Markkula Center
for Applied Ethics
at Santa Clara University

COMMUNICATION ON ENGAGEMENT (COE)

Period covered by this Communication on Engagement
From: July 2021 to June 2024

Part I. Statement of Continued Support by the Chief Executive or Equivalent

June 18, 2024

To our stakeholders:

I am pleased to confirm that the Markkula Center for Applied Ethics at Santa Clara University reaffirms its support to the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labor, Environment, and Anti-Corruption. This is our Communication on Engagement with the United Nations Global Compact. We welcome feedback on its contents.
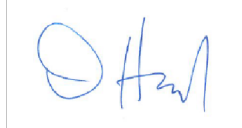
In this Communication of Engagement, we describe the actions that our organization has taken to support the UN Global Compact and its Principles as suggested for an organization like ours. As reported in 2021, we continue to experience a substantial increase in direct engagement with corporations, both those in the Global Compact and others. Due to the nature of the work we do, most of these engagements occur under nondisclosure agreements which prevent our ability to share the specifics. The growth in interest in technology and technology-related issues noted in our last report continues, and is reflected in the scope of our activities during this reporting period. Our ethics professionals have responded to this increase in demand for efforts to support ethical business practices by addressing the development of the responsible use of technology in all of our program areas, which has continued to heighten our interactions with the business sector across the Center's activities.

In addition to the work we do with companies, our engagement in more traditional aspects of higher education has also continued and grown. In this report, we include some of the work of the students who participate in various fellowships at the Center, in partnership with Center ethics professionals on staff.

Our work remains complementary and supportive of the UNGC's 10 core principles, addressing the critical issues of human rights, labor policy, environmental protection, and global corruption, among others. You can learn more about our center, it's mission and purpose on our website here. Our 2022-2023 Annual Report of our Center gives an up-to-date review of our major accomplishments. This can be accessed at: https://www.scu.edu/ethics/annual-report/

We are glad to provide any additional information on our work and provide counsel to others seeking to work in the same field. The Center's website is www.scu.edu/ethics and inquiries can be addressed to ethics@scu.edu.

Sincerely yours,

Don Heider, PhD
Executive Director

Part II. Description of Actions

Describe below the actions your organization has taken in support of the Global Compact. It is strongly recommended that the actions taken are related to one or more of the specific activities suggested.

- **Incorporate the GC principles into internal operations and communicate progress following the COP requirements (required):**

  The Center has reviewed its primary intellectual property, its [Framework for Ethical Decision Making,](#) and issued a significant revision during this reporting period. The revised framework is now available on the Center's website and through our updated materials. It incorporates a sixth lens, [Care Ethics](#), in addition to the original five lens, to provide a more comprehensive tool for decision making and better reflect global perspectives.

  In the past three years, the Center has continued to offer [Ethics Spotlights](#), providing in-depth analysis of ethical issues from a multi-disciplinary perspective, engaging the Center's staff and faculty scholars, and occasional guest contributors. Each of the spotlights touched on at least one of the 17 Sustainable Development Goals.

  The Center continues to adhere to guidelines outlined by the national Standards for Excellence programs, following best practices and procedures for nonprofits in the areas of mission, strategy, and evaluation; leadership, board, staff, and volunteers; legal compliance and ethics; finance and operations; resource development; and public awareness, engagement, and advocacy. These best practices align with and uphold the 10 Principles and ensure that the Center is promoting the Principles in its internal operations.

  Further, the Center has sustained its own commitment to anti-discrimination practices. During the 2023-2024 academic year, the center embarked on several initiatives in this area. One was an internal diversity analysis of the ethics councils associated with each of the Center's program areas. The other is an ongoing website content audit to ensure the materials presented on the Center's website are welcoming and inclusive of the global audience it reaches.

- **Promote the GC and its principles through one of the following activities**

  - **Deliver education on topics related to the Global Compact**:

    The Center hosted 14 programs in the reporting period focused on the ethical impact of AI, which relates to Principles 1, 2, 3, 6, 7, 8, and 9. Several of these had overlapping themes related to human rights, labor, or the environment, such as "Being Human at the Age of AI" and "What do Jesuit Values have to do with tech companies?"

