

The Pursuit of Legitimacy.

Corporate Use of Legitimation Strategies in CSR Crises.

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THE PURSUIT OF LEGITIMACY

ABSTRACT

Crises are well-recognized as events that damage a company's positive reputation, i.e. stakeholder perceptions of the company's favorability. A less recognized attribute that can be threatened by crises is legitimacy. Different from reputation, legitimacy describes stakeholder perceptions of the company's appropriateness and conformity with social, value-driven expectations. The loss of legitimacy can cause substantial threat to a company's existence. CSR crises are such incidents that put a company's existence at risk. They are defined as incidents where stakeholders perceive the company or its actions as inappropriate regarding social norms and values. If exposed to a CSR crisis, companies thus need specific crisis communication that aims to regain lost legitimacy. These 'legitimation strategies' are subject of this research. The objective is to gain in-depth insight regarding the use of legitimation strategies in the face of CSR crises which require active regeneration of legitimacy.

Guided by the main research question "*How do companies aim to regain their legitimacy in the face of a CSR crisis?*", the press releases related to five CSR-crises from 2012 to 2017 were analyzed in a multi-case study. The affected companies were British bank Barclays, German automotive group Volkswagen, US drug producer Mylan, US bank Wells Fargo, and US airline United. The accused inappropriate incidents were either cases of fraud or cases of serious unethical behavior. In a thematic content analysis patterns of legitimation that could be found within the cases as entities, shifts of legitimation that come with the crisis progress, and patterns of legitimation that were found amongst the cases were examined.

The results showed that legitimation in the case of a CSR crisis resembled the general discursive legitimation theories to a significant extent. Those results from practice that were different from the theory-based discursive framework could be explained as well. For instance, through other non-discursive legitimacy theories or the distinct characteristics of a CSR crisis. It was also recognized that different legitimation strategies are applicable for different legitimacy objectives.

Legitimation in the analyzed cases was used *holistically* within the press releases. A universal legitimation approach with legitimation leitmotifs was visible. Legitimation *progressively* mutated along with the crisis. In the 'reaction stage' legitimation based on vague emotional claims, in the 'correction stage', information about legitimizing corrective actions were communicated. The 'transformation stage' bases on the acceptance that structural change is needed to regain institutional legitimacy. Claims of long-term corporate transformation and future-orientation were characteristic for this final stage. Legitimation patterns were not only visible within the cases but also amongst them. Main themes that were utilized prominently by most of the companies were for instance 'customer commitment' or the announcement to 'make it right'. This *overarching* use showed that legitimation can be interpreted as a particular CSR crisis response strategy, a '*regeneration of institutional legitimacy*' strategy.

KEYWORDS: *Crisis Communication, CSR Crisis, Discourse, Legitimation, Press Releases*

Table of Contents

Abstract and Keywords

Table of Contents

Tables and Figures

1. Introduction.....	5
1.1. <i>Topic and Research Questions</i>	7
1.2. <i>Relevance</i>	8
Scientific relevance.....	8
Social relevance.....	8
2. Theoretical Framework.....	10
2.1. <i>The Ambivalence Between CSR and Crisis</i>	10
The CSR crisis.....	12
2.2. <i>Legitimacy</i>	13
Frameworks of legitimation.....	14
3. Method.....	20
3.1. <i>Research Design</i>	20
3.2. <i>Sampling and Data Collection</i>	21
3.3. <i>Operationalization</i>	23
3.4. <i>Validity and Reliability</i>	24
4. Results.....	25
4.1. <i>Case Overview</i>	26
4.2. <i>RQ1: Patterns of Legitimization Within CSR Crisis Cases</i>	30
Pragmatic, moral, and cognitive legitimacy.....	30
Regeneration of legitimacy.....	31
Legitimation leitmotifs.....	32
4.3. <i>RQ2: Shifts of Legitimation Based on the Progress of the Crisis</i>	37
Discursive phases of legitimation.....	38
4.4. <i>RQ3: Patterns of Legitimization Amongst CSR Crisis Cases</i>	41
Multi-case legitimation themes.....	41
Relation to theory.....	44
4.5. <i>Summary of Results</i>	46

5. Conclusion.....	49
5.1. <i>Conceptual Implications</i>	49
5.2. <i>Practical Implications</i>	50
5.3. <i>Limitations</i>	50
5.4. <i>Suggestions for Further Research</i>	52
References.....	53
Appendix A: List of Analyzed Press Releases.....	58

Tables and Figures

Tables:

Table 1: Discursive Legitimation Framework.....	16
Table 2: Overview of Cases.....	27
Table 3: Multi-Case Legitimation Themes.....	42

Figures:

Figure 1: Legitimation Phases Schema.....	39
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1. Introduction

Crises threaten a corporation's reputation. This assumption is widely recognized, by scholars as well as by organizations (Coombs & Holladay, 2002). What is not widely understood or examined, however, is the threat to legitimacy (Deephouse & Carter, 2005) that may occur because of a crisis. The loss of legitimacy following a Corporate Social Responsibility (CSR) crisis is particularly severe and merits attention from research and practice. This research analyzes how companies that face a CSR crisis seek to restore their legitimacy or the license to operate.

Legitimacy is defined as "a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions" (Suchman, 1995, p. 574). Thus, legitimacy is a status that is achieved when stakeholders believe that the company fits social expectations and behaves properly according to social values and norms. In the case of a crisis, this perception or belief is harmed, more so if a company is faced with a crisis of social responsibility (CSR crisis). Corporate Social Responsibility describes business practices that go beyond pure profitability, including environmental and social aspects, like human rights (van Marrewijk, 2003). A CSR crisis is a major incident, that is associated with a company's irresponsible behavior (Sohn & Lariscy, 2014; Coombs & Holladay, 2002), or violation against "norms and values cherished by society, and socially expected obligations" (Sohn & Lariscy, 2014, p. 25). When a company deliberately violates social norms and expectations, it might be perceived as being illegitimate (Boyd, 2000). Thus, in case of a CSR crisis, the company or its misbehavior is the cause and substance of the crisis.

What makes the threat to legitimacy especially severe, can be explained through the differentiation of the concept from reputation. Empirical findings underline that organizations can exist without a positive reputation; legitimacy, however, is the premise for a company to operate and exist (ibid.). Indeed, reputation is rather defined as a status of favorability or desirability, whereas legitimacy is a status of appropriateness and expectation-fit (Deephouse & Carter, 2005). When perceived as illegitimate, a company "faces serious obstacles to continued existence" (Boyd, 2000, p. 344). Although all crises require strategic communication to restore reputation damage (Coombs & Holladay, 2002), a CSR crisis that threatens legitimacy requires specific legitimating strategies (Boyd, 2000; Massey, 2001).

This research analyzes how companies that face a CSR crisis seek to repair the threat of legitimacy. In this regard, Boyd (2000) distinguishes two types of legitimacy: institutional legitimacy refers to the legitimate existence of a company, whereas actional legitimacy is the legitimacy of a company's actions and behavior. Depending on the severity and magnitude of the crisis and the attendant threat to legitimacy, companies may employ a range of legitimation strategies.

1.1. Topic and Research Questions

The purpose of this research is to gain in-depth insights and investigate possible patterns of the legitimation strategies which companies use to regain legitimacy in the face of a CSR crisis. In other words, *“How do companies aim to regain their legitimacy in the face of a CSR crisis?”* Through the research, following questions shall be particularly answered:

(1) *“What patterns of legitimization can be found within CSR crisis cases?”* This question examines, how legitimation strategies are used within the examined material. A comprehensive framework based on extant scholarship (e.g., Van Leeuwen & Wodak, 1999; the adaptations by Vaara & Tienari, 2008; Joutsenvirta, 2011) is used to guide the explication of legitimation strategies that are available to and employed by organizations facing a CSR crisis.

(2) *“How does the utilization of legitimation mutate based on the evolution of the crisis?”* This question is concerned with the evaluation of the legitimation strategies through the progress of the crisis, predicated on the idea that crisis response is not a static process. As crises evolve and unfold, different strategies may be employed in an incremental manner. It is furthermore a goal to investigate if, during the progress of the crisis communication, it is possible to distinguish strategies of legitimacy maintenance on the one hand and legitimacy rebuilding on the other (see Suchman, 1995).

(3) *“What patterns of legitimization can be found among CSR crisis cases?”* The question implies the analysis of content and style of the discursive legitimation strategies with regard to themes and patterns that might occur in between different cases.

The method applied is a qualitative multi case analysis of five corporate CSR crises. A thematic content analysis of press releases that were published on occasion the crisis was conducted. The crisis type, which parallels with a widely recognized crisis responsibility of the companies themselves, served as the single purposely selected identical criterion along the cases. The corporate branches, types of corporate misbehavior and scopes varied.

1.2. Relevance

Scientific relevance. This research adds value to corporate communication scholarship, as it deals with a concept (legitimacy), that has been taken into consideration by few studies, even though there is a “fundamental link between legitimacy and public relations” (Boyd, 2000, p. 351). The approach thus contributes to an increased academic attention to legitimacy, which might lead to increasing efforts to properly differentiate it from overlapping concepts such as reputation. In a broader sense, the research adds to corporate communication tactics and crises management. Crises are not created equal, and some research (e.g., Sohn & Lariscy, 2014; Coombs & Holladay, 2015) contends that CSR crises should be treated as a specific type of reputational crisis (separate from product and service failures or ‘corporate ability’ crises). However, as noted before, organizations experiencing a CSR crisis have more at stake – their legitimacy or license to operate may be under fire – making them worthy of investigation from a legitimization perspective. Furthermore, crisis research predominantly analyzes stakeholder reactions and pays little attention to the reasons and patterns behind the way corporations communicate.

The topic touches various fields of social science research at the same time – with crisis communication, CSR, and legitimacy being the core concepts. Other studies in this field are confined to one isolated concept, or the relationship between two of these concepts. Massey (2001) for instance examined the relation between legitimacy and crisis. Coombs and Holladay examine the relation of reputation and crisis (2002, 2006, 2015). This study, however, examines CSR, crisis, and legitimacy as related phenomenon, acknowledging the sensitive, reciprocal structure between them.

One very relevant aspect of this research is, that it applies existing discursive legitimation frameworks, and sets them into the new, specific setting of a crisis. The study thus brings together prior scholarship to provide new perspective. This way prior knowledge can be evaluated on the base of the specific crisis conditions that were not reviewed before in similar context. The qualitative approach of this study adds extra value to understand the relations between the concepts.

Social relevance. According to recent understandings of leadership communication and management practices, organizations are increasingly expected to act ethically: “It must be done – a stakeholder analysis of the total costs of ethical failures confirms the urgency”,

explain Thomas, Schermerhorn, and Dienhart (2004, p. 56). The cases analyzed in this research are based on such failures and show the seriousness of the consequences. The Volkswagen incident, for instance, was not only paralleled by the loss of stakeholder trust, but also resulted in legal consequences and severe financial costs. Leadership and management need to be aware of and understand the tangible threats that accompany a loss of legitimacy as caused by CSR crises – something this research adds to.

Beyond that, corporate management needs to be provided with strategies to maintain and regain legitimacy. A fundament for this is to comprehend the distinction between reputational goals and legitimacy goals: When legitimacy is considered as a premise for the existence of a corporation (Boyd, 2000) and as a behavior which is expected by stakeholders on the basis of norms and values – whereas reputation rather reflects a benefit and a behavior that is desired by stakeholders (Deephouse & Carter, 2005) – then different strategies to manage one or the other are required. There is a lot of theoretically and empirically based guidance on reputation management, however not much on ‘legitimacy management’ (Suchman, 1995; Massey, 2001). This does not mean that corporations did not yet manage legitimacy at all. However, as the concept is not well-adapted and a mostly unrecognized entourage of reputation, legitimacy might not have been managed consciously yet. Thus, to examine frameworks of legitimacy helps to establish awareness of this concept and might serve corporations to target legitimacy more deliberately. This improves corporate communication practices. Potential insights of this research, for instance legitimation frameworks that appear together with positive crisis outcomes, might hint towards explicit strategies that could be useful for companies. Thus, the research could be included into corporate crisis communication guidelines and help managers how to react properly when facing a CSR crisis or when legitimation is needed.

The following chapter will address the theoretical implications related to this research: The CSR crisis as well as legitimacy was defined, distinguished, and characterized thoroughly. After that, the methodology of the research will be explained, with specific attention to the research design and operationalization.

2. Theoretical Framework

The research approach is grounded and validated by the theoretical framework. For the purpose of this research, it is important to know about Corporate Social Responsibility (CSR) and its relation to crisis – especially as a base to understand the CSR crisis. Furthermore, legitimacy as a construct itself, types of legitimacy (e.g., institutional and actional), and existing frameworks of legitimation are outlined. These main considerations will serve as the theoretical basis that guides the examination of corporate legitimation strategies in the face of CSR crises.

2.1. The Ambivalence Between CSR and Crisis

Though there is no “one solution fits all”-definition (van Marrewijk, 2003, p. 95), Corporate Social Responsibility generally refers to voluntary company activities that demonstrate “the inclusion of social and environmental concerns in business operations and in interactions with stakeholders” (ibid., p. 102). CSR has become a widely spread business practice. According to the Governance & Accountability Institute (2017), 82% of the Standard & Poor’s 500 Index companies reported sustainability activities in 2016 – compared to just 20% in 2011. The Institute mentions the increasing importance of demonstrating sustainability as a reason for the remarkable jump. Likewise, scholars agree on various organizational benefits that can be derived through CSR. The use of CSR messages can, for instance, improve the goodwill of stakeholders and with it organizational reputation (e.g., Janssen, Sen, & Bhattacharya, 2015; Kaul & Chaudhri, 2017). This creation of goodwill is one of the reasons why CSR gets more important and is utilized by corporations with increased regularity (Coombs & Holladay, 2015; Janssen, et al., 2015). It is legitimately reviewed as an integral tool of “the global corporate agenda” (Janssen, et al., 2015, p. 183) and “today’s business environment” (ibid., p. 190); as well as corporate reputation- and crisis management (Coombs & Holladay, 2015) in particular.

CSR activities are “likely to affect stakeholder responses to crises” (Janssen, et al., 2015, p. 184), however these responses can have different forms with – from an organization’s perspective – ambiguous outcome: In the long-term, the rise of reputation through CSR serves as a “disaster relief” in crisis scenarios (Janssen, et al., 2015, p. 183). Coombs and Holladay call this the “halo effect” of positive pre-crisis reputation (2006, p.

123). In acute crisis situations, two moderating effects of CSR could be elaborated: Firstly, CSR influences stakeholder's perceptions and creates feelings of *favorability* that may compensate for aspects of the crisis (Coombs & Holladay, 2015, p. 144). Furthermore, "favorable attributions" might be particularly influential upon perceptions of "crisis responsibility" (Janssen, et al., 2015, p. 186), as stakeholders doubt if the company is in full scope responsible for the crisis. This leads to alleviating effects on the "blame process" (ibid.). Studies state that, "when a corporate crisis arises, the event will more likely be attributed to bad luck or maladroitness than to bad management or malevolence if stakeholders believe the company is socially responsible" (ibid.). Secondly, empirical studies did indicate that the use of CSR communication during a crisis leads to increased *identification* of stakeholders towards the company. This identification positively influences the way the stakeholder evaluates the company and thus serves as an "insurance" in case of a crisis (ibid., p. 189).

However, both benefits of CSR are void in case of a CSR crisis: A CSR crisis is based on (stakeholder perception of) irresponsible behavior of a corporation (Sohn & Lariscy, 2014; also see Coombs & Holladay, 2002). Corporate responsibility therefore cannot be doubted, and the blame will not be alleviated. In fact, there is empirical evidence for this assumption. A study found that CSR can "lower attributions of crisis responsibility", but explicitly not in the circumstance of a CSR crisis (Coombs & Holladay, 2015, p. 147). Another study reports that identified people react as negatively as other stakeholders if the crisis is very severe (Janssen, et al., 2015). This is an important finding, as CSR crises are typically severe (Sohn & Lariscy, 2014). Thus, stakeholder identification does likely not 'insure' a company facing a CSR crisis.

