



**Building Culture through  
Communication and Engagement**

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

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**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](http://PollEv.com/cei2018) to answer the active poll.



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► Building Culture through Communication and Engagement



**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



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▶ 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

Year(s)	Total Ethics FTEs
Pre-2006	0
2006-2014	1
2014-2015	1.5
2016-2017	1.3
2017-present	2
2019 →	???



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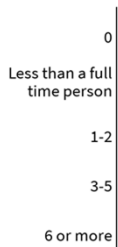
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**How many FTEs are dedicated to ethics communication/training at your organization?**



Start the presentation to see live content. Still no live content? Install the app or get help at PAIIE.com/app

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▶ 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



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► 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



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**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

Start the presentation to see live content. Still no live content? Install the app or get help at [PAIIE.com/app](http://PAIIE.com/app)

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► 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



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**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.*




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**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




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**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




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► **Thriventcodeofconduct.com**  
**External Hotline & Publicly Available Resources**

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► **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 Office for guidance at Box Code of Conduct or ext. 844-5505.

**Is there potential for:**

- A conflict of interest?
- Self-promotion?
- Exceeding an endorsement?
- In 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 causes The Thrivent Way?

Yes  
 No

**Next:**

**Resources:**

- Gifts and Business Entertainment Policy Guidelines
- Gifts and Business Entertainment Infographic
- GIL-140
- State Specific Guidelines
- Compliance Manual/SPNs for Registered Reps

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Infographics publicly available  
at [Thriventcodeofconduct.com](http://Thriventcodeofconduct.com)

**Key Policies**

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

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► Newsletters and Blogs

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



Although this content presented here is for illustrative purposes only, they are used as they are in real life situations within Thrivent Financial or other companies. The examples are not intended to refer to any specific person within Thrivent Financial. Content is reviewed on a case-by-case basis and any disciplinary action taken by Thrivent Financial may vary depending on the circumstances.

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► 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, Katarah 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," Katarah said.

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► 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?

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▶ 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 



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▶ 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

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▶ 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)

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► Ethics Event Posters

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

Don't miss our Ethics Awareness Month event! Discover financial sales regions of misconduct around the world, investigate an ethical dilemma, and see how the FBI can help you determine when "Come to Work" is appropriate.

**Wednesday, March 7**  
2-3 p.m.  
Mississippi Auditorium  
Appleton A103-A106  
Missouri Conference and Convention Center  
Number 1 Legal Building  
St. Louis, MO 63102



**Case Studies: Real Examples, Real Lessons**



The 2013 Ethics Awareness Event is Monday, April 1. We'll see both relevant examples and external examples as the basis for our ethics education. Come see how ethics in real-world contexts can lead to significant downstream impact and how early ethics can make a better outcome for everyone—the consumer, the retailer, the brand, the investor and the future.

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

The video conference will be recorded and available for later viewing.  
Questions? Email Box Code of Conduct or call ext. 3565.

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► Ethics Event Posters

**"WHY GOOD PEOPLE AND ORGANIZATIONS DO BAD THINGS"**

2015 March Ethics Awareness Event

This interactive case study discussion explores why good people and organizations can act unethically. The case involves a fictionalized but realistic scenario regarding the handling of ethical concerns within organizations can present the slippery slopes that lead to administrative and/or unethical behavior.



Guest speaker David Schultz

- Professor, Northern Illinois University
- Director of Global Business Ethics
- Editor, Journal of Public Ethics
- Author, *Business Ethics: A Practical Approach*
- Author, *Business Ethics: A Practical Approach*

Join us for the March Ethics Awareness Month event

**COOKING THE BOOKS**

The rise and fall of HealthSouth Corp.



Hear the story of HealthSouth, one of America's largest and most successful healthcare service providers. Anne Davis and Rebecca Smith, former CFOs and co-founders of HealthSouth, share how they became part of a SEC 8-K filing, accounting fraud and the largest in American history and the lessons they learned.

Sign up via the Platform.

**BREAKAWAY SESSION:** Discuss ethical scenarios and "what if" situations. 4:30-5 p.m.




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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.**

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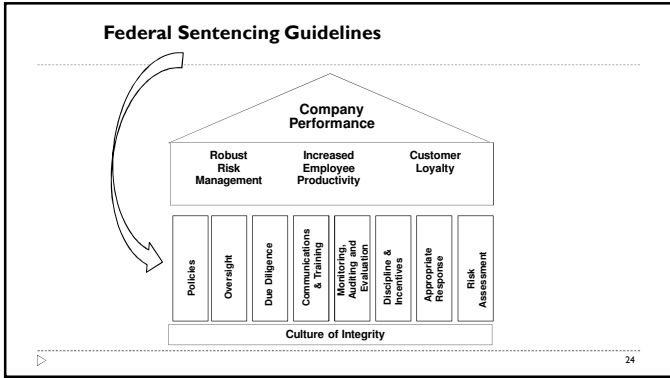
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### How many champions do you have?

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.

Start the presentation to see live content. Still no live content? Install the app or get help at [PAIEX.com/app](http://PAIEX.com/app)

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▶ **Creating Champions**



### 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.

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**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?
- ▶ I:ls, group meetings (Harmonization Team)



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**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 #RespectAtVWork see [ethics.org](http://ethics.org)
- ▶ Ask your champions to help



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**Questions?**



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**Contact Information**

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