Building Culture through Communication and Engagement

Keturah Pestel ~ October 23, 2018
SCCE Compliance & Ethics Institute

This Session Uses Polling

To Participate in polling

Download “SCCE Mobile” in your app mobile store. Then under the agenda find this session, scroll to the bottom and click “Poll Question” or go to PollEv.com/cei2018 to answer the active poll.
Practical Tips for Success

- My Background
- Smart Idea Sourcing
- Communication that Works
- Samples of Success (and Lessons Learned)
- Overcoming Objections and Creating Champions
- It Starts with One Step

My Background

Leverage what you’ve got

- Project Management → Ethics Program Leader
- Launched Thrivent’s Code of Conduct in 2006
- Worked solo until sabbatical (2013-2015)
- Thrivent added part-time staffer in 2014
- Transitioned to alternate staffing model in 2016
- Created Business Ethics & Legal Support Office in 2017; Lead Ethics portion + full time Sr. Specialist

<table>
<thead>
<tr>
<th>Year(s)</th>
<th>Total Ethics FTEs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-2006</td>
<td>0</td>
</tr>
<tr>
<td>2006-2014</td>
<td>1</td>
</tr>
<tr>
<td>2014-2015</td>
<td>1.5</td>
</tr>
<tr>
<td>2016-2017</td>
<td>1.3</td>
</tr>
<tr>
<td>2017-present</td>
<td>2</td>
</tr>
<tr>
<td>2019 →</td>
<td>???</td>
</tr>
</tbody>
</table>
How many FTEs are dedicated to ethics communication/training at your organization?

- 0
- Less than a full time person
- 1-2
- 3-5
- 6 or more

Smart Idea Sourcing

**Philosophy: Don’t Create What You Can Edit**

- Industry networking groups (forums, newsletters, Daily Digest, conversations, etc.)
- Conferences, seminars and webinars
- Industry Peers
- Awards (e.g. Ethisphere World’s Most Ethical Companies application)
- Training (repurpose content; consider off the shelf)
- Books, blogs, podcasts, articles, TED Talks
Communication that Works

**Know Your Audience; Pick Your Channel(s)**

- Communications from your group (draft your own or use turnkey content)
  - Daily News (intranet articles, targeted emails, newsletter)
  - Training (yours and that owned by others)
  - Blogs
  - Manager toolkit
  - Lunch and Learns
- Special Events
- Roadshows
- Cultivate champions to carry your message

---

**How much control do you have over ethics training content and format?**

- Almost none
- Just a little bit
- I have input, but someone else is the decision maker
- I am the decision maker but my organization has limited options
- I am the decision maker and have a wide range of options
Samples of Success since 2006

Training (at hire and then annually)

- Varied format
  - Online training course (most frequently)
  - In person discussions (every 4-6 years)
  - Quick hit quiz or short module
  - Embedded content
  - Internal development vs. vendor content
- Interactive, targeted subject matter
- Utilize evolving best practice training techniques
- Sometimes internal development, sometimes vendor
- Periodic manager training (new content every 2-3 years and at hire/promotion)
- Sometimes we are the solo content owners and sometimes we partner with other business areas

2018 Training

Meeting in a Box Format

- Recorded a “Talk Back” session after the 2017 annual ethics event
- Former HealthSouth CFOs Aaron Beam and Weston Smith talked about their experience and lessons that could be applied at work
- Table Talk sessions throughout the one hour session provided four discussion opportunities
- Intention: opportunity to discuss the gray w/ peers; develop internal scripts when issues were hypothetical and safe
- Feedback: I came in apprehensive, but this was the best training I’ve had. This training was not a waste of my time.
Training: What NOT to Do

Learn from my mistakes and successes

- In person training takes a LOT of time - be sure you're adequately staffed
- Prerecorded content can help ensure a more consistent message
- Spend more time thinking through logistics (signup, how credit is granted, completion reports) than you think you need
- Being first to the table with an idea comes with its own challenges
- Get input from other groups/cultures to make sure your idea translates well
- Be crystal clear on your core message and include it in all communications
- Focus on a higher level message – e.g. people really just need to know resources exist - then make them easy to find when someone goes looking
- Attention spans are dropping so keep honing your message

Samples of Success since 2006

Internal Communication

- Intranet websites
- FAQs
- Resources
- Self-service guides
- Policy links
- Collateral links (Code of Conduct, escalation chart, hotline)
- Training information
- Archived newsletters, ethics events

- Articles
  - Annual communication/reminders (e.g. gifts policy in November)
  - Ethics Awareness Month, Training Launch, Special Events
External Hotline & Publicly Available Resources

**Our promise as we serve**
We promise to guide Christine on her care with loving, honest, and skilled care.

**We are successful when our members achieve and sustain:**
- Commitment in the present.
- Confidence in the future.
- Communities thrive.

Self Serve Resources

**Decision Tree: Giving Gifts & Business Entertainment**
Making the right call for business gifts and entertainment can get a little tricky. Use this interactive chart to help you make the right choice. Still confused? Contact the Code of Conduct Officer for guidance at Box Code of Conduct ext. 844-5405.

Is there potential for:
- A conflict of interest?
- Gifts are quoted?
- Refusing or inducement?
- Is the gift cash or a cash equivalent (including gift cards or a gift certificate)?
- Would the gift or entertainment be considered lavish?
- Is it something unsavory, sexually oriented, illegal, or that otherwise counters The Thrivent Way?

