Leaking competitor pricing information to a preferred supplier during a tender process
49	Splitting purchase orders to stay below approval thresholds and avoid oversight
50	Awarding contracts based on personal relationships rather than objective evaluation criteria
51	Failing to hold suppliers accountable for repeated quality failures to preserve a relationship
52	Using supplier audits as a check-the-box exercise without acting on findings

CATEGORY 6 ENVIRONMENTAL & SUSTAINABILITY

Actions that cause or conceal environmental harm

If discovered: *Open a corrective action and, where ISO 14001 is in place, run it through that system's Clause 10 as well. Check compliance obligations and any reporting duties.*

#	Negative Ethics Action
53	Falsifying environmental monitoring data or compliance reports submitted to regulators
54	Illegally disposing of hazardous waste to avoid licensed disposal costs
55	Making exaggerated or misleading environmental claims (greenwashing) about products or operations
56	Continuing to operate a process known to exceed legal emission limits without remediation
57	Concealing a significant environmental incident from regulators and local communities
58	Selling products marketed as sustainably sourced without adequate verification of the supply chain
59	Failing to disclose climate-related business risks to investors as required
60	Deliberately mislabeling the recyclability or environmental credentials of packaging
61	Lobbying against environmental regulations while publicly claiming to support sustainability
62	Using carbon offsets purchased from unverified or low-quality sources to claim net-zero status

CATEGORY 7 DATA, PRIVACY & TECHNOLOGY

Unethical use of data, digital systems, and personal information

If discovered: *Open a corrective action alongside any breach-response or notification process the law requires, and fix the design or access control that allowed it.*

#	Negative Ethics Action
63	Collecting personal data beyond what is necessary for a stated purpose without consent
64	Retaining customer data longer than policy or regulation permits

65	Selling or sharing personal data without adequate transparency or lawful basis
66	Failing to notify affected individuals of a data breach in a timely manner
67	Using algorithmic systems that produce discriminatory outcomes and failing to investigate or correct them
68	Designing digital interfaces (dark patterns) that manipulate users into unintended actions
69	Accessing employees' personal emails, messages, or accounts without authorization or legal basis
70	Using AI-generated content or deep fakes to misrepresent a person's words or actions
71	Deploying surveillance technologies on customers or employees without adequate disclosure
72	Acquiring competitor data through hacking, social engineering, or misuse of a former employee's knowledge

CATEGORY 8 QUALITY & PRODUCT INTEGRITY

Compromising the quality, safety, or integrity of products and services

If discovered: *This is the heart of Clause 10.2. Control the affected product, deal with the consequences for customers, and find why the system allowed it, not only who did it.*

#	Negative Ethics Action
73	Knowingly releasing a product with a known defect that poses a safety risk without recall or disclosure
74	Falsifying quality inspection records to meet contractual or regulatory requirements
75	Using cheaper or inferior materials than specified in contracts without customer knowledge
76	Approving production batches that fail quality criteria under commercial pressure
77	Backdating quality records to cover missed testing or inspection windows
78	Suppressing internal audit findings that would require costly process improvements
79	Failing to report a product safety incident to the relevant regulatory authority
80	Labeling products with false country-of-origin information to circumvent trade restrictions
81	Repackaging or relabeling out-of-date or returned goods for resale
82	Providing customers with misleading performance data or test results to win business

CATEGORY 9 REGULATORY & LEGAL COMPLIANCE

Deliberate or negligent failures to comply with laws and regulations

If discovered: *Open a corrective action, coordinate disclosure with legal counsel, and review how the obligation was missed so the same gap cannot recur.*

#	Negative Ethics Action
83	Operating without required licenses, certifications, or permits
84	Misrepresenting the organization's compliance status to regulators during inspections
85	Instructing employees to destroy or conceal documents relevant to a regulatory investigation
86	Failing to maintain legally required health and safety records
87	Ignoring enforcement notices or improvement orders from regulatory bodies
88	Deliberately misclassifying products to reduce tariff liability or meet regulatory thresholds
89	Submitting false information in grant applications or government-funded contract bids
90	Failing to report notifiable incidents as required by law
91	Using jurisdictional differences to conduct activities offshore that are illegal domestically
92	Coaching employees on what to say (or not say) to regulators prior to inspections

CATEGORY 10 CULTURE, COMMUNICATION & TRANSPARENCY

Failures in honesty, openness, and organizational integrity

If discovered: *Treat a cover-up or a silenced concern as a system failure. The corrective action should change how concerns travel upward, not just correct one message.*