As mentioned above, the effect of CSR in crises varies. Whereas the possible assets of CSR in crisis situations were elaborated before, this section is dedicated to explain how CSR might even amplify negative impacts of the crisis (Janssen, et al., 2015): The negative impacts can be described through four core considerations: (1) An organization that is publicly known for its good CSR implications will more likely grasp media and public attention in case of a crisis. Thus, the perceived intensity of the crisis rises (ibid.). (2) When stakeholders question the intrinsic background of CSR messages and instead suspect selfish motivation behind those, the company might be perceived more negative than it would have been the case if it would not have communicated CSR at all. The blaming in case of a crisis will then also rise. (3) Through CSR, companies portray a specific "ethical identity" (ibid., p. 187). The expectations of stakeholders will rise, based on the recognition of this identity. (4) Depending

on the key factors crisis type, severity, and stakeholder identification, a “contrast effect” between CSR and the crisis may occur, which may actually amplify the outcome of a crisis (ibid.). This contrast effect was found especially in those cases, in which the company seemed “utterly responsible for the event” (ibid., p. 188).

The CSR crisis. “When CSR become integrated into the corporate reputation and become a public expectation, perceptions of social irresponsibility become a reputational threat” (Coombs & Holladay, 2015, p. 144f.) Having examined the relationships between CSR and crisis makes it abundantly clear that, in some cases, unfulfilled CSR expectations may not only intensify an otherwise unrelated incident, but even become the cause of the incident. This situation is referred to as a “CSR-based challenge” (ibid., p. 149), which occurs when stakeholders perceive the company as acting irresponsible. If wrongly dealt with, the challenge might transform into a full crisis (ibid.). This associated “CSR crisis” is defined as “a major event that poses a threat to reputation associated with norms and values cherished by society, and socially expected obligations” (Sohn & Lariscy, 2014, p. 25). In this context, social obligations may be environmental sustainability, commitment to community, et cetera (ibid.). It can therefore be distinguished from other crises, like natural disasters, as the causes are rather failures of communication or humans (ibid., see Shrivastava, Mitroff, Miller, & Miglani, 1988).

But which factors make the CSR crisis particularly challenging to deal with? Firstly, ethical issues may have an especially strong impact on the outcome of the crisis. The “contrast effect” between portrayed responsibility on the side of companies and perceived irresponsibility on the side of stakeholders intensifies negative stakeholder reactions (Janssen, et al., 2015, p. 188). Secondly, a study found that CSR crises cause “heavier damage to the evaluation of the firm” than other crises types (Sohn & Lariscy, 2014, p. 23). It was furthermore observed, that a CSR crisis was interpreted differently by stakeholders: A CSR crisis was perceived as more severe as others (ibid., p. 36). This finding is in line with Coombs’ (2002) argument, that a crisis becomes more severe, if the organization violates social norms. Remarkable damage of stakeholder trust in the company through CSR crises (Sohn & Lariscy, 2014) is one share of that ‘severity’.

Research furthermore indicates that a CSR crisis compromises long-term previous and current reactionary CSR efforts: The CSR reputational crisis erases the otherwise beneficial effect of CSR as reputational protection (Sohn & Lariscy, 2014; Coombs & Holladay, 2015). When the crisis itself is related to social irresponsibility, CSR messages in corporate crisis

responses may even become ineffective (Coombs & Holladay, 2015). Some scholars see legitimation as a framework within CSR (Joutsenvirta, 2011) or CSR messages as a means to gain legitimacy (Du & Vieira, 2012). The possibility that the legitimation strategies used by companies are not perceived as beneficial by stakeholders requires special attention.

Before moving to a discussion of legitimacy and legitimation in a CSR crisis, it is important to clarify the conceptual distinction between reputation and legitimacy. Deephouse and Carter (2005) differentiate legitimacy from reputation through “isomorphism”, which is “the extent to which an organization is mimetic (i.e. similar) on certain attribute(s) to other organizations in an organizational field.” (p. 332). Reputation is then measured through comparison amongst organizations, whereas legitimacy is solely dependent on a particular organization and its behavior. In line with relevant definitions of legitimacy, the authors explain that reputation is often described through terms like “desirability” or “favourableness [*sic!*]” whereas legitimacy is concerned with perceptions of “appropriateness” and “expectations” (p. 331). A CSR crisis is thus an occasion that not only threatens a company’s reputation, but also its legitimacy.

2.2. Legitimacy

As previously noted, legitimacy is defined as “a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions” (Suchman, 1995, p. 574). Legitimacy is thus a status that can be gained, maintained or regained through corporate management (Suchman, 1995). Because norms and values act as unwritten social rules or a form of contract, organizations must align to them, in other words, “organizations that conform to these institutional norms demonstrate cultural allegiance and attain legitimacy” (Du & Vieira, 2012, p. 416). Thus, legitimacy is a status that shows the proper integration of a company into societal requirements. This makes legitimation a requirement. When a company acts illegitimately, it “faces serious obstacles to continued existence” (Boyd, 2000, p. 344). Therefore, a crisis requires “legitimizing responses” (p. 343). In fact, Boyd (2000) situates legitimation as central to crisis response, arguing that a crisis would not require any response at all, if a company would not require legitimacy.

So far, legitimacy was defined as the perception, that the actions of an organization are perceived as appropriate (Suchman, 1995). Boyd (2000), however, distinguishes between two types of legitimacy. (1) Institutional legitimacy refers to the perception that the company’s

very existence is appropriate. (2) Actional legitimacy is the perception that an entity's actions are appropriate. Actional legitimation is used, when the organization believes "that its actions might be perceived as useful but irresponsible, or responsible but useless" (p. 349).

Depending on the form of crisis, the organization might either aim to regain institutional legitimacy by legitimizing its very right to exist; or aim to regain actional legitimacy by legitimizing its behavior, decisions, and actions. Further, Boyd contends that institutional legitimacy will be harmed and must be regained in severe crisis cases that threaten the company's existence, such as a plane crash (2000). Crises that question the appropriateness of a company's behavior or actions occur more often but are in general less severe.

One aim of this research is to analyze possible patterns of institutional and actional legitimation strategies as observable in CSR crisis responses.

Frameworks of legitimation. Suchman's (1995) considerations, especially on the management of legitimacy, are widely recognized and integrated in further research, making his work a valid groundwork in the field of legitimacy research. Suchman differentiates three categories of legitimacy: (1) "Pragmatic legitimacy" (p. 578) is based on stakeholder believes, that they personally benefit from the company and its actions, which makes it legitimate. (2) "Moral legitimacy" (p. 579) is based on stakeholder believes, that the company and its actions are positive from a less personal and more general, societal perspective. For instance, stakeholders could believe that society profits from the company and its actions, which makes the company legitimate. (3) "Cognitive legitimacy" is based on stakeholder believes that the company's existence or actions are not only profitable for themselves or society but are even "necessary or inevitable" (p. 582). In this succession, the three categories become harder to manage, but also more valuable for the company (ibid.). Furthermore, according to Suchman (1995), legitimation management "rests heavily on communication" but does also include "a wide range of meaning-laden actions" (p.586). Strategies of both scopes, discursive legitimation as well as meaning-laden legitimizing actions, can be utilized aiming to gain, maintain, or regain legitimacy. However, some of these specific strategies better serve one aim than another. Corporate moral misbehavior, as occurring in CSR crises, requires active approaches to *regain* legitimacy (ibid.). Suggested legitimacy management as a reaction to such incidents includes to "offer normalizing account" and to "restructure" (p. 597). First can be facilitated through denying any responsibility for the incident, excusing the incident by shifting the blame, justifying the incident, or explaining it. The first two options are likely not useful as they may cause severe negative perceptions. The third option seems most reasonable

but requires to be properly justified in line with social norms. The forth option is the best option if this proper justification cannot be utilized. The restructuring can also come in two forms, either the company seeks to regain legitimacy by integrating external authorities as monitors, or it seeks to regain legitimacy through structural change (Suchman, 1995).

As mentioned, this research will view legitimation as a discursive strategy, meaning that through the use of language, companies influence the perception of stakeholders. In Vaara and Tienari's (2008) opinion, (even subtle) "textual strategies" indeed serve as tools to create and manipulate "senses of legitimacy" (p. 992). Joutsenvirta (2011) based her work on the above-mentioned insights of Vaara and Tienari. Her legitimation frameworks are the conceptualized findings of research that analyzed companies' linguistic activities that aim to regulate stakeholder perceptions of legitimacy in a "socio-historical context" and with a "sense of societal norms" (p. 59). These considerations do not object to Suchman's view on the legitimizing effect of meaning-laden actions as companies likely frame such actions discursively. Discourses are frames that people use to make sense of issues and assign sense to new issues (Vaara & Tienari, 2008). These discourses can constrain the communication of corporations, forcing them to adapt to premises to be perceived as legitimate. But they might also serve as a benefit, when corporations consciously position themselves according to discourse premises or alter discourses to fit the business strategy. Companies, then, do not change their behavior but change the discourse to be perceived as legitimate (*ibid.*; Boyd, 2000). The discursive frame thus determines what and how companies need to communicate to be perceived as legitimate (Vaara & Tienari, 2008).

The following table draws on existing scholarship of discursive legitimacy strategies to provide a comprehensive framework of discursive legitimation that may be employed by organizations. This overarching conceptual framework serves as the guiding mechanism for the analysis of CSR crisis cases in this thesis.

Table 1: Discursive Legitimation Framework

To ensure scientific validity, the categories and communicative dimensions of this framework evolved from prior discursive frameworks. These base on qualitative as well as quantitative research of legitimacy, legitimation strategies or the utilization of CSR messages. Several of the integrated frameworks emerged as variations of Van Leeuwen and Wodak’s (1999) work who elaborated four functionalities of language that add to the construction of legitimacy.

Internally-based legitimacy		
Category	Background	Communicative Dimensions Messages
Legitimation based on values and norms	Referencing value systems as a moral basis for legitimacy is an example of the strategy of “Moral evaluation” (Van Leeuwen & Wodak, 1999, p. 108). Especially the communication of values and norms was considered in many frameworks – for instance by Dowling & Pfeiffer, in an early work from 1975, as well as by Austin & Gaither, in a recent work from 2017.	<p>Care for society</p> <ul style="list-style-type: none"> • Communicate long-term interest in society (<i>Austin & Gaither, 2017</i>) • Communicate obligation to help public (<i>ibid.</i>) • Communicate giving something back to community (<i>ibid.</i>) <p>Care for environment</p> <ul style="list-style-type: none"> • Communicate sustainability (<i>e.g., Dowling & Pfeiffer, 1975; Du & Vieira, 2012</i>) • Communicate environmental support (<i>ibid.</i>) <p>Internal care</p> <ul style="list-style-type: none"> • Communicate fair treatment of employees (<i>Zimmerman & Zeitz, 2002</i>) <p>Transparency</p> <ul style="list-style-type: none"> • Communicate that issue will be treated transparently (<i>Christensen, 2002</i>) <p>Values and norms in corporate profile</p> <ul style="list-style-type: none"> • Communicate how CSR is embedded in corporate profile (<i>Du & Vieira, 2012</i>) • Communicate about certificates and rewards regarding CSR (<i>ibid.</i>)
Legitimation based on history	The “legitimation based on history” is a new category, based on the insight, that a positively perceived corporate history (Singh, Tucker & House, 1986) and a long-term legitimate status (Suddaby & Greenwood, 2005) might be communicated to maintain legitimacy during a crisis.	<ul style="list-style-type: none"> • Communicate social history/traditions (<i>Suddaby & Greenwood, 2005</i>) • Communicate corporate history/traditions (<i>Singh, Tucker & House, 1986</i>)

Externally-based legitimacy		
Legitimation based on authority	<p>According to Van Leeuwen and Wodak (1999), “Authorization” (p. 108) describes legitimation through referencing the authority of e.g. law or persons of authority.</p>	<p>Legal authorization</p> <ul style="list-style-type: none"> • Law (Zimmerman & Zeitz, 2002) • Rules and Regulations (Van Leeuwen & Wodak, 1999) <p>Political authorization</p> <ul style="list-style-type: none"> • Government (Zimmerman & Zeitz, 2002) • Political leaders (Dowling & Pfeffer, 1975) <p>Professional authorization</p> <ul style="list-style-type: none"> • Professional bodies (Zimmerman & Zeitz, 2002) <p>Organizational authorization</p> <ul style="list-style-type: none"> • Powerful organizations (Zimmerman & Zeitz, 2002) <p>Industry authorization</p> <ul style="list-style-type: none"> • Legitimacy through legitimacy of industry (Zimmerman & Zeitz, 2002)
Cosmologically-based legitimacy		
Legitimation based on rationality	<p>“Rationalization” (Van Leeuwen & Wodak, 1999, p. 108) describes legitimation through referencing the usefulness of actions based on common knowledge and accepted relevance. Joutsenvirta (2011) distinguished the concept of rationalization into three sub-classifications and found that companies may reference scientific knowledge, national-economical or commercial benefits to become legitimate.</p>	<p>Economy</p> <ul style="list-style-type: none"> • Communicate economic benefits (Joutsenvirta, 2011) • Communicate business interests (<i>ibid.</i>) <p>Technology/Science</p> <ul style="list-style-type: none"> • Communicate scientific and technological knowledge (Joutsenvirta, 2011) <p>Logical consequences</p> <ul style="list-style-type: none"> • What will/would have naturally happened (Suddaby & Greenwood, 2005) • What cannot co-exist (<i>ibid.</i>) • Final purpose (<i>ibid.</i>) • What is outside of control (<i>ibid.</i>)
Legitimation based on normality	<p>Normality describes the communication of something as normal to gain higher acceptance and legitimacy. Different from Van Leeuwen and Wodak’s (1999) framework, Vaara & Tienari (2008) interpret “Normalization” (p. 991) as an equally weighted, independent strategy, whereas the earlier authors described normality as a part of authorization.</p>	<p>Normal behavior</p> <ul style="list-style-type: none"> • Communicate common behavior (Suddaby & Greenwood, 2005; van Leeuwen & Wodak, 1999; Vaara & Tienari, 2008; Joutsenvirta, 2011) <p>Normal beliefs</p> <ul style="list-style-type: none"> • Communicate common beliefs (<i>ibid.</i>)

The framework (see table 1) is based on the consideration, that the stakeholder perception of legitimacy can be influenced through discursive methods. Companies can spread specific content messages to positively impact the legitimacy-perceptions. These methods can be divided into five legitimation fields that belong to three spheres. Companies can either claim *internally-based legitimacy*, *externally-based legitimacy*, or *cosmologically-based legitimacy* (see Suddaby & Greenwood, 2005). These spheres can be differentiated from each other by asking which instance is articulated as the “legitimizer”, i.e. the advocate for legitimacy.

(1) In the first sphere, the company is its own legitimizer, or self-legitim�er. The company articulates, that through its own, internal legitimate actions or characteristics, it is legitimate. The first two fields, “Legitimation based on values and norms” and “Legitimation based on history”, belong to the “internally-based legitimacy” sphere. This means, that actions or characteristics of the company itself are considered legitimate, communicated as such, and thus utilized to communicate legitimacy. For instance, a company might point to its own charitable activities to influence the legitimacy-perception of the audience. It can also point towards its own legitimate history to influence the perceptions.

(2) In the second sphere, external authorities act as the legitimizers. In these cases, the company articulates, that external authorities state that it is legitimate. The field “Legitimation based on authorization” represents the “externally-based legitimacy” sphere. The company claims legitimacy, as external authorities consider the company legitimate.

(3) In the third sphere, there is no legitimizer but the cosmos or order of life and society themselves. Legitimacy is rather claimed on the base that there is no illegitimacy. The company articulates, that it is legitimate, as it is not illegitimate. Underlying this argumentation is the consideration, that the company was behaving normally or rationally. Thus, the fields “Legitimation based on rationality” and “Legitimation based on normality” belong to the “cosmologically-based legitimacy” sphere, or non-illegitimacy sphere.