    We continued programs about democracy, free speech, and civil discourse, relating to Principles 1, 2, and 6; such as, "Ethics and Misinformation" and, "How Might Journalism Help Democracy" and, "Amanda Ripley: High Conflict," and touched on anti-discrimination, in support of Principle 6, with programs like, "Ethical Storytelling."

    Ann Skeet, Markkula Center senior director of leadership ethics, facilitated sessions on ethics in two on-going programs training people to serve on corporate boards, through the Silicon Valley Executive Center's Women's Corporate Board Readiness and Black Corporate Board Readiness, both aimed at developing and training a diverse pool of candidates to serve on corporate boards. Her sessions in these programs touch on materials in support of Principles 1, 2, 6, 7, 8, and10 with an emphasis on corporate ethics and compliance programs.

Together with Dr. Brian Green, Markkula Center director of technology ethics, Skeet presented on the topic of AI Ethics to two corporate boards of global companies, in September and October 2023. They also presented, "Ethics in the Age of Disruptive Technologies" to Amici Lovaniensis, affiliates of KU Leuven, a university in Belgium, in October 2023.

Dr. Green also presented "A Framework for Ethical Decision Making," to the board of the Metropolitan Water District of Southern California in June 2023.

Dr. Green teaches AI ethics in the University's Graduate School of Engineering, where he touches on matters of labor, sustainability and the environment, and anti-corruption.

Dr. David DeCosse, Markkula Center director of Catholic and religious ethics, covers human rights in the three courses he teaches for the University's religious studies department: Ethics of War and Peace, Christianity and Politics, and Conscience, Christianity, and Politics.

Irina Raicu, Markkula Center director of internet ethics, presented on topics touching on human rights to the following organizations:

- A virtual presentation, "AI and Public Policy," to League of Women Voters Silicon Valley chapter, on AI and elections, panelist, February 2024
- Presentation on "International Human Rights Issues arising from Data Localization," at a conference titled "Data Sovereignty and Data Localization: Navigating the Legal Landscape in High Technology and International Law," Santa Clara University School of Law, panelist, February 2024
- Presentation on "Emergence of Artificial Intelligence: New Innovation, New Challenges," as part of AI Virtual Town Hall with State Senator Bill Dodd, panelist, March 2023
- Presentation on "Can Biased Humans Design Unbiased Algorithms?" as part of Tech Ethics Symposium at Duquesne University, October 2022 related blog post: https://www.scu.edu/ethics/internet-ethics-blog/on-biased-humans-and-algorithms/
- Virtual presentation, "Promotion of an ethical approach into organizations." As part of the Global Privacy Assembly, panelist, October 2021. (The Global Privacy Assembly has been the "global forum for data protection and privacy authorities for more than four decades… [providing] leadership at an international level in data protection and privacy… by connecting the efforts of more than 130 data protection and privacy authorities from across the globe.")

Irina Raicu also organized a full day public conference on "The Character of AI," which covered human rights issues as part of Santa Clara University's Summer Institute in Technology Ethics, July 2022: https://www.scu.edu/ethics/events/the-character-of-ai--a-technology-ethics-conference/

Raicu has developed cases that touch on matters of human rights and are available on the Markkula Center website:
Case study: https://www.scu.edu/ethics/focus-areas/internet-ethics/resources/automation-and-accountability-an-ethics-case-study/
Case study: https://www.scu.edu/ethics/focus-areas/internet-ethics/resources/crisis-data-an-ethics-case-study/
Case study: https://www.scu.edu/ethics/focus-areas/internet-ethics/resources/emotion-recognition-and-smart-cities/

Raicu presented on the environment to the following organizations:

- Presentation as part of American Bar Association workshop series sponsored by the ABA Section of Environment, Energy, and Resources: https://www.americanbar.org/events-cle/ecd/ondemand/440164218/, May 2024
- Presentation on AI's environmental impact as part of the State Legislative Leaders Foundation's Spring meeting, April 2024

Raicu presented on labor to the following organizations:

- Presentation on "Fundraising Meets the Future: Exploring AI's Ethical Implications" as part of the "Funding Your Impact Summit" Silicon Valley Council of Nonprofits (SVCN), panelist, May 2023
- Presentation on "Life and Work after ChatGPT: New Opportunities and Ethical Challenges from Generative AI," as part of Annual Ethics & Responsible Business Forum organized by California State University, Monterey Bay, panelist, April 2023
- Virtual presentation on "Management for Ethical AI: The State of the Art" organized by The Ohio State University Moritz College of Law, panelist, October 2022