☐ Yes
☐ No

Back

Resources
- Gifts and Business Entertainment Policy Guidelines
- Gifts and Business Entertainment Infographic
- Gift List
- State Specific Guidelines
- Compliance Manual/WSPs for Registered Reps
Key Policies

- Frequently asked about
- People should know (but don’t)
- Things they might worry about

Newsletters and Blogs

- Initially started with lengthy disclosure
- Over time, got buy-in to just share stories
Newsletters and Blogs

- Real stories build confidence in your processes
- Share good as well as bad
- Anonymized information is fine

The case of the spilled wine

At an out-of-town business dinner a few years ago, a junior-level member of a vendor team accidentally knocked over a bottle of red wine. It landed squarely on a Thrivent leader, ruining her clothing.

The business partner apologized profusely and offered to pay for dry cleaning expenses. The Thrivent leader politely refused.

The next morning, she found two $100 Visa gift cards under her door from the business partner. She knew it was against corporate policy to accept gift cards, and sought out the business partner to return them. He refused to take them back.

Upon returning home, the leader contacted the Code of Conduct Office to determine an appropriate solution. After listening to her story, Keturah suggested that she keep one card to cover the cost of the ruined garment and donate the other to a nonprofit of her choice. “The employee used sound business judgment in getting us involved up front to find an acceptable resolution in line with our principles-based policy,” Keturah said.

Samples of Success since 2006

Roadshows

- At program launch and periodically since
- With executives (annually- initially discussed Ethics Perception Survey results; now discuss that and/or culture trends, flags, concerns, investigations)
- With divisions or departments
- Following launch of something new
- After an investigation
- Newly acquired business entities
- Boards of Directors of parent company and subsidiaries

What can you use to create a natural connection point?
Sample Roadshow Slide

CODE OF CONDUCT OVERVIEW

We promote trust throughout the organization by creating a comfortable place for people seeking legal support, guidance on business ethics or who wish to report a concern.

- Doing what’s right (common sense)
- Following the law
- Asking if you don’t know

Samples of Success since 2006

Ethics Perception Surveys

- Utilized Corporate Executive Board (now CEB Global/Gartner) and Ethisphere
  - First survey in 2008; repeated annually then stretched to biannually over time
- Provided objective feedback about our own ethical perceptions and differences among divisions/sales groups
- Open ended comments helped convince leaders we needed to share more real stories (to help build confidence that our processes worked as we said)
- Primary focus: Organizational Justice and Comfort Speaking Up
Samples of Success since 2006

Ethics Awareness Events

- March (Financial Services); September (SCCE)
- Initially just a poster and article
- 2012: started annual Ethics Awareness Event
  - Recorded for later playback
  - Ethics speakers (experts and convicted felons who have served their time)
  - Leader panel
  - Decade Retrospective
  - Opening the Black Box (Investigations Process)
  - Case Studies (real cases from our company and the news)
  - Ethics in the Age of Transparency (shared our ethics survey results and real stories)

Ethics Event Posters

Opening the Black Box: What really happens during an investigation?

Case Studies: Real Examples, Real Lessons

The 2011 Ethics Awareness Event is Monday, April 1. We will see both ethical examples and ethical examples as the basis for our ethics discussion. Come learn how delays in acting can lead to significant consequences and how early action can result in better outcomes for everyone—the concerned individual, the group, the company, and the firm.

Monday, April 1
10 to 11 a.m.
Minneapolis Auditorium
Appleton A103-106

Questions? Email [ethics@company.com](mailto:ethics@company.com) or call 5050.
Ethics Event Posters

Overcoming Objections

How do I get buy-in?

Generally

- Appeal to best practices, legal requirements & outside sources
- What are others doing, how is it helping (and how didn’t it hurt)
- Board or Executive mandates help
- Demonstrate value add (and risk avoidance)

Team: start with what you can control

- Ensure your team is engaged. If it’s just you, or you and a manager, it’s critical that your manager supports you.
- **Start with just one thing.** Build success one piece at a time.

*You can’t make progress until you start.*
Federal Sentencing Guidelines

Company Performance
- Robust Risk Management
- Increased Employee Productivity
- Customer Loyalty

Culture of Integrity
- Policies
- Oversight
- Due Diligence
- Communications & Training
- Monitoring, Assessment, & Evaluation
- Discipline & Incentives
- Appropriate Response
- Risk Assessment

How many champions do you have?

I’m struggling to think of anyone who falls in that category.

I have 1-3 champions.

I have a solid handful.

More than I can reel off during the time this poll is open.
Winning Management Support

Counter objections with data
- Increased engagement
- Higher ethics survey scores (focus especially on organizational justice and comfort speaking up)
- Problems that have come from ethics failures
- Best practices examples
- Where it hasn’t gone wrong
- Start with something smaller and less controversial or at a level they will support even if it’s not everything you want.

Creating Champions

Winning Business Partner Support
- Can you help solve their problems?
  - Ideally, get a champion to help you
  - Barring that, create a champion. What are their concerns? How can you address them?
  - What would they support? Can you do it together?
- Would it be better to draft something and run past them for support/review? Or would it be easier to try something you control and show them it worked?
- 1:1s, group meetings (Harmonization Team)
It Starts with One Step

There’s never enough (*time – people – resources*)

- Start with one thing
- Modify something you already do
  - E.g. training - can you have a mini-module?
- Can you write one article or one email (adapt to your corporate culture/norms)?
- Can you adapt/reuse/share one item with managers? E.g. ECI case study #RespectAtWork see ethics.org
- Ask your champions to help

Questions?
Contact Information

Keturah Pestel
Program Manager, Business Ethics Office
Thrivent
p 612.844.3029 • keturah.pestel@thrivent.com
thriventcodeofconduct.com