Think Global, Act Local
- i.e., Why Designing a Global Ethics Program is Important…Even for Domestic Organizations

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Goals

- Recognize heterogenous workforce
- Adapt to various cultures
- Implement strategies to enhance program
- Globalize thinking via small changes
Workforce

Know Your Audience

Who are they?  Where are they?

The more you know, the better you can influence
### Who’s your audience?
- Expatriates vs. LCNs vs. TCNs
- Full-time vs. Part-time
- Contractors
- New hires
- Newly acquired

### What backgrounds do they have?
- Culture / Ethnicity / Religion
- Generation
- Education
- Work / Industry / Multinational experience
Where are they?

- Identify where your audience is located
- Security concerns
- Language needs
- Time zone challenges

Give the People What They Need

What do they need? How do they get it?
Identify Basic Requirements

- Code of Conduct
- Organization-wide Policies
- Core compliance / ethics training
- General Awareness

Forms the baseline for your Ethics & Compliance Program
Managed centrally in some capacity

Identify Specific Requirements

- Regional needs – e.g., GDPR
- Country requirements – e.g., labor laws and Helpline rules
- State laws – e.g., NY sexual harassment law

Forms supplemental program requirements
Determine how to best manage for your org
Communication Preferences

- Logistics
  - Centralized distribution vs diversified distribution
  - Translations deployed (risk-based / need-based)

- Local communication methods?
  - Newsletters
  - Intranets
  - Hard copy publications
  - Leaders’ comms

Culture
What do I mean by “Culture”?

Talking about **work**:  
The way things are done around here  

*and*

Talking about the **larger world**:  
The customs, arts, social institutions, and achievements of a particular people

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**Questions to Consider – Work Culture**

- What is the culture of your organization?
- How does it vary around the company/across different groups?
- What are some similarities regardless of where you work/your level?
Questions to Consider – Larger Culture

- Is there a predominant external culture?
- How does the external culture vary around the company?
- Are you biased towards a particular culture?

Ethical Culture & Misconduct

- MITIGATION = INTERNAL CONTROLS
- MITIGATION = BACKGROUND CHECKS & EMPLOYEE MONITORING
- MITIGATION = ETHICAL CULTURE
- Opportunity: The Knowledge and Ability to Carry Out Fraud:
- Pressure: Motivation or Incentive to Commit Fraud:
- Rationalization: Justification of Dishonest Actions: FRAUD
Rationalization vs Culture

Culture & Ethics Programs

- Reporting Concerns (Willingness to Speak-Up)
  - Hierarchical vs lateral societies
  - Comfort challenging Authority
  - Access to Helpline

- Understanding Code, Policies, Training (Common language)
  - Language
  - Metaphors
  - Sports References
  - Cultural References
Strategies

Strategies – the Who and Where

- Find Employees
  - HR – employee data
  - Facilities / Security – location data
  - Finance – business roll-ups / pay data

- Cultural Understanding
  - Utilize ERGs and/or local employees
  - Purchase cultural awareness tools/systems
  - Visit local employees
Strategies – the What and How

- Specific Requirements
  - Follow blogs on key topics
  - Subscribe to free news alerts
  - Partner with SMEs within company

- Getting Your Message to Employees
  - Use what works
  - Ask how they’d like to receive

Small Changes

To Globalize Your Thinking
Five Strategies to Globalize Thinking

1. Use simple language
2. Incorporate local stories
3. Take note of representation
4. Schedule time with far-flung locations
5. Keep informed about big news stories

Wrap-Up

- Multiple “work cultures” within organization
- Various “larger cultures” influencing organization
- Core program elements designed across cultures
- Specific program elements tailored for local use
- Globalizing program helps even domestic orgs
Thank you!
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