Subramaniam (Subbu) Vincent, Markkula Center director of journalism and media ethics, did work in human rights in the following programs:

- "Ethics Training for Journalists and Open-Source Analysts," in Seoul, Korea, March 2024
- A training for 45 community news publishers, "Understanding the Ethics of Political Ads," through the Center for Community Media, Craig Newmark School of Journalism, CUNY, February 2024
- "Reinventing Journalism to Strengthen Democracy," at KALW 91.7 FM, February 2024, https://www.kalw.org/2024-02-13/town-hall-reinventing-journalism-to-strengthen-democracy
- "Ethics of Coverage of Mass Shootings," a talk for the National dialogues on Behavioral Healthy, New Orleans, October 2023
- "How Journalism Helps Democracy," a talk at Santa Clara University, October 2021

Vincent spoke on anti-corruption on a panel, "Investigative Newsrooms and Forensic Online Hoaxes," with Julia Angwin and Apar Gupta, at the Markkula Center for Applied Ethics, December 2022 https://www.youtube.com/watch?v=vWWSDoTHVPs

Ann Skeet spoke on labor in a guest lecture, "A Practice of Ethical Leadership and Ethical Culture," Santa Clara University, March 2024.

One additional way the Markkula Center provides education on topics related to the Global Compact is through work directly with students on Santa Clara University's campus through internships and fellowships. Some examples of the student work in areas of the Global Compact are shared here:

Hackworth Fellow Tatum Diemer (2023-2024), working with Ann Skeet, did his project on how to lead organizations to implement sustainability policies. He wrote an extensive case study, "Organizational Culture and its Role in Fostering Policy Development: A Focus on Sustainability Policy at SCU."

Hackworth Fellow Yuvraj Rao (2022-2023), working with Dr. David DeCosse, prepared a business ethics case on child labor, "IKEA Case: One Company's Fight to End Child Labor."

Hackworth Fellow Sydney Lenoch (2022), working with Subbu Vincent did her project on free speech and human behavior around dignity, forgiveness, and power. https://www.scu.edu/ethics/focus-areas/journalism-and-media-ethics/resources/the-wolf-that-cried-cancel-culture/

Hackworth Fellow Courtney Davis (2021) working with Subbu Vincent, did her project on social media and content moderation, "Why 'Dangerous Individuals and Organizations' Policies are not Enough"

Students working with Dr. David DeCosse during the time period covered by this report have done substantial projects on housing as a human right; on the rights of indigenous persons who are unhoused in the United States; and on the kinds of moral reasoning that foster respect for the rights of unhoused persons. Students also have worked on a major project focused on the rights of persons in the time of climate change to live in safety behind the vast and vulnerable network of levees throughout the United States.

Dr. Brian Green works with Environmental Fellows at the Markkula Center each year. Here is a sampling of their contributions, represented on our website during the reporting period:

- A Brief Introduction to Climate Engineering
  Is climate engineering a viable and ethical solution to slowing climate change?

- An Ethical Evaluation of Stratospheric Aerosol Injection
  Perspective on technical and ethical questions that arise from exploring and using stratospheric aerosol injection to mitigate climate change.

- Is Climate Engineering Viable? And if it's Viable, is it Ethical?
  Shivani Dharanipragada '25 learned about technological innovations in geoengineering and explored their ethical and legal implications.

- The Colorado River and Environmental Justice for the Navajo Tribe
  In water rights discussions, there is an ethical responsibility to include Indigenous people in both conversations and legislation decisions.

- On the Pressing Issue of Space Debris
  Space debris poses an imminent threat to space exploration and there are actions needed to mitigate the impact of this problem and its disastrous consequences.

- Climate Change, Water Insecurity, and Gender Inequality in Uganda
  Solutions to water insecurity and gender inequality challenged faced in Uganda require training, resource diversification, and climate-resistant infrastructure.

- An Ethical Study of the Impact of Water Insecurity on Identity in Indigenous Communities
  Decades of overuse and climate change have exacerbated droughts and water shortages around the world, and Indigenous groups are disproportionately feeling the resulting effects of water insecurity.