#	Negative Ethics Action
93	Making public commitments to ethics or values that are known internally to not reflect reality
94	Selectively disclosing information to investors to manage share price or analyst expectations
95	Using deliberately vague or complex language in communications to obscure accountability
96	Holding double standards - applying policies strictly to junior staff while exempting senior leaders
97	Suppressing negative employee engagement or culture survey results rather than acting on them
98	Allowing a star performer to repeatedly behave unethically because of their commercial contribution
99	Blaming individual employees for systemic failures to deflect organizational accountability
100	Creating an atmosphere where ethics is treated as a compliance exercise rather than a genuine value
101	Failing to communicate the outcome of a reported ethics concern to the person who raised it
102	Publicly celebrating awards or certifications for ethics while concealing known internal problems

CATEGORY 11 SUBTLE PSYCHOLOGICAL & BEHAVIORAL

The hardest to detect and most corrosive ethics failures — deniable by design

If discovered: *These are hard to prove, so do not wait for proof to act. Open a corrective action on the pattern, protect the people who raised it, and look for the cause in leadership behavior and team conditions.*

The actions in this category are distinguished by their subtlety. Unlike overt misconduct, these behaviors are often carried out incrementally, individually deniable, and difficult to evidence. They cause significant harm to individuals and culture over time, and are increasingly recognized as a serious dimension of ethical risk in well-governed organizations.

Relevance to ISO 9001:2026: These behaviors directly undermine the ethical culture and psychosocial work environment requirements of Clauses 5.1.1, 7.1.4, and 7.3. A Note to Clause 5.1.1 says quality culture and ethical behavior are reflected in shared values, attitudes and practices, and these behaviors are where that shows first.

#	Negative Ethics Action
103	Gaslighting an employee by denying that a conversation, instruction, or incident occurred when it did
104	Persistently reframing an employee's legitimate complaint as a personal failing or overreaction
105	Downplaying the severity of a reported incident in front of the affected person to discourage further action
106	Using selective memory or vague recollection strategically to avoid accountability in performance reviews
107	Framing a coercive request as a choice while making clear that only one answer is acceptable
108	Using a person's personal vulnerability or insecurity - shared in confidence - as leverage in professional decisions
109	Applying pressure through implied consequences rather than explicit threats, so nothing can be proven
110	Presenting unfair decisions as the outcome of a fair process to prevent challenge
111	Deliberately excluding an employee from meetings, communications, or social events to signal disfavor
112	Engineering an employee's professional isolation by subtly undermining their relationships with colleagues
113	Giving an employee the 'silent treatment' following a complaint, resignation attempt, or act of independence
114	Assigning a targeted individual to tasks beneath their level as a form of quiet punishment
115	Consistently interrupting, talking over, or dismissing an employee's contributions in group settings
116	Providing excessively vague or delayed feedback designed to keep an employee uncertain and dependent
117	Setting employees up to fail by withholding resources, information, or support needed to succeed

118	Giving credit publicly for group work while privately attributing failures to specific individuals
119	Creating a culture of obligation where employees feel indebted to the organization for basic courtesies
120	Implying that work-life balance requests are a sign of insufficient commitment or team loyalty
121	Using past acts of support or sponsorship to emotionally oblige an employee to comply with requests
122	Normalizing self-sacrifice as a cultural virtue to discourage boundary-setting without explicit pressure
123	Performing visible concern for an employee's wellbeing in front of others while privately undermining them
124	Using the language of psychological safety or inclusion to co-opt and neutralize genuine dissent
125	Publicly praising an employee who raised a concern while privately ensuring their career stalls
126	Framing retaliation as management discretion - restructuring, changing scope, or reallocating work - so it cannot be identified as retaliation
127	Designing performance management processes that systematically erode employee confidence rather than support growth
128	Using probation or performance improvement plans disproportionately against employees who raise concerns
129	Fostering unhealthy internal competition that encourages employees to undermine rather than support each other
130	Creating ambiguity in roles, responsibilities, and expectations as a method of control rather than by oversight
131	Normalizing emotional volatility in leadership so that employees manage the leader's mood rather than their own work
132	Cultivating dependency by being the sole source of information, access, or approval for key decisions

CATEGORY 12 SEC-PROHIBITED BEHAVIORS

Violations of US securities law enforced by the Securities and Exchange Commission

If discovered: *These are legal matters first. Open the corrective action under legal counsel's direction, preserve records, and never let internal handling delay required reporting or disadvantage a whistleblower.*

Category 12 covers behaviors explicitly prohibited under US federal securities law and actively enforced by the SEC. These apply primarily to public companies, their officers and directors, broker-dealers, investment advisers, and anyone who trades in or advises on US-listed securities. In fiscal year 2025, the SEC filed 456 enforcement actions and received a record 53,753 tips, complaints and referrals. Many of these behaviors also constitute criminal offenses prosecuted by the Department of Justice.