The framework also relates to Suchman’s (1995) considerations on legitimacy-types. “Legitimation based on values and norms” as well as “legitimation based on history” could increase moral legitimacy, the understanding that the company and its actions serve the society. “Legitimation based on rationality” and legitimation based on normality” could increase cognitive legitimacy which reflects the perception that the company is inevitable. Pragmatic legitimacy – the communication of personal benefits for the stakeholder – would, following this line of thought, then be inadequately reflected by the framework. This is likely due to insufficient success to target pragmatic legitimacy through discursive messages.

Possibly, stakeholders become skeptic when benefits are advertised through corporate communication without proper demonstration through the actual implication of such benefits. Thus, this form of legitimacy can suggestively be rather targeted through actions than through discursive strategies. But as the framework focuses on discursive strategies, it does not suggest any strategies that add to pragmatic legitimacy.

This chapter presented the theoretical implementations that connect legitimacy and legitimation practices to CSR crisis. The involved concepts of CSR, CSR crisis, and legitimacy were defined, distinguished from overlapping concepts, and discussed regarding their position within the reciprocal structure. Based on prior research on the particular concepts, it was proven that a CSR crisis, as a crisis with distinct characteristics, poses severe risk to legitimacy, making legitimation strategies particularly significant for crisis communication. The scope of these strategies was then reviewed to build a framework that serves as a guidance for the analysis. The theoretical considerations thus serve the methodological operationalization, and this way function as the foundation for the empirical analysis.

3. Method

3.1. Research Design

The research examines how companies utilize corporate crises responses to maintain or regain their legitimacy when experiencing a CSR crisis. The research is qualitative, as it requires an in-depth understanding of the utilization of legitimation strategies in different circumstances. Neither the conditions nor the context of the observed strategies would have been investigable through quantitative measurement. In fact, the very objective of this research – to understand the ways companies aim to legitimize themselves and their actions in CSR crises – forecloses any quantitative approach. The decision to follow a qualitative approach is in line with the methodologies of related research where a single-case approach was employed, contending that a “limited number of texts is sufficient in a discursive analysis in which small speech acts are seen to reveal significant information” (Joutsenvirta, 2011, p. 60; see also Vaara & Tienari, 2008). A discursive approach was used, as legitimation strategies are broadly referred to as communicative strategies to influence perceptions (see e.g., Vaara & Tienari, 2008).

As the research aimed to examine patterns in how legitimation strategies are utilized in varying situations, a multiple case study method was chosen. Case studies do allow an application of theory to real situations. The case study, as a method, is particularly valid, as it allows to examine “complex phenomena within their contexts” (Baxter & Jack, 2008, p. 544). Multiple cases enable the comparability of different legitimation practices in different crisis incidents (Baxter & Jack, 2008; Gustaffson, 2017), which is required to recognize those patterns the research question asks for. Instead of being limited to an analysis of intra-case findings, the analysis of multiple cases can produce intra- as well as inter-case findings (Gustaffson, 2017). This cross-case comparability marks an essential perspective of the research question. Adding to that, the multiple case approach is considered especially reliable (Baxter & Jack, 2008; see Gustaffson, 2017).

3.2. Sampling and Data Collection

As the research has taken the form of a case study, the sampling was purposive. A particular press release equaled one research item, and the crisis as a whole equaled one case. The sample size was based on research regulations and logic reasoning for proper validity of insights and patterns.

The cases were chosen based on the *Holmes Report* annual “Top Crises” review. All crises that were listed in the annual reviews (starting with the most recent, from 2017 and going back to the first one of 2010) were closely examined and sorted after specific criteria. The crises fit the definition of a CSR crisis as noted in the introduction and literature review, and thus fulfill four key criteria: (1) The crisis relates to ethical or moral issues, (2) it is rooted in perceived misbehavior of the company itself and thus would have been preventable, (3) it affects several distinct stakeholder groups, and (4) the crisis had a significant impact on the perceived reputation, as can for instance be measured through reputation rankings, such as the RepTrac® by Reputation Institute. Furthermore, the research setup required several other restrictions: The crisis needed to affect majorly one single company. Industry crises (compared to corporate crises) were thus excluded. As they communicate CSR-related themes differently from other companies, crises that affected NGOs were excluded as well. For practical matters, the crises were limited to western companies that offered sufficient items of English language.

As can be seen, the sampling approach used in this research shares similarities to valid qualitative case study sampling methods, such as “time and place”, or “definition and context” (Baxter & Jack, 2008 p. 546). The first sampling method applies, given the fact, that the cases are limited to Western companies (from the US and EU), and were picked based on their recency. Latter method applies as well, as the cases are limited to ethical issues of social misbehavior and moral issues of fraud.

Based on this narrowed list of valid cases, the most recent five were chosen to be examined in the research. Of this list, two cases (#3 and #5) dealt with ethical issues regarding social misbehavior, whereas the other three cases (#1, #2, and #4) portray ethical issues connected to fraud. The cases are, listed in a chronological order:

1. The 'Libor scandal', which affected Barclays in 2012.
2. The 'emission scandal' that Volkswagen had to deal with in 2015.
3. The scandal that affected Mylan in August of 2016 based on the extreme price rise of the EpiPen®, a monopoly life-saving medical product.
4. The 'fake account scandal' of Wells Fargo, that got revealed in September 2016.
5. The 2017 'Flight 3411' incident of United Airlines, in which a passenger got hurt while being forcefully removed from his seat.

To examine corporate legitimation strategies in a CSR crisis, it was consequent to analyze corporate press releases. This medium was chosen, as it is a corporate discursive tool to spread consciously chosen messages as part of a communication strategy. Through the access of journalists and mass media, as well as through the distribution on corporate social media channels, the press releases can reach a wide public. They are openly and easily accessible through the newsroom of the corporate website.

The selection process revealed that only very few companies provided unique crisis responses for social media channels. Thus, the press releases are in some cases the only official statement, however, in all cases the most official and thus most appropriate crisis response. A study by Choi (2012) shows, that themes of crisis communication can be well analyzed by examining related corporate press releases. The success of this prior study to analyze specific crisis communication strategies in press releases thus corroborates confidence for the selection in this research.

The five cases consisted of four up to sixty-one press releases each. This variance is caused by the varying scope and characteristics of the crisis and crisis communication. To identify changes and a possible progressive style of legitimation, it was necessary to analyze the full chronological width of press releases that were related to the CSR crisis. The identification of those press releases that were affiliated with the crisis incident was achieved as they either referred to the incident in the text or were categorized as crisis-related on the distribution channel (newsroom of the corporate website).

3.3. Operationalization

The thematic analysis was used to gain in-depth insights about specific corporate communication around the concepts of legitimacy. Based on this basic consideration, the coding followed an inductive strategy, meaning that codes derived from the content that was analyzed.

The analysis included “pattern matching” and “cross-case synthesis” (Baxter & Jack, 2008, p. 554) – meaning that patterns that were found across research items (meaning particular crisis statements), within a case (meaning the particular crises case), or across cases were examined. Furthermore, the analytical strategy of “linking data to propositions” (ibid.) – meaning the link between the content-driven codes and the existing legitimacy framework – were used. Logical models that do not relate to any yet existing framework evolved through the building of explanations (Baxter & Jack, 2008) and were thoroughly considered. Furthermore, the evolution of legitimacy claims within cases was taken into account by analyzing the items of each case with respect to its chronology and variations in the utilization of legitimation strategies. The framework (see table 1), compiled from existing research, was used as a guidance for the analysis.

Several steps of analysis were followed to gain insights that enabled answers to all research questions. Firstly, each case was examined separately by analyzing the press releases in chronological order. Based on the conceptual knowledge as depicted in the theoretical framework, persuasive communication items were identified and listed as themes. These discursive themes were studied regarding their relevance within the case. A valid indication for the relevance of a theme was the frequency of appearance. As recurring themes were considered to be signs of consciously targeted utilization, or strategic utilization, they were accepted as potential legitimization strategies and thus acknowledged for further analysis. Besides interpreting their relevance, it was also analyzed at what point which of these recurring themes were utilized in the course of the case. They were then furthermore analyzed across cases to identify similarities and differences in the selection and frequency of use. After that, conformable themes were arranged into categories to increase the conceptual sense. Through the categorization, the empirical results could be set into relation with the conceptual frameworks to understand to what extent legitimization strategies in CSR crises resemble the unspecific legitimation frameworks.

3.4. Validity and Reliability

Validity and reliability are specific criteria to measure the quality of quantitative studies. The quality of qualitative research thus cannot sufficiently be described through those two concepts (Golafshani, 2003). Instead other terms should be used: “credibility”, “neutrality”, “applicability” or “confirmability” (Lincoln & Guba, 1985, cited after Golafshani, 2003) might be more relevant criteria for good qualitative research.

The research can still be considered valid, as it firstly orientated after well-established, accountable theoretical models and frameworks. It secondly followed the requirements of reliable and valid case study design and implementations (see Baxter & Jack, 2008). Thirdly, it followed the guidelines of thematic analysis (see Golafshani, 2003), and implies themes with consideration of the conceptualizations of legitimation frameworks by Joutsenvirta (2011), Vaara & Tienari (2008), and Du & Vieira (2012).

The following chapter includes an extensive review and interpretation of the results that emerged from the herein described methodological research approach.

4. Results

In communication research, legitimacy describes the status an organization achieves if its behavior and very existence is perceived as consistent with social values and norms (Suchman, 1995). A CSR crisis, on the other hand, is defined as perceived social misbehavior of an organization (Sohn & Lariscy, 2014). Thus, in theory, a CSR crisis is a particular threat to legitimacy that requires special crisis response strategies which focus on regaining legitimacy (subsequently referred to as ‘legitimation strategies’).

The purpose of this research was, firstly, to answer how companies in CSR crises make use of legitimation. Thus, the goal of the analysis was to examine to what extent and how companies that face CSR crises utilize legitimation strategies in their crisis responses. This goal was translated into three guiding research questions that lead the analysis.

(1) “*What patterns of legitimation can be found within CSR crisis cases?*” This question required the individual analysis of each case to research, firstly, what legitimation themes could be found and how they connect to established frameworks, secondly, whether patterns of legitimation themes in the crisis case were detectable and what understanding these patterns offer regarding the discursive strategy of companies. Besides that, the analysis that resulted from this question gave insight if the use of legitimation themes related to the basic conditions of the company or the incident.

(2) “*How does the utilization of legitimation mutate based on the evolution of the crisis?*” This question bases on reviewing the legitimation chronology that emerged from the individual cases. It served to examine the steadiness or progress of legitimation claims. Communication shifts and their possible strategic relevance were reviewed as well as progress regularities amongst the cases. This way the progressive characteristics of legitimation could be interpreted.

(3) “*What patterns of legitimation can be found among CSR crisis cases?*” Here, the similarities amongst the cases were analyzed and the cases were reviewed as an entity. The results were used to examine whether legitimation strategies were individual and case-specific or overarching and general. The results of this last analysis are especially valuable, as they help to understand if ‘legitimation’ can be recognized as a unique crisis response *strategy*, or if the term rather describes *various communication themes* that are used to gain/maintain/regain ‘legitimacy’ – as the previously introduced legitimation frameworks suggest.

To give a proper insight into the data on which the results are based, the chapter starts with a short case overview. The results will then be presented aligned with the research questions noted above. The chapter will be completed with a research results summary.

4.1. Case Overview

The five analyzed cases include CSR crises from 2012 through 2017, of which two cases resemble legal but unethical behavior and three cases resemble unlawful behavior like fraud. Each case gained wide public response and resulted in investigations by authorities and high fees. A short description of each case follows below. Table 2 provides detailed information on each company, case timeline and magnitude.

The analyzed cases include: (1) The 2012 lending rate fixing scandal of British bank Barclays that led to high fees, criminal investigations, and arrests as well as structural change within the company and significant external changes of the Libor settings. Here, a total of 13 case-related press releases were analyzed. (2) The 2015 case of automotive group Volkswagen that purposely manipulated Diesel engines to bypass ecological regulations which led to severe distrust into the whole industry, extensive fees, and software changes for million cars as well as the long-term strategic and structural transformation of the group. 61 case-related press releases were analyzed. (3) Healthcare producer Mylan's extreme price rise of a monopole life-saving allergy drug which required co-payments and even the launch of a new, cheaper generic product in 2016. This case included four case-related press releases. (4) The 2016 case of unwillingly opened customer accounts by employees of US financial institute Wells Fargo which resulted in changes in staff, management, and particularly corporate policies. A total of 29 case-related press releases was analyzed. (5) The case of US aviation company United Airlines of 2017 where a passenger was injured as he was forcefully removed from his plane seat which required repetitive apologies to the passenger and the outraged public and led to severe distrust, lawsuits, fees, and policy changes. Here, seven case-related press releases were found and analyzed.

Table 2: Overview of Cases

Company	Case Description/ Timeline	Magnitude
Barclays Libor Scandal		
<p>Branch: Finances</p> <p>Headquarters: GB</p> <p>Activity: 120,000 employees in over 40 countries</p> <p>(Barclays)</p> <p>Material: A total of 13 press releases</p>	<p>2005:</p> <ul style="list-style-type: none"> • First evidence of London inter-bank lending rate (Libor) manipulations <p>2007 and 2008:</p> <ul style="list-style-type: none"> • Internal mails regarding inaccuracies • UK and US authorities receive notifications • report of the Wall Street Journal regarding the suspicion <p>2009:</p> <ul style="list-style-type: none"> • New Libor setting guidelines, ignored by Barclays <p>27th June 2011:</p> <ul style="list-style-type: none"> • After admitting misconduct before UK and US authorities, Barclays pays fees totaling around 290 million Pounds in both countries <p>2nd and 3rd July 2011:</p> <ul style="list-style-type: none"> • Chairman Marcus Agius, CEO Bob Diamond, and the COO resign <p>5th July 2011:</p> <ul style="list-style-type: none"> • Moody’s sets rating from stable to ‘negative’ <p>6th July 2011:</p> <ul style="list-style-type: none"> • Launch of criminal investigation, arrests of three men follow in December <p>August 2011:</p> <ul style="list-style-type: none"> • Further banks face legal consequences in the US because of Libor manipulations <p>January 2013:</p> <ul style="list-style-type: none"> • Barclays establishes new code of conduct to prevent future manipulations <p>(BBC, 2013)</p>	<ul style="list-style-type: none"> • “The evidence led to some speculation that senior government officials regarded Barclays as potentially vulnerable and after the series of recent banking failures, were willing to overlook discrepancies in Libor reporting” (Thompson, 2016) • Shift to ICE Libor as significant reform • Restructuring of the Financial Authority in GB • “Keen to minimise [<i>sic!</i>] the risk of further reputational damage and regulator scrutiny, investment banks have introduced new restrictions on both internal and external communications” (ibid.) • Restructuring
Volkswagen Diesel Scandal		
<p>Branch: Automobile</p> <p>Headquarters: GER</p> <p>Activity: 71 production sites in 20 European countries. Further 49 sites around the world</p> <p>(Volkswagen)</p> <p>Material: A total of 61 press releases</p>	<p>2005:</p> <ul style="list-style-type: none"> • VW tries to produce a new diesel engine that conforms to the strict US pollution standards. A group of employees decides to manipulate the engines to cheat on test results. <p>May 2014:</p> <ul style="list-style-type: none"> • US authorities receive a study which shows that VW diesel vehicle road use emissions deviate significantly from bench test results • A memo is sent to CEO Winterkorn, it is uncertain if he took proper notice <p>November 2014:</p> <ul style="list-style-type: none"> • Winterkorn receives another memo, talking of fees of approx. 20 million euros in the US <p>Summer 2015:</p> <ul style="list-style-type: none"> • The issue is content of a meeting with the Board, the CEO asks for further clarification <p>3rd September 2015:</p> <ul style="list-style-type: none"> • VW gives formal information to US authorities 	<ul style="list-style-type: none"> • Financial loss caused by the high fees as well as implementation costs and sales drop • Stop of diesel selling in US (Taylor, 2017) • Diesel bans in Germany • Terminations • New long-term strategy with sustainable goals (Strategy 2025)