- The Responsibility of Corporations to Mitigate Water Pollution
  Improper dumping and waste disposal from corporations impacts the availability and quality of the water supply in the United States – these companies have an ethical responsibility to address these shortcomings in this area.

- **Expanding ESG: What does it mean for the Earth to belong to everyone?**
  Can ESG move past ingrained notions of property and capitalism and aid in the movement toward a more equitable, ethical, and sustainable future?

- **Evaluating the "E" in ESG:**
  Defining Positive Environmental Behaviors in Business
  ESG provides businesses with an opportunity to emphasize accountability and shift from a shareholder to a stakeholder model of business ownership

- **Conduct applied research and thought leadership in relation to the Global Compact**:

  The Markkula Center convened a group of distinguished experts to discuss the implications and challenges of AI regulations with the Honorable Ro Khanna in March 2024. The roundtable discussion was moderated by Ann Skeet.

  Dr. Brian Green is working group member of the World Economic Forum's AI Governance Alliance, Resilient Governance and Regulation. His working group published a report, "Generative AI Governance: Shaping a Global Collective Future" in January 2024.

  In December 2023, the Center released it's report "Ethics in the Age of AI," outlining how Americans feel about artificial intelligence from an ethical standpoint. The data was derived from a survey of 3,000 respondents age 18 and older, commissioned by the Markkula Center and its Institute for Technology, Ethics, and Culture.

  In June 2023 the Markkula Center published Ethics in the Age of Disruptive Technologies: An Operational Roadmap. Two of the three co-authors, Brian Green and Ann Skeet, are on the Markkula Center staff. The book details how organizations can integrate ethics into the responsible development of technology, and touches on matters of human rights, labor, and the environment. Of particular relevance are the principles outlined in the book. The book drew on research conducted in collaboration with the World Economic Forum, on the experiences of Markkula Center staff consulting directly to companies, and on primary research Skeet conducted about how ethics becomes pervasive in organizations.

  In December 2023, Brian Green and David DeCosse, both of the Markkula Center staff, were among the contributing authors of *Encountering AI: Ethical and Anthropological Investigations,* an exploration of AI that touched on matters of human rights and labor.

  Various Center staff have published and provided media commentary on the environment, human rights, labor, and anti-corruption. Here are some examples:

  Environment
  - Irina Raicu's op-ed on the impact of AI on the environment:
    https://www.sfchronicle.com/opinion/openforum/article/ai-chatgpt-climate-environment-18282910.php
  - Raicu's blog post on this topic:
    https://www.scu.edu/ethics/internet-ethics-blog/on-ai-ethics-and-the-environment/
  - Raicu's blog post on the metaverse and the environment:
    https://www.scu.edu/ethics/internet-ethics-blog/attention-must-be-paid/
  - Subbu Vincent spoke to Brazilian TV about how the media can avoid greenwashing for companies substantially implicated in climate change:

https://www.youtube.com/watch?v=SN8iokctj-Q&list=PLa0kMVkKliBvFLbRBc4JDByyIryJFpdcP&index=10&t=246s

- Ann Skeet spoke to CNBC's Sam Meredith about the impact of AI on the environment, November 2023:
- https://www.cnbc.com/video/2023/12/06/ai-and-big-tech-could-make-the-water-crisis-worse.html.
- Ann Skeet spoke to Dan Patterson of ZDNET about the impact of AI on the environment, September 2023: https://news.danpatterson.com/p/generative-ai-environmental-impact
- Ann was quoted in *PC Mag*, September 2023: "Big Tech Had a Water Problem Long Before ChatGPT"

Human Rights

- Irina Raicu and Jonathan Kwan, a former Markkula Center staff member, wrote an article about human rights and ethics:https://www.scu.edu/ethics/focus-areas/internet-ethics/resources/when-its-about-powerjusticehuman-rights-it-is-about-ethics/
- Irina Raicu and Santa Clara law professor Michele Oberman wrote an op-ed on the implications of the Dobbs ruling on teenagers and their mental health: https://slate.com/technology/2022/06/the-youth-mental-health-crisis-and-the-end-of-roe.html
- Raicu wrote a brief blog post on the same topic: https://www.scu.edu/ethics/internet-ethics-blog/on-teens-mental-health-and-reproductive-rights/
- Raicu's blog post about the use of social media as a tool of human rights in Afghanistan: https://www.scu.edu/ethics/internet-ethics-blog/social-media-in-afghanistan/
- Raicu's blog post about the limitations of using algorithms to predict human behavior: https://www.scu.edu/ethics/internet-ethics-blog/pride-prejudice-and-predictions-about-people/
- Dr. Brian Green wrote an op-ed for *TDWI*, November 2023, "Should AI Require Societal Informed Consent?"

