

and adapted to the peculiarities of specific cases. They can be directed precisely at the wrong that needs righting—at racism in one country, at child labour in another, at unconscionable forestry or toxic mining operations in still another. They can predictably seize the attention of élites by threatening the loss of what is valued most, the gains of trade and investment. And from time to time they seem to have worked; the so-called Sullivan rules that ultimately guided many international companies in South Africa may have had some effect in ending apartheid.

Still, codes of conduct raise problems both for company managers and for society. Executives sometimes admit to a quandary: On one hand, they resist government-imposed codes that tie their hands in international business (especially if it means a competitive disadvantage); on the other hand, they hesitate to invent all-purpose codes of their own that might fail in specific cases or conflict with government policies. Corruption represents a particular problem for code-drafters; the stronger the code, experience suggests, the more ingeniously disguised will be a new arrangement for bribes. And there is always the “when-in-Rome” argument: A transaction that would be prosecuted as bribery in Canada might be regarded, with approval or not, as a customary commission in another country. Should companies operating abroad obey rules made in Ottawa (or Washington?), or in the place where the deal is done? As one answer, OECD governments for years have been negotiating an international code restraining corruption and bribery; the results so far are incomplete.