	<p>18th September 2015:</p> <ul style="list-style-type: none"> • VW is forced to make a disclosure, admits that 11 million vehicles worldwide are affected <p>23rd September 2015:</p> <ul style="list-style-type: none"> • CEO Winterkorn resigns <p>January 2016:</p> <ul style="list-style-type: none"> • Start of the software implementations in GER <p>January & March 2016:</p> <ul style="list-style-type: none"> • Lawsuits of US authorities <p>October 2016 throughout 2017:</p> <ul style="list-style-type: none"> • Settlement discussions <p>(Taylor, 2017)</p>	
Mylan EpiPen Prize Rise		
<p>Branch: Pharmaceutics</p> <p>Headquarters: US</p> <p>Activity: Over 35,000 employees in 50 plants worldwide. More than 7,500 marketed products</p> <p>(Mylan)</p> <p>Material: A total of 4 press releases</p>	<p>18th August 2016:</p> <ul style="list-style-type: none"> • Bernie Sanders, a US senator tweets about NBC's report of a 400% price rise of Mylan's life-saving allergy drug EpiPen over seven years <p>22nd August 2016:</p> <ul style="list-style-type: none"> • The New York Times also comments this story • Several senators ask for investigations <p>24th August 2016:</p> <ul style="list-style-type: none"> • Then presidential nominee Hillary Clinton posts about the in her opinion outrageous and unjustified price rise on Facebook • Mylan's lobbying initiatives that led to a high increase of profits are criticized • Mylan's stock declines by more than six percent <p>25th August 2016:</p> <ul style="list-style-type: none"> • In a TV interview, Mylan CEO Bresch fends off accusations of abusing the monopoly power and blames the health care system • Announcement that co-pay program will be increased from 100 to 300 dollars • Sarah Jessica Parker quits her ambassador role for Mylan <p>6th September 2016:</p> <ul style="list-style-type: none"> • Investigations against Mylan <p>(Czarnecki, 2016a)</p>	<ul style="list-style-type: none"> • Settlement payments • Introduction of new generical drug • Extension of assistance programs • Negative public perception • Political involvement, lobbying consequences • Investigations
Wells Fargo Fake Account Scandal		
<p>Branch: Finances</p> <p>Headquarters: US</p> <p>Activity: 263,000 employees in 42 countries and territories</p> <p>(Wells Fargo, 2017)</p>	<p>8th September 2016:</p> <ul style="list-style-type: none"> • US authority fines Wells Fargo for the creation of at least two million unauthorized accounts • Wells Fargo says it terminated more than 5,000 low-level employees for unethical behavior in a five-year period, but no senior staff <p>13th September 2016:</p> <ul style="list-style-type: none"> • The bank announces the end of the sales goals which have led to the unlawful behavior of the workforce • CEO Stumpf does not want to resign but lead the company forward <p>16th September 2016:</p> <ul style="list-style-type: none"> • Investigations of US authorities against Wells Fargo are initiated 	<ul style="list-style-type: none"> • Loss in stock • High fees • Terminations and resignings • Severe loss of trust • Legal consequences

<p>Material: A total of 29 press releases</p>	<ul style="list-style-type: none"> • Carrie Tolstedt, who is responsible for the community bank, resigns <p>September 2016:</p> <ul style="list-style-type: none"> • Various ex-employees state Wells Fargo was suppressing whistleblowing by early terminations • Criticism against CEO Stumpf becomes stronger and stronger <p>12th and 14th October 2016:</p> <ul style="list-style-type: none"> • Stumpf steps down • It emerges that Stumpf sold over 60 million dollars of Wells Fargo stock in the months before the investigations (Czarnecki, 2016b) 	
United Airlines Flight 3411		
<p>Branch: Aviation</p> <p>Headquarters: US</p> <p>Activity: About 88,000 employees, 354 destinations (124 outside of the US), serving 48 countries</p> <p>(United, 2016)</p> <p>Material: A total of 7 press releases</p>	<p>10th April 2017:</p> <ul style="list-style-type: none"> • Outrage emerges as a video from the previous day circulates social media that shows a bloody-faced passenger being violently removed from a plane before boarding • The passenger’s identity is revealed: The person affected is 69-year-old Dr. David Dao • United issues a first statement of CEO Munoz in which he apologizes for the need to “re-accommodate” four passengers • An internal letter of Munoz to the employees becomes public, in which he describes Dao as aggressive • United’s response is widely criticized <p>11th April 2017:</p> <ul style="list-style-type: none"> • Market value of the Holding tumbles • A second statement is published, apologizing again and pledging a review <p>12th April 2017:</p> <ul style="list-style-type: none"> • Munoz appears on TV, apologizing again in an interview • Calls for boycott against the airline rise <p>13th April 2017:</p> <ul style="list-style-type: none"> • Dao’s attorney – a US top lawyer – says United treated passengers like livestock. He explains Dao has suffered several injuries, including a broken nose, the loss of two front teeth, and a concussion • United apologizes again, saying it will only call law-enforcement in concrete matters of security in the future <p>April 16th 2017:</p> <ul style="list-style-type: none"> • United changes its overbooking policy, seated passengers cannot be removed anymore <p>April 21st 2017:</p> <ul style="list-style-type: none"> • The Holding denies Munoz a planned promotion <p>April 22nd 2017:</p> <ul style="list-style-type: none"> • Surveys show that 40+% of millennials would not fly United anymore or avoid it (Czarnecki, 2017) 	<ul style="list-style-type: none"> • Drag of United’s stock: “the market clearly saw the crisis as creating risk around United’s fundamental business” (Desjardins, 2017) • Changes in business policies at United and two other US airlines (Aratani, 2017) • Decrease in passenger de-boarding across the whole US aviation industry (ibid.) • “The lasting effects of this incident on the United brand will likely be irreparable. Any United ad in the near future touting [...] any claims of treating customers well will be viewed through the prism of this incident and seem absurd and even infuriating” (Towns, 2017). • “Decades of brand building has been undone and United’s lasting brand image will be overshadowed” (ibid.)

4.2. RQ1: Patterns of Legitimization Within CSR Crisis Cases

As described in the introduction of this chapter, by answering the first research question, the relation of applied legitimation strategies in specific CSR crises to legitimacy theory could be contemplated, increasing the understanding of legitimation. The analysis revealed that companies indeed repetitively utilized various persuasive communication themes, which likely were utilized to positively influence stakeholder perceptions and thus might fit into the established understanding of legitimacy based on theoretical frameworks.

Pragmatic, moral, and cognitive legitimacy. As introduced in the first half of the research, Suchman (1995) differentiated three categories of legitimacy (pragmatic, moral, and cognitive) which can be aimed at through different communication management strategies but can also be combined to achieve a higher legitimizing effect. The results of the analysis rather reflect latter strategy. Within the cases, themes occurred that relate to all three forms of legitimacy, thus indeed being examples of legitimation.

Suchman understands pragmatic legitimacy as the stakeholder believe that they personally benefit from the affected company or specific actions, which leads to the perception that it and its actions are legitimate. Themes that may serve to add to this perception were found for instance in the case of Volkswagen. Targeting at the legitimation by US customers, the company did not only promise to properly fix the affected cars, but also offered cash payments for each affected owner, thus creating a personal financial benefit for the customers.

Moral legitimacy is generated when stakeholders see the company or its actions as a benefit to society. Mylan, which presented itself as an advocate for patients and families and emphasized its social programs, serves as an example for a company that utilized legitimation themes that could add to the perception of moral legitimacy. Such themes were found in the case of Wells Fargo as well. Here, the company replied to the canceling of local partnerships by emphasizing a strong engagement towards the local communities.

Cognitive legitimacy, the perception that a company is inevitable, could be strengthened through reference to the strong or even superior position of the company, which occurred in several cases, for instance at Wells Fargo that claimed to be “one of the strongest and most well-known financial services companies in the world” (#08, 12.10.2016). However, this type of theme only indirectly supports a perception of inevitability. In the analyzed press

releases no direct claims of corporate inevitability were found, which consolidates Suchman's (1995) assertion that latter form of legitimacy is hardest to manage.

In total, most acknowledged legitimation themes or strategies in the cases could however not be related to any specific form of legitimacy. Thus, though the analysis revealed that Suchman's forms of legitimacy could indeed be differentiated in the cases, his theoretical distinctions are not capable to adequately reflect the patterns of legitimation in the examined CSR crisis responses.

Regeneration of legitimacy. As explained previously, CSR crises are incidents of perceived corporate misbehavior regarding norms and values, thus they are incidents of the loss of perceived compliance to norms and values, per definition equivalent to the loss of legitimacy. The main communication goal or crisis response goal is then to regain legitimacy which can be achieved through specific legitimacy management strategies (Suchman, 1995).

To offer "normalizing account" (ibid., p.597) was one suggestion for a regeneration of legitimacy. This strategy comes in four options – deny responsibility, excuse the incident by accusing other instances, justify the behavior, or explain it – of which three were visible in the analyzed cases. Mylan's crisis response strategy was to deny responsibility for the whole incident. The company argued the US healthcare system held responsibility for the criticized price rise of drugs. Noticeably, the complete crisis communication in that case is constructed around this denial strategy. Coming up with excuses was an option that was for instance used by Volkswagen when they argued that only a limited number of people, without superior levels of management being involved, decided for the manipulations, initiated and executed them (Volkswagen, #30, 02.03.2016). Suchman (1995) sees the blaming of specific employees as one frequent example of how this second option is utilized by companies. It is important to note that, different from Mylan's utilization of the first option, in the analyzed cases this second option was not determining the whole communication. Rather, the excuses were interspersed into a communication that generally showed more awareness of responsibility. As Suchman argued, the third option – namely the logical justification of one's actions – which according to him usually generates best success, cannot be employed in all cases. Indeed, within the analyzed cases this method was not clearly visible. Supposedly, justification based on legality will not be accepted as long as the company acted counter to moral demands. Suchman's view that justification can be a successful option, in the setting of a CSR crisis, could potentially be challenged. The fourth option the author presents is then explanation. Arguably, facing a CSR crisis, it might make best sense to accept responsibility

and show transparency through thorough explanation of the incident. In the case of the forceful removal of a passenger United Airlines chose this option when they published an eleven-page review about the incident, what practices caused it to happen in the first place, and how these practices were then changed (#07, 27.04.2017).

Another method for companies to regain legitimacy is to “restructure” (Suchman, 1995, p. 597), either through the integration of external monitors, or through structural change within the organization. Especially latter strategy was utilized in the analyzed cases. Except Mylan, which chose the denial strategy, all other cases emphasized how they changed their policies and even opted for a transformation of the corporation’s structure and long-term perspective. Mylan does not utilize this, as the legitimacy regeneration methods need to be utilized in a consistent manner. The denial of responsibility will not appear credible when at the same time the company admits to a need for substantial change.

Though most of Suchman’s (1995) classifications for legitimacy regeneration management were apparent within the analyzed cases, the cases included many more legitimating themes that are not covered by his theories. An explanation for this might be that, he rather presents broader classifications of legitimacy concepts than concrete executable strategies of legitimation. The legitimation framework which was established as part of this work provides a more detailed perspective while solely focusing on discursive legitimation methods. In the following sections, the analysis results of the first research question are set into relation to this legitimation framework.

Legitimation leitmotifs. To properly answer the first research question, it was not only important to gain awareness if and what forms of legitimation were used in the cases, but also how legitimation was strategically and discursively applied. The analysis showed that legitimation themes were not applied disorderly within the cases. Some legitimation themes recurred frequently amongst many of the press releases. This shows that the themes were chosen consciously and strategically instead of randomly and intuitively. The recurring themes vary in their significance, as some occur more often or prominently than others. These most prominent legitimation themes of the cases are what is here defined as legitimation leitmotifs.

The voluntary co-operator. ‘Voluntarism’, the announcement of various voluntary concessions, was found to be a main persuasive, legitimating theme in the case of Barclays. The discursive promise to satisfy more than what is claimed by law or public expectations as a sign of goodwill and commitment touches the concept of *‘legitimation based on values and*

norms'. This is, when the company announces voluntary actions that show *care for society* or the voluntary publication of information as a form of *transparency*. At the same time, the theme can also be interpreted as a scope of *'legitimation based on authorities'*, considering that the claim to voluntarily co-operate with authorities can rise perceived legitimacy.

Voluntarism can also be discussed in the light of a distinction between law and morality. A CSR crisis is defined as a crisis in which the company or its actions are perceived as violating social values and norms. This perception of immorality can occur together with violations of law but does not depend on any such. Unlawful behavior which is not perceived as violating socio-moral values would possibly not cause a CSR crisis at all. Considering Carroll's (1991) pyramid of corporate responsibility, ethical behavior is more favorable than legal behavior. Voluntariness in this sense serves as a legitimation as it communicates the will to do more than required by law. This makes voluntariness a theme very close to the concept of CSR: CSR actions are defined as voluntary actions, voluntariness could thus indicate actions that are examples of CSR. In the case of Barclays however voluntarism occurred not as a discursive reference to CSR actions. Rather, the theme was used reactionarily to the crisis incident, for instance the voluntary distribution of information upon the incident or the voluntary support of investigations were emphasized.

Though 'voluntarism' was not established in the legitimation framework as such before, the theme touches several principles of legitimation as evaluated in the previous paragraph. Voluntarism connects to values and norms such as commitment, CSR or transparency and is used to portray goodwill. Hence, a legitimizing function of the communication of voluntary behavior and beyond-expectation-actions must be considered.

Next to the legitimating leitmotif of voluntarism, the company also communicates an extensive will to co-operate with authorities. This theme hints towards the satisfaction of authority expectations. Authorities that are perceived as legitimate by stakeholders likely influence their perceptions. Thus, if the legitimate authority recognizes the co-operation efforts of the affected company as pleasing, the perceived legitimacy among stakeholders probably rises as well. *'Legitimation based on authorities'* indeed serves as a category in the legitimation framework and was researched and recognized by legitimacy scholars before (Van Leeuwen & Wodak, 1999; Vaara & Tienari, 2008).

The solving clarifier. Volkswagen's core legitimation themes base on the central aim to fully clarify the incident. This aim can be interpreted as grounding on *'legitimation based on transparency'* (Christensen, 2002), as was established in the legitimation framework, and 'announcement of activity', a communication style which was frequently found in the cases.

Volkswagen's crisis communication as visible in the press releases furthermore includes an extraordinary emphasis on the concrete solutions. As the legitimation framework focuses on discursive legitimation, it does not recognize references to solutions as methods for legitimation. Gronau, Schmidtke, and Biegoń (2014) however differentiated between discursive legitimation, as is substance of this research's legitimation framework, and legitimation in "the more substantive form of behavioral adaptation and change" (p. 15). They even argue that in crisis situations companies might be especially "forced to adapt their principles, purpose and institutional setup in order to conform to the prevailing normative expectations" (ibid.). As described before Suchman (1995) saw legitimation as mainly communicative as well but also recognized a legitimizing effect of "meaning-laden actions" (p. 586). This described alternation of business structures as legitimizing reactionary solution to crisis-related pressure (Gronau, et al., 2014) – which was likewise discussed by Suchman (1995) – fits the 'solving' leitmotiv of Volkswagen, whose Board "approved a new management structure for the Group and the brands as well as for the North America region" (Volkswagen, #07, 25.09.2015).

The innocent advocate. This title describes the self-portrayal of Mylan in its crisis response press releases. Mylan does not accept responsibility for the accusations, but instead shifts the blame to other actors (see Benoit, 1997; Suchman, 1995), in this case the US healthcare system (e.g., "With the current changes in the healthcare insurance landscape, [...] deductible amounts continue to rise. This [...] shift has presented new challenges for consumers, and now they are bearing more of the cost", Mylan, #01, 22.08.2016), and portrays itself as innocent. This practice echoes parts of the '*legitimation based on rationalization*' category that was introduced in the legitimation framework. When Mylan denies responsibility, it considers the crisis incident to be caused by events which were *outside of its control*. Following this claim, Mylan is then able to frame reactionary crisis solutions, such as settlement payments or product price reductions, as altruistic, voluntary actions for the sake of the community ("The launch of a generic EpiPen [...] will offer a long-term solution to further reduce costs and ease the burden and complexity of the process on the patient", Mylan, #03, 29.08.2016) instead of concrete measures to solve the crisis. Rather, Mylan communicates the issue as an external occasion that stimulated their 'altruistic advocacy' – resembling '*legitimation based on values and norms*', particularly *care* for stakeholders (van Leeuwen & Wodak, 1999; Vaara & Tienari, 2008; Joutsenvirta, 2011) and *social responsibility* (Dowling & Pfeffer, 1975; Du & Vieira, 2012). If this communicative strategy is perceived as intended, it can well serve to gain legitimacy. Altruism and CSR are

on top of Carroll's (1991) pyramid of CSR management, meaning that altruism causes highest favorability. Altruism is thus in theory more effective than legal and even moral or ethical behavior. The shortness of the case can be interpreted as logical fit towards the main message of not being responsible for the crisis. The fact that there were no terminations reactionary to the accusations is further evidence for the casualness that Mylan wants to portray.