Labor

- David DeCosse and Ann Skeet wrote an op-ed for *Marketwatch,* September 2023, "Religion is Mixing with Business and Raising Workplace Questions for Employers"
- Irina Raicu was quoted on the use of human labor behind AI in *Scientific American,* April 2024*:* "A Brief History of Automations that Were Actually People"
- Ann Skeet was quoted in an article about the privacy rights of employees in *Bloomberg,* March 2024: Stressed at Work? Your Office Phone Booth Could Tell Your Boss
- Ann Skeet was a guest on the *Leading Transformational Change with Tobias Sturesson* podcast, November 2023, discussing healthy corporate cultures, "Ann Skeet: Making Values Based Decisions in a Time of Rapid Change"

Anti-corruption

- Ann Skeet wrote an article that appeared in *Fortune*, November 2023, "OpenAI's board might have been dysfunctional—but they made the right choice. Their defeat shows that in the battle between AI profits and ethics, it's no contest"
- Ann Skeet was quoted in an article about companies that ignore concerns raised by employees in *Fortune,* February 2024: The recent debacles at Boeing and Meta highlight the dangers of shrugging off employee concerns

- • Ann Skeet was quoted on the FTC ban of the use of noncompete clauses in *The Washington Times,* June 2023*:* [Feds step onto states' legal turf to overrule employee noncompete agreements.](#)

- **Join and/or Propose partnership projects on corporate sustainability**

  The center maintains its participation in the Partnership on Artificial Intelligence to Benefit People and Society, where we have been a member since 2017 and several Markkula Center staff participate in the organization's working groups.

  The center has also continued to be active in the World Economic Forum's Centre for the 4th Industrial Revolution. Dr. Brian Green is a current member of the AI Governance Alliance. The steering committee for the Alliance includes members from Global Compact companies Bain and Company, Meta, Microsoft, Qualcomm, and Salesforce.

- **Engage companies in Global Compact-related issues**:

  The above programs, events, and research engage companies on the issues related to the 10 Global Compact Principles.

  Additionally, the Center has a business ethics internship program that connects Santa Clara University undergraduate students with experiential learning opportunities in Silicon Valley businesses, which helps to expose students to ethical dilemmas in the workplace. This helps create awareness of human and labor rights, corporate obligations to the environment and anti-corruption efforts in business early in their careers. Over the period covered by this report, interns have been placed at UNGC members Intel and Marvell and also at Adobe, KLA Tencor, and Cadence.

  The Markkula Center has continued to engage with companies one-on-one to help them with matters of ethics. This has included everything from training on using ethics in the development of new technologies and products, assessing culture to ensure labor rights are protected and to prevent workplace discrimination, joining or advising corporate ethics councils focused on tech ethics and anti-corruption, training professional services firms who in turn work with their clients to ensure ethics is used in decision making. Since our last report, we have counseled 24 organizations.

- **Join and/or support special initiatives and work streams**:

  As mentioned previously, we continue our membership in the Partnership on AI and our strategic partnership with the World Economic Forum's Centre for the 4th Industrial revolution.

  Additionally, we have collaborated on several initiatives with the Centre for Digital Culture of the Dicastery on Culture and Education of the Holy See. The centerpiece of our collaboration with the Vatican is the creation of the [Institute for Technology, Ethics, and Culture](#) (ITEC) at the Markkula Center. The Institute convenes leaders from business, civil society, academia, government, and all faith and belief traditions to promote deeper though on technology's impact on humanity.