Key legislation: Securities Act of 1933, Securities Exchange Act of 1934, Sarbanes-Oxley Act 2002 (SOX), Dodd-Frank Act 2010, Investment Advisers Act 1940. Relevant rules include SEC Rule 10b-5, Rule 21F-17 (whistleblower protection), the SEC Marketing Rule, and Regulation FD (fair disclosure).

#	Negative Ethics Action
133	Trading in company securities while in possession of material non-public information (classic insider trading)
134	Tipping a friend, family member, or colleague with material non-public information that enables them to trade
135	Trading ahead of a known merger, acquisition, or earnings announcement using information not yet disclosed to the market
136	Using information obtained in a professional role (lawyer, auditor, banker) to trade in a client's securities
137	Trading in a competitor's or supplier's stock based on material non-public information learned through business dealings
138	Filing materially false or misleading statements in annual reports (Form 10-K), quarterly reports (Form 10-Q), or proxy statements
139	Omitting material information from SEC filings that a reasonable investor would consider important to an investment decision
140	Prematurely recognizing revenue to inflate reported earnings before results are legitimately earned
141	Failing to disclose related-party transactions between the company and its executives, directors, or their families
142	Certifying financial statements as accurate under Sarbanes-Oxley Section 302 or 906 when known to be false
143	Engaging in 'pump and dump' schemes — artificially inflating a stock price through false statements then selling before the price collapses
144	Wash trading: buying and selling the same securities simultaneously to create artificial trading volume and the appearance of market activity
145	Spreading false or misleading information about a company on social media, forums, or in press releases to move its share price
146	Front-running client orders — trading in advance of a large customer order that will predictably move the market price
147	Engaging in 'spoofing' — placing large orders with no intention of executing them to mislead other market participants about supply or demand
148	Offering or selling unregistered securities to the public without a valid exemption from SEC registration requirements
149	Making materially false or misleading statements in a securities offering prospectus or registration statement
150	Running a Ponzi scheme — paying returns to early investors using new investor funds rather than actual business profits
151	Conducting an initial coin offering (ICO) or token sale that meets the definition of a securities offering without registration

152	Misrepresenting the use of proceeds from a securities offering to investors
153	Churning a client account — executing excessive trades primarily to generate commissions rather than serve the client's interests
154	Recommending investments that are unsuitable for a client's risk profile, investment objectives, or financial situation
155	Failing to disclose material conflicts of interest to advisory clients, including compensation arrangements from third parties
156	Misappropriating client funds or securities — taking assets entrusted by clients for personal use
157	Violating the SEC Marketing Rule by advertising hypothetical or misleading performance figures to prospective clients
158	Using personal email, WhatsApp, Signal, or other off-channel messaging platforms for business communications to avoid regulatory recordkeeping
159	Destroying, altering, or concealing records that are subject to an SEC subpoena or investigation
160	Failing to maintain required books and records as mandated under the Securities Exchange Act for broker-dealers or advisers
161	Backdating trade confirmations, account documents, or compliance records to misrepresent the timing of transactions
162	Failing to file required beneficial ownership disclosures (Schedule 13D/13G or Form 4) when crossing mandatory reporting thresholds
163	Requiring employees or clients to sign agreements that waive their right to report potential violations to the SEC
164	Including confidentiality clauses in settlement or severance agreements that impede an individual's ability to contact the SEC
165	Retaliating against an employee who has reported suspected securities law violations to the SEC or internally
166	Coaching employees on what not to say during an SEC examination or investigation
167	Failing to establish, maintain, or enforce a compliance program adequate to prevent and detect securities law violations

Note on international applicability

SEC rules apply to any company with US-listed securities, any person trading in US markets, and increasingly to non-US firms with US investor exposure. Non-US organizations working with ISO 9001:2026 should be aware that equivalent prohibited behaviors exist under the EU Market Abuse Regulation (MAR), the UK Financial Services and Markets Act (FSMA), and other national securities frameworks. The underlying ethical principles are universal even where the specific regulatory regime differs.

CATEGORY 13 PRODUCT DESIGN ETHICS

Ethical failures that occur during the design and development of products and services

If discovered: *Trace it back through design and development reviews: which review should have caught it, and what will change so the next one does.*

Category 13 covers ethical failures that occur during the design and development phase — before a product reaches the customer. These are distinct from product integrity failures (Category 8), which relate to what happens during production and delivery. Design-stage ethics failures are particularly serious because they are often locked in before any corrective action is possible, and their consequences can affect many people at scale.

Relevance to ISO 9001:2026: Product design ethics intersects with Clauses 8.3 (Design and Development), 8.1 (Operational Planning and Control), and the quality culture and ethical behavior provisions in Clauses 5.1.1 and 7.3. Many items also engage customer focus under Clause 5.1.2.