The success of this communication strategy is however compromised by inconsistency. Suchman (1995) and Massey (2001) mention the essentiality of consistency in legitimation attempts. Discursive legitimation claims need to be consistent to each other. As described above, Mylan consequently sticks to the denial strategy, thus discursive consistency is fulfilled. Moreover, the discursive claims of the company need to be consistent with its actions. By stating innocence while agreeing on significant retributions, Mylan breaches with the required consistency. The legitimizing effect of altruism and commitment to society, values and norms might thus stay out.

The committed right-doer. In its crisis response press releases, Wells Fargo particularly emphasizes its commitment to customers, but also to its employees and local society. *Employee commitment* (Zimmerman & Zeitz, 2005), as well as commitment and *help to society* (Austin & Gaither, 2017) are both mentioned in the legitimation framework under the category of '*legitimation through values and norms*'. However, the herein and in other cases central theme of customer commitment is not recognized. After conducting the analysis, this seems surprising, however the thorough review of Suchman's (1995) classifications of legitimacy resulted in similar insight. As mentioned before (p. 30), the legitimation framework does cover legitimation strategies that could add to moral legitimacy and cognitive legitimacy, but not those that add to pragmatic legitimacy. '*Legitimation based on values and norms*' reflects the stakeholder perception that the company and its actions are broadly profitable for e.g. groups of the society. Care for employees and care for the society as communicated by Wells Fargo thus adds to moral legitimacy. As mentioned, the pragmatic legitimacy scope, the self-profit through a company and its actions, is not reflected in the framework. As the major part of the direct or indirect audience probably belongs to the stakeholder-group of (potential) customers, the theme of customer commitment then would belong to pragmatic legitimacy. Why self-interest or pragmatic legitimacy is not considered by any of the reviewed researchers that follow the discursive legitimacy approach cannot be answered.

Another core theme was the promise to "make it right" (e.g., Wells Fargo, #27, 28.11.2017). Like Volkswagen, this theme implies solutions, however instead of discursively

dealing with concrete solutions like described as a Volkswagen leitmotif, Wells Fargo mostly sticks to the proclamation of ‘activity’ which is formulated very generally and detached from any concrete measures. ‘Activity’ as a category of themes that include emotionally-loaded, vague phrases and spirit of optimism was found quite often within the cases. This might be due to the wide applicability of ‘hollow’ phrases. Though these themes do not contain any concrete commitment, they might still positively influence stakeholder perception and create legitimacy. Remarkably, these themes do create positive expectations without providing concrete demands. As no concrete measure is announced, no non-fulfillment can be lamented. This makes the theme favorable for legitimation in emotionally charged situations like crises. ‘Activity’ might not have been considered by the scholars that contributed to the legitimation framework as they did not investigate legitimation attempts in concrete and severe crisis situations like CSR crises.

The apologizing friend. Apologizing or communicating regret of the situation is another legitimacy-rising theme that emerged from the analysis. In the case of United Airlines, the frequent apology to several stakeholders served as a leitmotif of the crisis response strategy. Though this strategy is not reflected in the legitimation framework, it is established as a valid crisis response strategy, that positively influences audience perception of the company (Benoit, 1997). Especially in cases of CSR crises, where stakeholders perceive the company as responsible of wrongdoing, acceptance of responsibility, explanation (see Suchman, 1995) and apology might be the only safe response strategies. Apologies are likely even expected by the accusing stakeholders, as in common societal settings, the appropriate reaction to misbehavior would be to apologize. When companies aim to tie their bonds to society through what is referred to as ‘corporate citizenship’ – a strategy of Corporate Social Responsibility that aims to strengthen reputational assets through societal commitment – (Moon, Crane, & Matten, 2005) in cases of social misbehavior, they are expected to react by reestablishing socially correct behavior, which in the aftermath of a CSR crisis would be to apologize.

The ‘friend’ motif refers to the company slogans “Fly the Friendly Skies” (United, 2018a) and “We fly friendly” (United, 2018b). Communicating being a friend, as a term, is too specific to be interpreted as a legitimation theme. However, the term reflects stakeholder commitment or even *long-term interest in society* (Austin & Gaither, 2017) as established under the category ‘*legitimation based on values and norms*’ in the framework. The aim to be a friend portrays goodwill and compliance. Another reason why the theme could increase legitimacy is its connection to the established slogan, which might transfer recollections of

reputational assets from the company image to the specific crisis situation and serve as a bolster. This however requires a long-term corporate history of positive reputation and a cognitive linkage of the audience between the company's reputation and the slogan. On the other hand, the reference to be a friend could harm legitimacy. This might happen when audiences perceive the incident of injuring an innocent passenger and the claim to be a passenger's friend as inconsistent (see Massey, 2001; Suchman, 1995) – something that based on practical knowledge of the case and theoretical knowledge of stakeholder perceptions seems quite likely.

To concisely answer the first research question “*What patterns of legitimization can be found within CSR crisis cases?*” following insights were most remarkable: Though some specific occasions that were dealt with in particular press releases led to specific legitimization themes – for instance visible in the communication of Wells Fargo, where solely in the occasion of cancelled local partnerships local social commitment was emphasized – the patterns of legitimization were found to be strategically implied within the cases instead of intuitively utilized per single press release and its objective. The strategically chosen legitimization themes do not only recur a few times throughout the press releases but are intentionally utilized throughout the whole crisis communication in form of repetitive central legitimization themes, or legitimization leitmotifs. Thus, so far, the patterns of legitimization that were found within the cases indicated that legitimization is utilized following a consciously managed *holistic* approach.

4.3. RQ2: Shifts of Legitimation Based on the Progress of the Crisis

Whereas analysis guided by the first research question provided insights about the themes and patterns of legitimization that were visible in the different cases, the second research question suggests an analysis of legitimization under the premise that communication is not static and crisis communication strategies might thus develop and progress. The question thus implies analyzing whether a specific structure emerged from the legitimization chronology in the cases. Shifts of communication and their possible strategic relevance were reviewed as well as regularities of chronologic structures amongst the cases. Related theories of legitimacy research were reviewed to add understanding to these results.

Discursive phases of legitimation. Theory so far identified three phases of crisis – pre-crisis, acute crisis, and post-crisis – that logically follow each other, and specific crisis management strategies that align with these phases (see e.g. Coombs, 2010). Drawing from this understanding, the acute crisis phase was structured into further phases. This linear model consists of four steps that follow the triggering event. Firstly, companies observe the situation and gather information about the incident. Based on that, they interpret the situation and assign meaning to it. This interpretation is followed by the collective choice of an applicable strategy. The last step, dissemination, then describes the execution of the chosen actions. This step involves the communication with stakeholders (Hale, Dulek, & Hale, 2005). Though these theories do describe crisis response as a progressive or even linear model, they recognize crisis response from a broader management perspective. So far, crisis research was not able to constitute progressive models of crisis discourse, let alone progressive models of legitimation. Note that legitimacy as a process is mainly researched from a social perspective, i.e. as a social process (see Johnson, Dowd, & Ridgeway, 2006).

Yet, the results of the analysis indicate that the use of legitimating themes did change along with the chronology of the press releases of the cases. The tense that is used in the press releases to describe the company's activity can be recognized as an initial indicator for shifts i.e. the existence of phases. The first statements that were published relating to the crisis incident frequently contained phrases of future tense, such as “*We will proceed* with a sense of urgency but *will take* the time we need to conduct a thorough investigation. *We will then take* all appropriate actions” (Wells Fargo, #04, 27.09.2016). Later, the tense changes to the present, when updates of activities are mentioned, or the past, when achievements are expressed. To stay with the case of Wells Fargo, a later press release mentions “substantial actions it (the Group – ed. note), *has* already *taken* to strengthen oversight and increase accountability at all levels” (#17, 07.04.2017). Noticeably, the phase of past-tense, though including the communication of fulfillments of corrective actions, does not mark the end of the CSR crisis responses. Instead, legitimation efforts go on, while a strong future-orientation emerges: “Wells Fargo is a better bank today than it was a year ago. And next year, Wells Fargo *will be* a better bank than it is today” (Wells Fargo, #26, 03.10.2017).

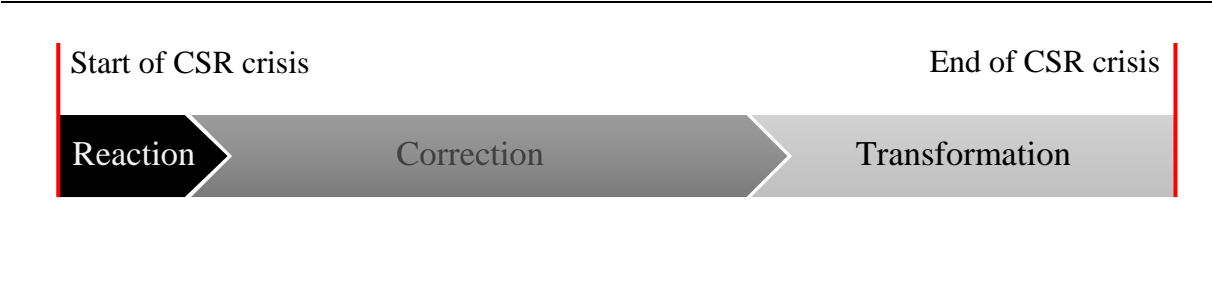
Not only the implied tense, but also the legitimation themes themselves do reflect these three phases (see figure 1). In the beginning of the case, the companies published initial statements that contained little informative content, and instead vague, emotional ‘announcement of activity’ that convey a sense of awakening and vibrant determination. Central themes of this first phase included ‘going to take action’, ‘investigate’, and ‘co-

operate’, as well as ‘make it right’ and ‘fix’. These themes reflect prompt, short-term, and solution-oriented, reactionary crisis communication. This *reaction phase* has a share of around 15% of the case. If the incident leads to resignations – as for example in the case of Barclays, Wells Fargo, and Volkswagen – those releases follow the reactionary phase and serve as the transition for the second phase.

The central legitimation themes of the second phase mainly refer to the planning, implementation, and progress of ‘corrective actions’, or actions that were initiated because of the crisis incident. Following Suchman’s (1995) argumentation, the reference of these ‘solutions’ has a legitimizing effect. Different from the first phase (as for instance visible through the ‘claim of activity’ theme), this *correction phase* contains significantly more concrete information. A typical example for the second phase is Volkswagen’s press release “Volkswagen starts recall of the first Golf model” (#36, 28.04.2016). With a share of about 50% of the case, this phase is the longest.

The third and last phase is initiated with the company’s realization that the pure correction of the crisis matter does not suffice to regain legitimacy and thus does not sufficiently solve the CSR crisis. At this point, the consideration that a regeneration of legitimacy requires restructuring (Suchman, 1995) becomes reasonable. A core legitimation theme of this phase is indeed ‘transformation/change’ (e.g. Volkswagens transformation to “Strategy 2025”), which does include structural changes or transformation as well as changes in long-term corporate objectives. This *transformation phase* occupies around 35% of the crisis.

Figure 1: Legitimation Phases Schema



Possible explanations for this structure so far are based on different (non-verified) assumptions that derive from considerations propped by the discussed theory and observations enriched by the conducted analysis:

(1) The CSR crisis, as a specific crisis type (see e.g. Du & Vieira, 2014) might require specific legitimation. The legitimation phases might hence align with possible CSR crisis

phases. As no research on CSR crisis evolution is available at this point, this assumption cannot be backed any further.

(2) Long-term, future-oriented legitimation claims ('transformation/change') might enable better success than middle-term, corrective legitimation claims ('corrective actions'), which might enable better success than short-term, vague-emotional legitimation claims ('announcement of activity' such as 'fix' and 'make right'). This claim would suggest that the phases do follow each other in that specific order, as the legitimation becomes stronger with each phase. Companies cannot skip the initial phases, because the stronger the legitimation, the higher the required resources (time, availability of information, concessions, et cetera). The vague, unspecific emotional claims of the first phase, for instance, neither require much invested time, nor much available information. As the initial crisis response must take place quickly, they can barely contain legitimation themes from any other than the first phase. The CSR crisis might be prolonged when the less resource-intensive legitimation themes do not successfully lead to a stakeholder perception of legitimacy. A communication of more committed-appearing "behavioural legitimation" – such as the change of business strategies – (Gronau, Schmidtke, & Biegoń, 2014, p. 15) then becomes necessary.

(3) Institutional legitimacy is more vital than actional legitimacy (Boyd, 2000). Regeneration of institutional legitimacy also requires stronger concessions than the regeneration of actional legitimacy. Crises that only cause public challenge of latter form of legitimacy might thus be solved after phase two, when the accusations (perceived wrong actions) are resolved by 'corrective actions'. Institutional legitimacy, which is more valuable, but also harder to regain, then might only be solved, when the accused institution – the company itself – undergoes change and transformation. Crises of institutional legitimacy would then only be solvable through the utilization of legitimation themes of phase three. What logically follows to this argument is the assumption that crises cases that were solvable in short time, hence with few legitimating concessions, can merely be categorized as cases of actional legitimacy crisis.

To concisely answer the second research question "*How does the utilization of legitimation mutate based on the evolution of the crisis?*" following insights were most remarkable: The utilization of legitimation did change throughout the crisis cases. Legitimation strategies followed three linear phases, which align with shifts in the utilization of tense. The first phase contains short-term-oriented acute reactions in form of emotional promises. The second phase contains middle-term-oriented corrective solutions with plenty

supporting information. The third phase contains long-term-oriented announcements of transformation and change. Boyd's (2000) considerations on actional and institutional legitimacy could serve as explanations, however in general, crisis communication and legitimacy research so far lack recognition of discursive processes of legitimation. The analysis revealed, that legitimation follows a *progressive* approach.

4.4. RQ3: Patterns of Legitimization Amongst CSR Crisis Cases

By answering the first research question, the individual utilized legitimation strategies and their relation to theory were reviewed. The second research question then allowed to analyze the phases of these legitimation strategies, possible explanations were discussed based on the insights of the cases and established theoretical considerations. So far, the results showed evidence that legitimation was used as a holistic strategy throughout the whole case which passes through different phases from start of the crisis to its solution. The third research question now adds another dimension to the research. With a comparison of the use of legitimation across cases, propositions whether legitimation is used similarly in CSR crises, independently from the underlying variances of the particular companies and cases, could be determined.

Multi-case legitimation themes. Next to the previously presented *structural regularities*, further *thematic regularities* were recognizable. These came in form of patterns of recurring themes, which did not only play a significant role within one, but within several cases. Though legitimating leitmotifs were employed with regard to individual corporate characteristics and crisis attributes, a significant amount of main legitimation themes which were used more generically was found across the cases.

Table 3 serves to outline these multi-case themes together with examples from the cases. Furthermore, each theme is joined by an overview that shows in which of the five cases the theme was found. For this purpose, each case was assigned with an abbreviation: B (Barclays), VW (Volkswagen), M (Mylan), WF (Wells Fargo), and UA (United Airlines). The greyed-out abbreviations stand for those cases in which the concerned theme was *not* used.

