



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

 **Freddie Mac**
We make home possible®

Rielle Miller Gabriel
March 15, 2019

Goals 

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

© Freddie Mac 2

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

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

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

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

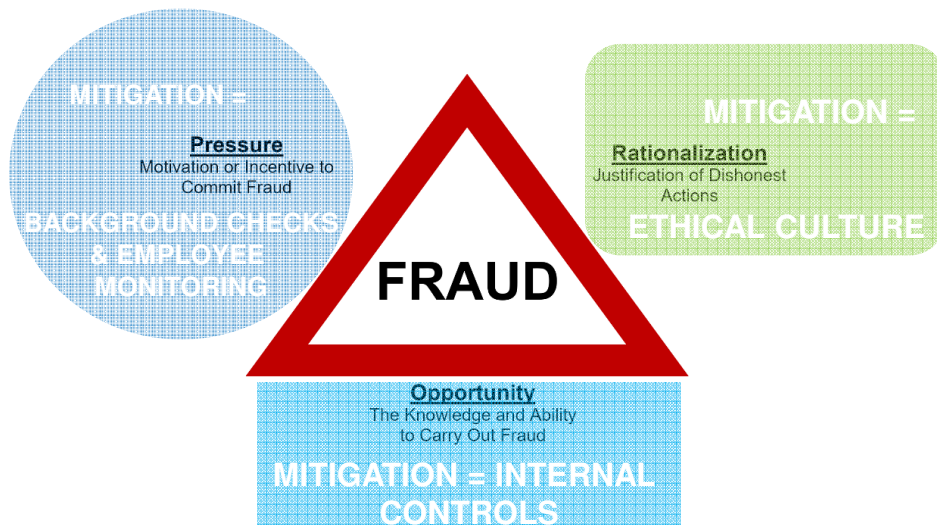
- What is the culture of your organization?
- How does it vary around the company/across different groups?
- What are some similarities regardless of where you work/your level?

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



Rationalization vs Culture



V.



Culture & Ethics Programs

▪ Reporting Concerns (Willingness to Speak-Up)



vs



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

- 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

© Freddie Mac 23

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

© Freddie Mac 24

Thank you!

Rielle Miller Gabriel

Rielle_miller_Gabriel@freddiemac.com

703-450-3538