  The Centre for Digital Culture at the Dicastery on Culture and Education of the Holy See has also convened several AI research groups and one of those groups published the book previously mentioned, *[Encountering AI: Ethical and Anthropological Investigations](#)*. Markkula Center staff David DeCosse, Brian Green, and Ann Skeet have each participated in these groups and DeCosse and Green contributed to the book. The most recent research groups are looking at AI and agency and AI and education.

Part III. Measurement of Outcomes

Please use the box below to include the most relevant qualitative and/or quantitative indicators to measure the outcome of the activities described in Part II above.

As noted, the Center reports regularly on its activities, including metrics, on its website. In addition to the annual report, we provide real time information about our work in the media through media mentions, press releases and Center newsletters. Here are a few salient metrics:

- 24 corporations hired the Markkula Center for Applied Ethics for ethics expertise during this 3-year period
- 4,250 stories by or quoting Center staff appeared in global media in this 3-year period
- 7.1 million people visited the Center's website during the reporting period for resources on ethics
- 9.9 million minutes of Ethics Center videos were watched over the last three years on YouTube
- 3,260 downloads of "*Ethics in the Age of Disruptive Technologies*" from our website for free and an additional 100 copies sold on Amazon since June 2023

Some metrics on the case studies mentioned in this report:

- 1,096,121 views of the Theranos case on YouTube occurred during this 3-year period. The Theranos teaching note had 377 downloads during the reporting period. The Theranos page on the Markkula Center website had 24,651 page views from 18,744 unique visitors
- The IKEA Case: One Company's Fight to End Child Labor was viewed 33,551 times by 21,731 unique visitors
- Crisis Data: An Ethics Case Study was viewed 12,059 times by 6,670 unique visitors
- Automation and Accountability: An Ethics Case Study was viewed 4,769 times by 2,962 unique visitors
- Emotion Recognition and Smart Cities was viewed 1,942 times by 1,442 unique visitors

Between July 2021 and June 2024, the Center held 43 educational events. Of these, 14 were programs on the ethical impact of AI and other technologies, 6 on democracy, free speech, and civil discourse, 5 on human rights, 2 programs on diversity, anti-discrimination and labor,1 on anti-corruption, and 1 on the environment. Of the programs that explore the ethical impact of AI and other technologies, matters of anti-discrimination, labor, and human rights were also touched on. In addition to the programs listed below, we also did 12 programs related to the Covid-19 vaccines which also included matters of anti-discrimination, labor, and human rights.

Center Programs on the Ethical Impact of AI and Other Technologies

Being Human in the Age of AI
Virtual Reality, Real Virtues, and Augmented Norms and Laws
The Character of AI—A Technology Ethics Conference
Determining Users' Ages Online: Ethical, Legal, and Technical Considerations
Investigative Newsrooms and Forensic Online Hoaxes: Ethics and Tech
The Tech that Comes Next
Generative AI: Ethical, Legal, and Technical Questions
Student Views on Age Authentication/Parental Controls Laws Online: A Conversation
What Does It Mean to Be Human in the Time of AI?

What do Jesuit Values Have to do with Tech Companies?
Panel of Distinguished Experts Discuss the Challenges of AI Regulation with the Honorable Ro Khanna
Are you Smarter Than ChatGPT?
AI-Powered Brain Implants: Novel Ethical Challenges
American Gun: The True Story of the AR-15

Center Programs on Diversity, Elimination of Discrimination, Labor

Ethical Storytelling
The Ethics of Hollywood: How Bias and Stereotypes Affect What We See in TV and Film

Center Programs on Democracy, Free Speech, Civil Discourse, and Dialogue

Religious Pluralism, Vaccine Resistance, and Civic Discourse with Robert Audi
How Journalism Might Help Democracy
Amanda Ripley: High Conflict
Ethics and Misinformation
Ethics and the United States Supreme Court: A Conversation with Judicial Ethicist Jeremy Fogel
American Gun: The True Story of the AR-15

Center Programs on Human Rights

The Human Right to Housing: State and Local Challenges
Aggression, War Crimes, Ethics, and the War in Ukraine
San Jose Mayor Matt Mahan Speaks on Homelessness in the City
Grants Pass v. Johnson: Can a City Criminalize Sleeping in Public?
American Gun: The True Story of the AR-15

Center Programs on Anti-Corruption

The Ethics of Digital Currencies

Center Programs on the Environment

Space Ethics