Table 3: Multi-Case Legitimation Themes

Themes	Examples
Announcement of Activity	<p>Take action <i>E.g.:</i> “we will take immediate, concrete action” (UA, #03, 13.04.2017) <i>Repeatedly utilized by:</i> B VW M WF UA</p> <p>Fix <i>E.g.:</i> “I am fully committed to fixing this issue” (WF, #03, 20.09.2016) <i>Repeatedly utilized by:</i> B VW M WF UA</p> <p>Make right <i>E.g.:</i> “We are totally committed to making things right” (VW, #26, 10.01.2016) <i>Repeatedly utilized by:</i> B VW M WF UA</p> <p>Steps <i>E.g.:</i> “the significant steps Mylan has taken” (M, #04, 07.10.2016) <i>Repeatedly utilized by:</i> B VW M WF UA</p>
Transparency	<p><i>E.g.:</i> “to be as transparent as possible in the process” (WF, #24, 22.08.2017) <i>Repeatedly utilized by:</i> B VW M WF UA</p>
Voluntarism	<p><i>E.g.:</i> “own voluntary review of accounts” (WF, #15, 28.03.2017) <i>Repeatedly utilized by:</i> B VW M WF UA</p>
Authorities	<p>Co-operation with Authorities <i>E.g.:</i> “Barclays has co-operated fully with the authorities in their investigations” (B, #02, 28.06.2012) <i>Repeatedly utilized by:</i> B VW M WF UA</p> <p>Authorities as Advocate <i>E.g.:</i> “the KBA has confirmed that this objective has been achieved in full.” (VW, #36, 28.04.2016) <i>Repeatedly utilized by:</i> B VW M WF UA</p>
Responsibility	<p><i>E.g.:</i> “we take full responsibility” (UA, #02, 11.04.2017) <i>Repeatedly utilized by:</i> B VW M WF UA</p>
Apology	<p><i>E.g.:</i> “We apologize to everyone who was harmed” (WF, #25, 31.08.2017) <i>Repeatedly utilized by:</i> B VW M WF UA</p>
Trust	<p><i>E.g.:</i> “We need to work every day to rebuild the trust that has been damaged” (B, #02, 28.06.2012) <i>Repeatedly utilized by:</i> B VW M WF UA</p>
Culture/Values	<p>Corporate Culture <i>E.g.:</i> “part of a broader transformation of Volkswagen's corporate culture” (VW, #53, 11.01.2017) <i>Repeatedly utilized by:</i> B VW M WF UA</p> <p>Values <i>E.g.:</i> “our policies got in the way of our values” (UA, #05, 27.04.2017) <i>Repeatedly utilized by:</i> B VW M WF UA</p>

<p>Stakeholder Commitment</p>	<p>Customers <i>E.g.:</i> “Barclays works hard every day to serve our customers” (B, #05, 03.07.2012) <i>Repeatedly utilized by:</i> B VW M WF UA</p> <p>Employees <i>E.g.:</i> “I have committed to [...] our employees that we are going to fix what’s broken” (UA, #02, 11.04.2017) <i>Repeatedly utilized by:</i> B VW M WF UA</p> <p>Community <i>E.g.:</i> “we support [...] the communities in which we live and work” (B, #05, 03.07.2012) <i>Repeatedly utilized by:</i> B VW M WF UA</p>
<p>Separation</p>	<p><i>E.g.:</i> “mistakes made by only a few” (VW, #03, 22.09.2015) <i>Repeatedly utilized by:</i> B VW M WF UA</p>
<p>Challenges/ External Pressure</p>	<p><i>E.g.:</i> “It was, as you will recall, a period of extraordinary turbulence and uncertainty” (B, #02, 28.06.2012) <i>Repeatedly utilized by:</i> B VW M WF UA</p>
<p>Good/Superior Corporation</p>	<p><i>E.g.:</i> “one of the strongest and most well-known financial services companies in the world” (WF, #08, 12.10.2016) <i>Repeatedly utilized by:</i> B VW M WF UA</p>
<p>Corrective Actions</p>	<p>Finances <i>E.g.:</i> “Mylan [...] has agreed to [...] a \$465 million settlement with [...] government agencies” (M, #04, 07.10.2016) <i>Repeatedly utilized by:</i> B VW M WF UA</p> <p>Personnel <i>E.g.:</i> “I am clearing the way for this fresh start with my resignation” (VW, #04, 23.09.2015) <i>Repeatedly utilized by:</i> B VW M WF UA</p> <p>Product <i>E.g.:</i> “launch of a generic version of EpiPen” (M, #04, 07.10.2016) <i>Repeatedly utilized by:</i> B VW M WF UA</p> <p>Structure <i>E.g.:</i> “improving our internal controls and systems” (B, #02, 28.06.2012) <i>Repeatedly utilized by:</i> B VW M WF UA</p>
<p>Transformation/ Change</p>	<p>Changed business strategy <i>E.g.:</i> “the process of developing a new strategy has commenced” (VW, #23, 10.12.2015) <i>Repeatedly utilized by:</i> B VW M WF UA</p> <p>Become a better company <i>E.g.:</i> “becoming a better, more customer-focused airline” (UA, #05, 27.04.2017) <i>Repeatedly utilized by:</i> B VW M WF UA</p>

Relation to theory. Different from the legitimation framework (table 1), which is drawn from established considerations on discursive legitimizing strategies, the table above (table 3) is purely drawn from the case analysis. Table 3 thus also lists themes such as ‘corrective action’. Like explained before, actions (and the public communication of them) can add to legitimacy as well (Gronau, et al., 2014; Suchman, 1995).

The most significant cross-case legitimation themes were ‘stakeholder commitment’ (primarily customer commitment) and ‘announcement of activity’. This significance is not only assigned to the themes because they were utilized in all five cases. They were also utilized frequently – several times per release and/or in many releases throughout the case – and prominently – e.g. in direct quotes from CEOs. Stakeholder commitment can be well-integrated into the category ‘*legitimation based on values and norms*’, as care for employees, for instance is recognized in both depictions. As mentioned before, customer commitment, as a strategy to gain pragmatic legitimacy (see Suchman, 1995), is not considered in the ‘*values and norms*’ category of the framework, which lists strategies that add to moral legitimacy. ‘Announcement of activity’ is not related to the framework either. This is because it integrates themes that do not relate to each other by content, but rather by style (vague promises, declarations *that* actions will be done rather than descriptions of *what* actions were done). What is here called ‘separation’ and ‘external pressure/challenges’ includes various strategies to shift blame (Benoit, 1997) or to provide excuses (Suchman, 1995). Though this was not integrated into the legitimation framework, Benoit sees it as a crisis response strategy, and Suchman even declares it as a proper strategy to regain legitimacy in face of a threat similar to a CSR crisis. Indeed, the purpose of separation in the analyzed cases seemed to be communication of constrained responsibility and preventability in a CSR crisis which is defined by a high stakeholder perception of corporate responsibility and self-infliction, thus preventability.

Despite these differences, there were also clear similarities between the framework and the themes that emerged from the analysis. Claims of normative legitimation – ‘transparency’, ‘voluntarism’, ‘responsibility’, ‘apology’, ‘trust’ and ‘culture/values’ – were very popular in the cases and mark an important sphere of the legitimization framework as well. CSR crises are defined as incidents of perceived corporate misbehavior relating to social values and norms. Consequently, it is reasonable to communicate compliance to social values and norms as a reaction to such crises.

A similarly popular utilization was found for the theme of ‘authorities’. These were recognized as external legitimizing sources in the framework (‘*legitimation based on*

authority). Generally, authorities can be well utilized as legitimators, because as third-parties their claims are perceived more trustworthy than companies' own claims. In cases of self-inflicted crises own claims of accomplishments might cause an even higher risk of stakeholder doubts. This might make legitimation based on authorities a particularly valuable strategy in CSR-crises.

Up to this point, the chapter merely described what legitimation strategies were found within the cases plus if and how they echoed the established strategies from the legitimation framework. This led to valid and valuable insights and consolidated the understanding of legitimation. Anyhow, to discuss potential explanations why some themes from the framework vice versa did not occur in the cases provides equal value.

'Legitimation based on history' was not found to be a popular theme within the cases. Mylan mentioned its past commitments, other companies only seldomly referred to past achievements of specific personnel. Possibly, as institutional legitimacy – i.e. the very existence of the company – is questioned, declarations of the institution's past become ineffective. Mylan denies responsibility and might thus not consider its institutional legitimacy to be threatened, which could be a reason why it does recoil less from corporate history related legitimation. Another part of the framework which was not used by any of the analyzed companies was cosmologically-based legitimation. Neither *'legitimation based on rationality'*, which implies communicating the incident that led to the crisis as something conclusively justifiable, nor *'legitimation based on normality'*, which implies communicating the behavior that led to the crisis as common, were used. Here as well, the type of crisis which the companies faced may have prevented them from deeming these strategies appropriate. The cases of fraud which Barclays, Volkswagen, and Wells Fargo perpetrated, for instance, are likely not convincingly justifiable by communicating them as essential or normal.

Recognizably, there are remarkable similarities as well as differences between the suggestions of possible legitimation strategies as presented in the framework and utilized legitimation as employed by the companies across the cases. Potentially, this is because legitimacy theories as integrated into the framework do not base on considerations of CSR crisis conditions. Overall, distinctions between theory and practice do not indicate errors of one or the other. As was aim of this research, different areas of research – in this case legitimacy, CSR, and crisis – were combined into one approach. The distinctions thus rather explain how a CSR crisis as a specific, severe legitimacy damaging occasion alters or directs the way legitimation is utilized.

To concisely answer the third research question “*What patterns of legitimization can be found among CSR crisis cases?*” following insights were most remarkable: The companies just shared one similarity that could influence legitimization – they all faced a CSR crisis. Other characteristics, such as branch, exact accusations of misconduct, course and scope of events, et cetera varied. Still, the cases shared remarkable similarities regarding the way legitimization was used. The most disseminated field of these multi-case legitimization themes was the portrayal of goodwill through reference to culture and values, stakeholder commitment and announcements of activity. The results from practice shared similarities with the theory in the areas of values and norms and authority. Differences were visible in two ways: On the one hand, the themes that derived from the analysis were not limited to discursive considerations, but also recognized reference to actions as method of legitimization. Thus, *some themes from the analysis are not included in the framework*. On the other hand, the framework does relate to a more general aim for legitimization – including the objectives to gain, maintain or regain actional and institutional legitimacy – whereas legitimization in the analysis was utilized to specifically regain institutional legitimacy that was harmed by CSR crises. Due to that, *some strategies from the framework were not visible in the cases*. Overall, the analysis of the third research question revealed that legitimization in the cases was not simply used individually per company, but that legitimization can be *overarching*.

4.5. Summary of Results

As expected on the base of the theoretical framework, CSR-related, i.e. value-related themes such as social commitment, transparency, and corporate culture, did occupy a respectable role in the legitimization aims. The expectation was that, to not only maintain but regain legitimacy (as CSR crises require for, see Suchman, 1995), the communicated effort must be higher than just solving the issue through corrective action. Considering Scott and Lane’s (2000) argumentation, corporate misbehavior will strengthen the legitimacy of stakeholder claims. Consequently, stakeholder expectations rise, and it will take more than would have been expected before the crisis to regain legitimacy. As a form of behavior that exceeds profitability and represents ‘doing more than what would be necessary’, CSR was expected to be a suitable legitimization theme. However, as described in the theoretical framework of this research, several researchers suggest, that the positive effect of CSR does not apply to CSR crises (Sohn & Lariscy, 2014; Coombs & Holladay, 2015). How the companies’ value-based claims were perceived by the audiences could not be observed within the limits of this research, alas.

The Mylan case, which can be categorized as a case of ‘denial’ – a consciously chosen crisis response strategy (Benoit, 1997) – significantly differs from the other cases. This can be reasoned by the fact that the denial strategy is atypical for crises with a high perceived company responsibility, which CSR crises belong to (Sohn & Lariscy, 2014). The difference between Mylan’s crisis communication, which represents a crisis communication strategy, from the other cases, which share significant similarities to each other, allows for a classification of legitimation as a unique crisis response strategy, which is equal in rank to other established crisis response strategies.

Table 4: Types of use of legitimation

Research Question	Use of legitimation
RQ1: Patterns <i>within</i> cases	Legitimation was used holistically
RQ2: Mutation <i>along</i> cases	Legitimation was used progressively
RQ3: Patterns <i>among</i> cases	Legitimation was used overarchingly

As the thorough review of the cases showed, *legitimation is utilized in a rather holistic, progressive, and overarching way* (table 4). This recognition does further support the suggestion of legitimization as a distinct crisis communication strategy: Similar legitimation themes are used throughout the press releases and hence form a holistic communication approach. The particular conditions of the company itself, as well as the crisis conditions were found to have minor impact on the utilization of legitimation themes in the reviewed cases. Legitimation did cover different phases which formed a fix scheme across the analyzed cases. Furthermore, the same legitimation themes were found across cases, regardless of the diverse accusations or company branches covered in the analysis material. It is, however, important to note that these considerations only apply to CSR crisis cases. This means that legitimation might be utilized differently in cases of lower perceived company responsibility, or self-claimed low responsibility (see Mylan). Arguably, the successful utilization of rationalization (and separation) requires conditions of low crisis responsibility, e.g., natural disasters.

The main research question – “*How do companies maintain or regain their legitimacy in the face of a CSR crisis?*” – can be answered as follows: Companies that face CSR crises (and accept the implied perception of high responsibility) do communicate similarly to each other, regardless of external conditions. This communication can be interpreted as a unique crisis response strategy, a ‘regeneration of institutional legitimacy’ strategy.

The established legitimation framework did not completely align with legitimation as utilized in the cases. This is because the underlying research that formed the framework was narrowed to discursive strategies and did not focus on legitimation in connection with the specific conditions of a CSR crisis. The differences can hence support the idea that a CSR crisis, as a specific incident (e.g. Coombs & Holladay, 2015; Sohn & Lariscy, 2014), induces a specific response strategy. This strategy aims to restore particularly institutional legitimacy and differs from other legitimation strategies with objective to gain, maintain, or regain actional legitimacy or gain or maintain institutional legitimacy.

5. Conclusion

5.1. Conceptual Implications

Through the comparison of the five cases, several salient results were found, which together lead to a main conceptual conclusion.

Firstly, though press releases are majorly defined as tools to carry information (e.g., Johnson & Haythornthwaite, 1989), the main themes of the analyzed cases rather contribute to emotional reactions than being informative. The analyzed press releases could hence be treated as specific tools of crisis response which differ from other press releases. Lassen (2006, p. 506) argues, that press releases can “carry a variety of rhetorical objectives”, legitimacy thus could be the objective of ‘legitimation press releases’.

Secondly, though the company branch, scope of the crisis and concrete solutions significantly differ from each other amongst the cases, they typically follow the same communicative structure and share a significant number of similar themes (table 3). One can thus infer that, maybe, similar types of crisis lead to similar communication style within press releases, independently from above-mentioned factors such as branch or crisis scope. As all examined cases were defined as CSR crises, possibly, this particular type of crisis leads to a particular ‘CSR crisis-communication’ that differs from crisis communication strategies of other crisis types. The scope of this did not allow for a substantiation of this notion. A trial comparative content analysis between crisis-communication aiming at solving a CSR crisis and crisis-communication aiming at solving miscellaneous crisis types would offer more insight regarding this hypothesis.

Thirdly, the cross-case legitimation themes possess substantial parallels to both: the legitimacy framework that was designed as part of this research, and crisis response strategies (see Benoit, 1997). The analysis shows that the different research fields clearly relate to each other, serving as a connecting intermediate. Hence, this work succeeded in its conceptual aim to connect the spheres of legitimacy and crisis communication, and to analyze them as an interdependent constellation.

The main conceptual conclusion is based on these considerations: (1) The crisis-response press releases are likely distinct from common press releases. (2) The CSR crisis response is probably distinct from other crisis response strategies. (3) The CSR crisis responses are noticeable close to legitimation strategies. Thus, CSR crises are specific incidents that – consciously or not – are dealt with through specific crisis responses, that

indeed focus on the utilization of legitimation as a strategy. At an earlier point, this was referred to as ‘regeneration of institutional legitimacy’ strategy. As this research revealed, the themes do not occur as separate strategies, but together, making ‘legitimation’ a broader crisis communication strategy, comparable to the conceptualization of legitimation strategy as used by Gronau, Schmidtke, and Biegoń (2014).