#	Negative Ethics Action
168	Knowingly proceeding with a product design that contains a foreseeable safety hazard without adequate mitigation or disclosure
169	Ignoring safety-critical findings from early-stage testing to avoid delays to a launch date or commercial milestone
170	Designing a product to meet the minimum legal safety threshold when known hazards could be mitigated further at reasonable cost
171	Omitting safety features from lower-price product variants that are standard in premium versions, without adequate consumer disclosure
172	Failing to conduct adequate risk assessment on a new product feature before release, particularly where vulnerable users may be affected
173	Intentionally designing products with shortened functional lifespans to accelerate replacement purchasing
174	Engineering software or firmware updates that degrade the performance of older hardware models to encourage upgrade
175	Using proprietary components or connectors to prevent third-party repair, making economical repair artificially impossible
176	Designing products to be difficult or costly to repair, in conflict with right-to-repair legislation or customer expectations
177	Using non-replaceable batteries or sealed units in products where this serves no functional purpose other than limiting repairability
178	Failing to consider the needs of disabled users during product design, resulting in exclusion from use without justification
179	Removing accessibility features between prototype and final product under cost pressure without assessing the impact on affected users
180	Designing user interfaces or packaging that are inaccessible to older or less digitally literate users without offering alternatives
181	Conducting user testing exclusively with able-bodied, young, or technically proficient participants when the product serves a broader population
182	Using small print, poor contrast, or complex language in product interfaces or instructions in ways that disadvantage vulnerable users
183	Designing products with non-recyclable mixed materials when recyclable alternatives exist

	at comparable cost and performance
184	Incorporating substances of concern (e.g. phthalates, PFAS, heavy metals) in product design when safer substitutes are available
185	Designing packaging that significantly exceeds what is needed to protect the product, generating unnecessary waste
186	Failing to design products for end-of-life disassembly, making material recovery or safe disposal unnecessarily difficult
187	Using energy-intensive components or processes in product design without evaluating lower-impact alternatives
188	Designing a product that collects user data beyond what is necessary for its stated function, without transparent disclosure
189	Building default settings that maximize data collection rather than minimizing it, requiring active opt-out by users
190	Embedding persuasive technology or addictive design patterns (infinite scroll, variable reward loops) without adequate user disclosure
191	Designing algorithmic features that produce discriminatory or biased outcomes without building in fairness testing or review
192	Releasing an AI-powered product feature without adequate testing for safety, accuracy, or potential for misuse
193	Designing product labeling that is technically accurate but structured to mislead consumers about key attributes (e.g. health, origin, environmental impact)
194	Using ingredient or material names that obscure the presence of substances consumers commonly wish to avoid
195	Marketing a product as suitable for a purpose (e.g. industrial, professional, medical) for which it has not been adequately tested or certified
196	Designing packaging or presentation to resemble trusted brands or products in ways that cause consumer confusion
197	Failing to clearly communicate known limitations, contraindications, or conditions of safe use in product documentation
198	Designing products specifically targeting children with features that exploit developmental vulnerabilities, such as in-app purchase mechanics, loot boxes, or engagement loops that exploit impulsivity or peer pressure
199	Intentionally designing products with technical barriers to interoperability or data portability that lock users into a proprietary ecosystem, limiting their ability to switch providers or exercise data rights
200	Failing to include diverse demographic groups — including different ages, genders, skin tones, or physical characteristics — in product testing, resulting in systematically degraded performance for underrepresented users

How to use this list in your workshop

Case study activity: Select 5-8 items from any category relevant to your sector. In groups, discuss which are most likely in your organization and what controls currently exist.

Gap analysis: For each category, ask - do we have systems that would prevent or detect this? Where are the gaps?

Audit preparation: Each item implies an audit question. Use them to build an internal audit checklist.

Category 11 discussion: Use the psychological behaviors list for a leadership team conversation about culture. Ask: could any of these be happening here without us knowing?

Category 12 discussion: For public companies or SEC-regulated entities, review each item against your compliance program. For others, discuss the equivalent national regulatory obligations.

Category 13 discussion: Walk through the design stage of your most recent product launch. Which of these risks were explicitly considered? Which were not?

Corrective action drill: Pick three items. For each, assume it was found first at an internal audit, then assume it was found in a news story. Walk it through your corrective action procedure step by step against Clause 10.2.1. Where does the process stall? Who would hesitate to open it, or to sign it off? Those hesitations are the gaps to close first, because a corrective action system that cannot handle an ethics finding will not be trusted with one.

From 200 to 5: Choose the five items most relevant to your organization and rewrite each as a positive, observable behavior with a way to observe it. Example: item 76 becomes "No batch that fails quality criteria is released, whatever the commercial pressure," observed through release records sampled at internal audit.

Aligned to ISO 9001:2026, published September 16, 2026. SEC figures from the SEC fiscal year 2025 enforcement results, announced April 7, 2026; check the latest annual results before presenting. For training purposes only - not legal advice.