5.2. Practical Implications

Though the research was limited to an analysis of how legitimation was utilized, with knowledge of the outcome of each crisis, it will serve to classify which communication was successful. The fact that four of the five examined cases did utilize a similar crisis response strategy which made central use of legitimation, indicates that severe crises of self-initiated misbehavior indeed require legitimation. This research has a sense-making effect, as it was able to categorize real-scenario crisis communication into comprehensible, applicable concepts. These concepts can be implied into (CSR-)crisis communication guides, as the research can be transformed into Do’s and Don’ts relatively easily. The distinction between themes that fit legitimation strategies in case of a CSR crisis, and themes that do not, might retrospectively add to a better understanding why public reaction in some cases was negative, giving theory-based, valid explanations. Companies that face a CSR crisis cannot only better understand that legitimation is necessary, but also how a legitimation strategy can be constructed, and which themes of legitimation are fit the crisis.

Further, this research promotes awareness of ‘legitimation’, how it is utilized, and particularly how it differs from other crisis response strategies. This is an important aspect of the work, as legitimation in theory is considered existentially important (Boyd, 2000), whereas it is not properly distinguished from reputation in practice and thus in many situations not consciously managed.

5.3. Limitations

The substances and conceptual implications presented above base on conclusions of the analysis. As the analysis was conducted amongst a narrow number of cases, which can neither properly represent the extensive list of possible misconduct or accusations, nor the extensive list of possible external conditions, the constructed theories, or suggestions for alteration of established theories need to be interpreted as tendencies. By no means does this

research claim generalizability – rather it aims to serve as a groundwork that sets different theoretical concepts into context to point towards new options or perspectives for conceptualization. This means, that the conclusions of this work require consolidation in form of further research (see below).

The progress of the communication during the crisis closely depends on external influence, particularly public reaction. This can be seen, for instance, in the United Airlines case, where in a later release, the company apologized for the diction used in the initial press release. However, as the scope of this research does not include the analysis of interexchange between company and public opinion, the notions as to why shifts in the communication occurred, cannot be answered evidently.

Besides public reaction, several other factors, such as the company's age or media coverage, can influence how and what is communicated in crisis responses (see Rhee & Valdez, 2009). Punishment by third-party authorities, for instance, can cause a rise of public visibility and thus impede legitimation (ibid.). Neither how such external conditions influence stakeholder perception, nor how the stakeholder perception or reaction influence the communication could be considered in this work – instead each item was regarded under the supposition that the affected company could freely communicate, merely regarding how it aims to be perceived by the audience. The research completely focused on the analysis of discursive corporate crisis communication with the affected company as sender.

Given this restriction, it was not possible to examine if the legitimation themes that were utilized by the companies were effective to achieve legitimacy. If for instance 'separation' hinders perceived legitimacy thus solely bases on theoretical considerations: Scott and Lane (2000), for instance, suggest that the organization will react more attentively towards stakeholder claims, the more legitimate it perceives them. Furthermore, the more legitimate stakeholders perceive their own claims, the more they criticize organizations whose values do not fit theirs. Same as stakeholders, organizations can evaluate themselves as legitimate. Thus, if the organization perceives itself and its behavior as more legitimate than the stakeholder claims (or the stakeholder claims as not urgent, ibid.), it might feel less need to legitimate itself and rather use separation themes or the denial strategy, as for example Mylan did. Legitimacy can also come in different forms, such as legal legitimacy and moral legitimacy (Suddaby, Bitectine, & Haack, 2015). Mylan might have referred to its behavior as legally legitimate and thus utilized denial, whereas the company's stakeholders might have perceived a morally illegitimate behavior. The saying 'what is legal is not always right' well

describes this contradiction. Suggestively, the rise of CSR demands might reflect the strengthened role of moral legitimacy demands.

5.4. Suggestions for Further Research

The crisis communication of the five examined companies showed clear legitimating strategies, but also the deliberate use of crisis responses that discursive theory so far does not apprehend as legitimation strategies. Possibly, these themes do not fit into the legitimation framework as they do not add to perceived legitimacy of the audience. An experimental setup could examine if e.g. ‘separation’ themes increase the perception of a company being legitimate. Such research would be necessary to validly assert if the legitimation framework should be adjusted to fit the specific criteria of CSR crisis legitimation.

Further quantitative empirical research about the possible natural evolution of a CSR crisis would answer the question whether the progress of the legitimation strategy depends on/aligns with this specific crisis type, or if the progress of the legitimation strategy relates to the success of the communication. Insights on this matter would increase knowledge about the relation between CSR crises – as cases of perceived misbehavior according to values and social norms – and legitimation – as a strategy to secure or restore perceived correct behavior according to values and social norms. This is valuable, as the work on the relationship of both concepts is very limited so far. Though extensive research on CSR crises exists (e.g., Coombs & Holladay, 2015; Sohn & Lariscy, 2014), it mainly focuses on the distinction of this crisis type from others and, in line with that, the definition and explanation of CSR crisis characteristics. Examinations on the evolution of crises or crisis phases in general is limited. Such an examination of the particular CSR crisis, so far, is unknown.

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Appendix A: List of Analysed Press Releases

Barclays – Fix of lending rates – 2012

Item No.	Date	Title Source
#1	Jun 27, 2012	<p>“Barclays Bank PLC Settlement with Authorities”</p> <p>http://newsroom.barclays.com/r/2305/barclays_bank_plc_settlement_with_authorities</p>
#2	Jun 28, 2012	<p>“Letter from Bob Diamond, Barclays Chief Executive”</p> <p>http://newsroom.barclays.com/r/2306/letter_from_bob_diamond_barclays_chief_executive</p>
#3	Jun 29, 2012	<p>“Statement on FSA Announcement Regarding Interest Rate Hedging Products”</p> <p>http://newsroom.barclays.com/r/2308/statement_on_fsa_announcement_regarding_interest_rate</p>
#4	Jul 2, 2012	<p>“Board changes”</p> <p>http://newsroom.barclays.com/r/2309/board_changes</p>
#5	Jul 3, 2012	<p>“Board changes”</p> <p>http://newsroom.barclays.com/r/2311/board_changes</p>
#6	Jul 3, 2012	<p>“Management changes”</p> <p>http://newsroom.barclays.com/r/2313/management_changes</p>
#7	Jul 10, 2012	<p>“Agreement on matters arising subsequent to Bob Diamond’s resignation”</p> <p>http://newsroom.barclays.com/r/2317/agreement_on_matters_arising_subsequent_to_bob_diamond_s</p>
#8	Jul 24, 2012	<p>“Anthony Salz to lead independent business practices review”</p>

		http://newsroom.barclays.com/r/2325/anthony_salz_to_lead_independent_business_practices_review
#9	Aug 9, 2012	<p>“Sir David Walker appointed to succeed Marcus Agius as Chairman”</p> <p>http://newsroom.barclays.com/r/2347/sir_david_walker_appointed_to_succeed_marcus_agius_as</p>
#10	Aug 15, 2012	<p>“Barclays reduces mortgage rates”</p> <p>http://newsroom.barclays.com/r/2349/barclays_reduces_mortgage_rates</p>
#11	Aug 29, 2012	<p>“Russell Collins and Boston Consulting Group appointed to support Salz Review”</p> <p>http://newsroom.barclays.com/r/2359/russell_collins_and_boston_consulting_group_appointed_to</p>
#12	Oct 2, 2012	<p>“Barclays cuts rates to help borrowers escape from other lenders' Standard Variable Rate hikes”</p> <p>http://newsroom.barclays.com/r/2396/barclays_cuts_rates_to_help_borrowers_escape_from_other</p>
#13	Oct 2, 2012	<p>“Barclays announces changes to its Executive Committee”</p> <p>http://newsroom.barclays.com/r/2397/barclays_announces_changes_to_its_executive_committee</p>

VW – Emission Scandal – 2015

Item No.	Date	Title Source
#1	Sep 20, 2015	<p>“Statement of Prof. Dr. Martin Winterkorn, CEO of Volkswagen AG:”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Statement-of-Prof-Dr-Martin-Winterkorn-CEO-of-Volkswagen-AG/view/2709406/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#2	Sep 22, 2015	<p>“Volkswagen AG has issued the following information:”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-AG-has-issued-the-following-information/view/2715181/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#3	Sep 22, 2015	<p>“Text: video statement of the CEO of Volkswagen AG”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Text-video-statement-of-the-CEO-of-Volkswagen-AG/view/2718956/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#4	Sep 23, 2015	<p>“Statement by Prof. Dr. Winterkorn”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Statement-by-Prof-Dr-Winterkorn/view/2721302/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#5	Sep 23, 2015	<p>“Statement from the Executive Committee of Volkswagen AG's Supervisory Board”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Statement-from-the-Executive-Committee-of-Volkswagen-AGs-Supervisory-Board/view/2721544/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#6	Sep 25, 2015	<p>“Matthias Müller appointed CEO of the Volkswagen Group”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Matthias-Mller-appointed-CEO-of-the-Volkswagen-</p>

		Group/view/2726856/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ
#7	Sep 25, 2015	<p>“The Volkswagen Group is restructuring: Supervisory Board passes resolutions for new organization”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/The-Volkswagen-Group-is-restructuring-Supervisory-Board-passes-resolutions-for-new-organization/view/2726863/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#8	Sep 25, 2015	<p>“Statement by the Supervisory Board of Volkswagen AG”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Statement-by-the-Supervisory-Board-of-Volkswagen-AG/view/2726870/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#9	Sep 25, 2015	<p>“Dr. Herbert Diess, CEO of the Volkswagen Passenger Cars brand, explains: “We are working at full speed on a solution.””</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Dr-Herbert-Diess-CEO-of-the-Volkswagen-Passenger-Cars-brand-explains-We-are-working-at-full-speed-on-a-solution/view/2727405/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#10	Sep 29, 2015	<p>“Volkswagen AG announces action plan to update diesel vehicles with EA 189 EU5 engines”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-AG-announces-action-plan-to-update-diesel-vehicles-with-EA-189-EU5-engines/view/2741113/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#11	Oct 01, 2015	<p>“Statement from the Executive Committee of Volkswagen AG's Supervisory Board following its meeting on September 30, 2015”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Statement-from-the-Executive-Committee-of-Volkswagen-AGs-Supervisory-Board-following-its-meeting-on-September-30-2015/view/2764570/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#12	Oct 6, 2015	“Matthias Müller: “We will overcome this crisis””

		<p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Matthias-Mller-We-will-overcome-this-crisis/view/2778966/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#13	Oct 7, 2015	<p>“Statement from the Supervisory Board of Volkswagen AG”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Statement-from-the-Supervisory-Board-of-Volkswagen-AG/view/2786301/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#14	Oct 13, 2015	<p>“Volkswagen Brand Board of Management takes strategic decisions”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-Brand-Board-of-Management-takes-strategic-decisions/view/2797663/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#15	Oct 15, 2015	<p>“Federal Motor Transport Authority (KBA) decides on recall for affected EA 189 diesel vehicles”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Federal-Motor-Transport-Authority-KBA-decides-on-recall-for-affected-EA-189-diesel-vehicles/view/2803458/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#16	Oct 22, 2015	<p>“Volkswagen confirms: EA288 engines designed for EU5 and EU6 are not affected”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-confirms-EA288-engines-designed-for-EU5-and-EU6-are-not-affected/view/2827451/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#17	Oct 28, 2015	<p>“Matthias Müller unveils next steps for the Volkswagen Group”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Matthias-Mller-unveils-next-steps-for-the-Volkswagen-Group/view/2838969/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#18	Nov 2, 2015	<p>“Statement on the announcement by the United States Environmental Protection Agency (EPA)”</p>

		<p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Statement-on-the-announcement-by-the-United-States-Environmental-Protection-Agency-EPA/view/2853105/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#19	Nov 3, 2015	<p>“Statement of the Supervisory Board on irregularities in CO2 levels”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Statement-of-the-Supervisory-Board-on-irregularities-in-CO2-levels/view/2857016/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#20	Nov 3, 2015	<p>“Clarification moving forward: internal investigations at Volkswagen identify irregularities in CO2 levels”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Clarification-moving-forward-internal-investigations-at-Volkswagen-identify-irregularities-in-CO2-levels/view/2857367/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#21	Nov 9, 2015	<p>“Group Board of Management and Works Council agree on joint steps”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Group-Board-of-Management-and-Works-Council-agree-on-joint-steps/view/2873572/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#22	Nov 25, 2015	<p>“Technical measures for the EA 189 diesel engines affected presented to the German Federal Motor Transport Authority”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Technical-measures-for-the-EA-189-diesel-engines-affected-presented-to-the-German-Federal-Motor-Transport-Authority/view/2925586/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#23	Dec 10, 2015	<p>“Volkswagen making good progress with its investigation, technical solutions, and Group realignment”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-making-good-progress-with-its-investigation-technical-solutions-and-Group-realignment/view/2973818/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>

#24	Dec 16, 2015	<p>“NOx issue: customers are being informed, implementation is starting”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/NOx-issue-customers-are-being-informed-implementation-is-starting/view/2995379/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#25	Jan 08, 2016	<p>“Volkswagen Group delivers 9.93 million vehicles in 2015”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-Group-delivers-993million-vehicles-in-2015/view/3055390/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#26	Jan 10, 2016	<p>“Matthias Müller: "The USA is and remains a core market for the Volkswagen Group."”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Matthias-Müller-The-USA-is-and-remains-a-core-market-for-the-Volkswagen-Group/view/3061225/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#27	Feb 02, 2016	<p>“Volkswagen starts implementing technical measures for EA189 diesel engines in Europe”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-starts-implementing-technical-measures-for-EA189-diesel-engines-in-Europe/view/3148272/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#28	Feb 05, 2016	<p>“Volkswagen delays the reporting of the Annual Results and the Annual General Meeting”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-delays-the-reporting-of-the-Annual-Results-and-the-Annual-General-Meeting/view/3163613/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#29	Feb 18, 2016	<p>“Volkswagen making progress as planned with first wave of technical measures for diesel engines”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-making-progress-as-planned-with-first-wave-of-technical-measures-for-diesel-</p>

		engines/view/3205983/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ
#30	Mar 02, 2016	<p>“Volkswagen considers shareholder lawsuit to be without merit”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-considers-shareholder-lawsuit-to-be-without-merit/view/3259846/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#31	Apr 21, 2016	<p>“Volkswagen has reached an agreement in principle with the US authorities”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-has-reached-an-agreement-in-principle-with-the-US-authorities/view/3407637/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#32	Apr 22, 2016	<p>“Statement by Volkswagen AG regarding the status of the comprehensive investigation in connection with the diesel matter”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Statement-by-Volkswagen-AG-regarding-the-status-of-the-comprehensive-investigation-in-connection-with-the-diesel-matter/view/3414210/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#33	Apr 22, 2016	<p>“Significant reduction in variable Board of Management remuneration”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Significant-reduction-in-variable-Board-of-Management-remuneration/view/3414224/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#34	Apr 22, 2016	<p>“Volkswagen Reports Robust Operations in Fiscal Year 2015 – Special Items Impact on Result for the Year”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-Reports-Robust-Operations-in-Fiscal-Year-2015-Special-Items-Impact-on-Result-for-the-Year/view/3414161/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#35	Apr 28, 2016	<p>“Volkswagen is making good progress with the realignment of the Group”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-is-making-good-progress-with-the-realignment-of-the-</p>

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#36	Apr 28, 2016	<p>“Volkswagen starts recall of the first Golf model”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-starts-recall-of-the-first-Golf-model/view/3454816/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#37	May 11, 2016	<p>“Volkswagen proposes resolutions ratifying the actions of all members of the Board of Management and of the Supervisory Board at the Annual General Meeting”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-proposes-resolutions-ratifying-the-actions-of-all-members-of-the-Board-of-Management-and-of-the-Supervisory-Board-at-the-Annual-General-Meeting/view/3504049/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#38	Jun 03, 2016	<p>“Retrofit of Volkswagen Passat, CC and Eos begins”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Retrofit-of-Volkswagen-Passat-CC-and-Eos-begins/view/3626848/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#39	Jun 08, 2016	<p>“Approval of the technical solutions for around 1.1 million further Group vehicles confirmed by the Federal Motor Transport Authority”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Approval-of-the-technical-solutions-for-around-11-million-further-Group-vehicles-confirmed-by-the-Federal-Motor-Transport-Authority/view/3641333/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#40	Jun 20, 2016	<p>“Statement by Volkswagen AG on the press release from the Braunschweig public prosecution service”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Statement-by-Volkswagen-AG-on-the-press-release-from-the-Braunschweig-public-prosecution-service/view/3703880/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#41	Jun 22, 2016	<p>“Matthias Müller: We have launched the biggest change process in Volkswagen's history”</p>

		<p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Matthias-Miller-We-have-launched-the-biggest-change-process-in-Volkswagens-history/view/3710903/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#42	Jun 28, 2016	<p>“Volkswagen Reaches Settlement Agreements with U.S. Federal Regulators, Private Plaintiffs and 44 U.S. States on TDI Diesel Engine Vehicles”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-Reaches-Settlement-Agreements-with-US-Federal-Regulators-Private-Plaintiffs-and-44-US-States-on-TDI-Diesel-Engine-Vehicles/view/3733593/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#43	Jul 26, 2016	<p>“Volkswagen announces preliminary approval of 2.0L TDI settlement program in the United States”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-announces-preliminary-approval-of-20L-TDI-settlement-program-in-the-United-States/view/3795065/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#44	Aug 14, 2016	<p>“Volkswagen receives go-ahead from the Federal Motor Transport Authority for the modification of models with the 1.2-litre EA189 TDI engine”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-receives-go-ahead-from-the-Federal-Motor-Transport-Authority-for-the-modification-of-models-with-the-12-litre-EA189-TDI-engine/view/3848411/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#45	Oct 25, 2016	<p>“Volkswagen obtains final approval of 2.0L TDI settlement program in the United States”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-obtains-final-approval-of-20L-TDI-settlement-program-in-the-United-States/view/4124615/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#46	Oct 27, 2016	<p>“Volkswagen Group reports solid earnings in period to September”</p>

		https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-Group-reports-solid-earnings-in-period-to-September/view/4135138/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ
#47	Nov 4, 2016	<p>“Volkswagen receives go-ahead from the Federal Motor Transport Authority for the modification of models with the 1.6-litre EA 189 TDI engine”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-receives-go-ahead-from-the-Federal-Motor-Transport-Authority-for-the-modification-of-models-with-the-16-litre-EA189-TDI-engine/view/4171108/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#48	Nov 6, 2016	<p>“Statement by Volkswagen AG on the investigation by the Braunschweig public prosecutor's office”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Statement-by-Volkswagen-AG-on-the-investigation-by-the-Braunschweig-public-prosecutors-office/view/4181051/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#49	Nov 18, 2016	<p>“Volkswagen Group: Investment planning sets the course for digital transformation and "Strategy 2025””</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-Group-Investment-planning-sets-the-course-for-digital-transformation-and-Strategy-2025/view/4248023/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#50	Dec 20, 2016	<p>“Volkswagen reaches agreement with U.S. environmental regulators to resolve civil claims related to 3.0L TDI V6 diesel engine vehicles in the United States”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-reaches-agreement-with-US-environmental-regulators-to-resolve-civil-claims-related-to-30L-TDI-V6-diesel-engine-vehicles-in-the-United-States/view/4348337/695c350828ea471a4eee72381b5ec2a2?p_p_auth=QC0qH5qZ</p>
#51	Dec 21, 2016	<p>“Volkswagen Group receives all approvals from German Federal Motor Transport Authority (KBA) for modifications of TDI engines”</p>

		https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-Group-receives-all-approvals-from-German-Federal-Motor-Transport-Authority-KBA-for-modifications-of-TDI-engines/view/4364044/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ
#52	Jan 10, 2017	<p>“Volkswagen AG published ad hoc announcement”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-AG-published-ad-hoc-announcement/view/4450115/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#53	Jan 11, 2017	<p>“Volkswagen reaches settlements with U.S. government”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-reaches-settlements-with-US-government/view/4455919/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#54	Jan 26, 2017	<p>“Dr. Christine Hohmann-Dennhardt to leave the Volkswagen Group Board of Management by mutual agreement – Hiltrud Werner appointed as successor”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Dr-Christine-Hohmann-Dennhardt-to-leave-the-Volkswagen-Group-Board-of-Management-by-mutual-agreement--Hiltrud-Werner-appointed-as-successor/view/4494649/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#55	Feb 01, 2017	<p>“Volkswagen reaches settlement agreements with private plaintiffs and U.S. Federal Trade Commission on 3.0L TDI V6 vehicles in the United States”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-reaches-settlement-agreements-with-private-plaintiffs-and-US-Federal-Trade-Commission-on-30L-TDI-V6-vehicles-in-the-United-States/view/4522911/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#56	Feb 08, 2017	<p>“Statement by the Supervisory Board of Volkswagen AG”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Statement-by-the-Supervisory-Board-of-Volkswagen-AG/view/4535857/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>

#57	Feb 23, 2017	<p>“Volkswagen Group making good progress in its retrofit campaign for diesel models”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-Group-making-good-progress-in-its-retrofit-campaign-for-diesel-models/view/4611654/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#58	Mar 28, 2017	<p>“Volkswagen Supervisory Board proposes resolutions ratifying the actions of all members of the Board of Management and of the Supervisory Board at the Annual General Meeting”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-Supervisory-Board-proposes-resolutions-ratifying-the-actions-of-all-members-of-the-Board-of-Management-and-of-the-Supervisory-Board-at-the-Annual-General-Meeting/view/4788362/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#59	May 17, 2017	<p>“Volkswagen obtains final approval of 3.0L TDI V6 settlement in the United States”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-obtains-final-approval-of-30L-TDI-V6-settlement-in-the-United-States/view/5010772/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#60	Sep 29, 2017	<p>“Volkswagen Group increases Provision for Recall Actions in North America”</p> <p>https://www.volkswagen-media-services.com/en/detailpage/-/detail/Volkswagen-Group-increases-Provision-for-Recall-Actions-in-North-America/view/5677755/69b97805cd0a97185b940cf096fb4a34?p_p_auth=QC0qH5qZ</p>
#61	Oct 27, 2017	<p>“Volkswagen Group continues its profitable growth – solid nine-month figures”</p> <p>https://www.volkswagen-media-services.com/en/presstexte/-/search/Presstext-Unternehmen-Informationen-zur-Diesel-Thematik/search/80916_81196_2847594?p_p_auth=Qkl6hxqQ&_searchportlet_WAR_vwmsportlet_start=60&_searchportlet_WAR_vwmsportlet_resultsView=0&_searchportlet_WAR_vwmsportlet_sort=1</p>

Mylan – Prize Rise EpiPen – 2016

Item No.	Date	Title Source
#1	Aug 22, 2016	<p>“Mylan's Commitment to EpiPen® (epinephrine injection, USP) Auto-Injector Access”</p> <p>http://newsroom.mylan.com/access</p>
#2	Aug 25, 2016	<p>“Mylan Taking Immediate Action to Further Enhance Access to EpiPen® (Epinephrine Injection, USP) Auto-Injector”</p> <p>http://newsroom.mylan.com/2016-08-25-Mylan-Taking-Immediate-Action-to-Further-Enhance-Access-to-EpiPen-Epinephrine-Injection-USP-Auto-Injector</p>
#3	Aug 29, 2016	<p>“Mylan to Launch First Generic to EpiPen® Auto-Injector at a List Price of \$300 per Two-Pack Carton, a More than 50% Discount to the Brand Product”</p> <p>http://newsroom.mylan.com/2016-08-29-Mylan-to-Launch-First-Generic-to-EpiPen-Auto-Injector-at-a-List-Price-of-300-per-Two-Pack-Carton-a-More-than-50-Discount-to-the-Brand-Product</p>
#4	Oct 7, 2016	<p>“Mylan Agrees to Settlement on Medicaid Rebate Classification for EpiPen® Auto-Injector”</p> <p>http://newsroom.mylan.com/2016-10-07-Mylan-Agrees-to-Settlement-on-Medicaid-Rebate-Classification-for-EpiPen-Auto-Injector</p>

Wells Fargo – Fake Accounts – 2016

Item No.	Date	Title Source
#1	Sep 8, 2016	<p>“Wells Fargo Issues Statement on Agreements Related to Sales Practices”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-issues-statement-agreements-related-sales</p>
#2	Sep 13, 2016	<p>“Wells Fargo to Eliminate Product Sales Goals for Retail Bankers”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-eliminate-product-sales-goals-retail-bankers</p>
#3	Sep 20, 2016	<p>“Wells Fargo Chairman and CEO John Stumpf Outlines a Series of New Actions to Strengthen Culture and Rebuild Trust of Customers and Team Members at Senate Banking Committee Hearing”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-chairman-and-ceo-john-stumpf-outlines-series-new</p>
#4	Sep 27, 2016	<p>“Independent Directors of Wells Fargo Conducting Investigation of Retail Banking Sales Practices and Related Matters”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/independent-directors-wells-fargo-conducting-investigation</p>
#5	Sep 29, 2016	<p>“Wells Fargo Chairman and CEO John Stumpf Provides an Update on Actions to Address Wrongful Sales Practices in the Company’s Retail Bank”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-chairman-and-ceo-john-stumpf-provides-update</p>
#6	Oct 5, 2016	<p>“Wells Fargo Media Statement Regarding Chicago City Council Ordinance”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-media-statement-regarding-chicago-city-council</p>
#7	Oct 7, 2016	<p>“Wells Fargo Media Statement Regarding City of Seattle Municipal Light and Power Revenue Bonds Facility”</p>

		<p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-media-statement-regarding-city-seattle-municipal</p>
#8	Oct 12, 2016	<p>“Wells Fargo Chairman, CEO John Stumpf Retires; Board of Directors Elects Tim Sloan CEO, Director; Appoints Lead Director Stephen Sanger Chairman, Director Elizabeth Duke Vice Chair”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-chairman-ceo-john-stumpf-retires-board-directors</p>
#9	Oct 14, 2016	<p>“Wells Fargo Statement Regarding Ohio Gov. John Kasich’s Oct. 14 Announcement”</p> <p>https://newsroom.wf.com/press-release/community-banking-and-small-business/wells-fargo-statement-regarding-ohio-gov-john</p>
#10	Dec 1, 2016	<p>“Wells Fargo Amends By-Laws to Require Separation of Chairman and CEO Roles”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-amends-laws-require-separation-chairman-and-ceo</p>
#11	Feb 20, 2017	<p>“Wells Fargo Names Two New Independent Directors”</p> <p>https://newsroom.wf.com/press-release/wells-fargo-names-two-new-independent-directors</p>
#12	Mar 1, 2017	<p>“Wells Fargo Announces Executive Compensation Actions to Promote Accountability”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-announces-executive-compensation-actions-promote</p>
#13	Mar 21, 2017	<p>“Wells Fargo CEO Tim Sloan Announces Six New Long-Term Goals and Provides Update on Rebuilding Trust Actions”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-ceo-tim-sloan-announces-six-new-long-term-goals</p>
#14	Mar 28, 2017	<p>“Wells Fargo Announces Community Reinvestment Act Rating”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-announces-community-reinvestment-act-rating</p>

#15	Mar 28, 2017	<p>“Wells Fargo Announces Agreement in Principle to Settle Class Action Lawsuit Regarding Retail Sales Practices”</p> <p>https://newsroom.wf.com/press-release/wells-fargo-announces-agreement-principle-settle-class-action-lawsuit-regarding</p>
#16	Apr 4, 2017	<p>“Wells Fargo Reiterates Commitment to Building a Better Bank with Open Letter to Customers”</p> <p>https://newsroom.wf.com/press-release/wells-fargo-reiterates-commitment-building-better-bank-open-letter-customers</p>
#17	Apr 7, 2017	<p>“Wells Fargo Board of Directors Issues Statement on ISS Report”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-board-directors-issues-statement-iss-report</p>
#18	Apr 10, 2017	<p>“Wells Fargo Board Releases Findings of Independent Investigation of Retail Banking Sales Practices and Related Matters”</p> <p>https://newsroom.wf.com/press-release/community-banking-and-small-business/wells-fargo-board-releases-findings-independent</p>
#19	Apr 17, 2017	<p>“Wells Fargo Launches New Brand Campaign: Building Better Every Day”</p> <p>https://newsroom.wf.com/press-release/marketing-and-sponsorships/wells-fargo-launches-new-brand-campaign-building-better</p>
#20	Apr 21, 2017	<p>“Wells Fargo Expands Class-Action Settlement for Retail Sales Practices to \$142 Million, Adds Accounts as Early as May 2002”</p> <p>https://newsroom.wf.com/press-release/wells-fargo-expands-class-action-settlement-retail-sales-practices-142-million-adds</p>
#21	Apr 24, 2017	<p>“Wells Fargo Issues Statement Regarding Federal Reserve, FDIC Revised Submission Determination”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-issues-statement-regarding-federal-reserve-fdic</p>
#22	Jul 6, 2017	<p>“Wells Fargo Forms New Stakeholder Relations Group”</p>

		https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-forms-new-stakeholder-relations-group
#23	Aug 4, 2017	<p>“Wells Fargo CEO Shares Updates on Company’s Rebuilding Trust Efforts in Companywide Message”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-ceo-shares-updates-companys-rebuilding-trust</p>
#24	Aug 22, 2017	<p>“Wells Fargo CEO Shares Progress with Team Members in Making Things Right for Customers”</p> <p>https://newsroom.wf.com/press-release/wells-fargo-ceo-shares-progress-team-members-making-things-right-customers</p>
#25	Aug 31, 2017	<p>“Wells Fargo Reports Completion of Expanded Third-Party Review of Retail Banking Accounts, Paving Way to Complete Remediation Effort”</p> <p>https://newsroom.wf.com/press-release/wells-fargo-reports-completion-expanded-third-party-review-retail-banking-accounts</p>
#26	Oct 3, 2017	<p>“Wells Fargo CEO Details Progress to Senate Banking Committee”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-ceo-details-progress-senate-banking-committee</p>
#27	Nov 28, 2017	<p>“Wells Fargo Responds to Misleading Wall Street Journal Foreign Exchange Story”</p> <p>https://newsroom.wf.com/press-release/wells-fargo-responds-misleading-wall-street-journal-foreign-exchange-story</p>
#28	Dec 21, 2017	<p>“Wells Fargo Launches Stakeholder Advisory Council”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-launches-stakeholder-advisory-council</p>
#29	Feb 2, 2018	<p>“Wells Fargo Commits to Satisfying Consent Order With Federal Reserve”</p> <p>https://newsroom.wf.com/press-release/corporate-and-financial/wells-fargo-commits-satisfying-consent-order-federal</p>

United Airlines – Flight 3411 – 2017

Item No.	Date	Title Source
#1	Apr 10, 2017	“Response to United Express Flight 3411” http://newsroom.united.com/news-releases?item=124753 1/
#2	Apr 11, 2017	“Statement from United Airlines CEO Oscar Munoz on United Express Flight 3411” http://newsroom.united.com/news-releases?item=124755 https://hub.united.com/united-express-3411-statement-oscar-munoz-2355968629.html
#3	Apr 13, 2017	“Statement on Press Conference” http://newsroom.united.com/news-releases?item=124756 https://hub.united.com/united-press-conference-statement-3411-2359345153.html
#4	Apr 27, 2017	“Statement from United Airlines Regarding Resolution with Dr. David Dao” http://newsroom.united.com/2017-04-27-Statement-from-United-Airlines-Regarding-Resolution-with-Dr-David-Dao
#5	Apr 27, 2017	“United Airlines Announces Changes to Improve Customer Experience” http://newsroom.united.com/2017-04-27-United-Airlines-Announces-Changes-to-Improve-Customer-Experience
#6	Apr 27, 2017	“We are making changes to ensure that we always put customers first” https://hub.united.com/united-actions-being-taken-2379920604.html
#7	Apr 27, 2017	“United Express Flight 3411 Review and Action Report” https://s3.amazonaws.com/unitedhub/United+Flight+3411+Review+and+Action+Report.pdf