Taking Your Code Digital: Here’s How to Do It Right

May 1, 2020

Codes 2010-2016: From contracts to marketing documents
Codes Today: “Digital magazine” “Flipbook” “App” “Mobile-first”

• Section 1: What’s behind changing Code standards

• Section 2: Getting your content ready for digital

• Section 3: What a digital Code needs – and what to avoid

• Section 4: Putting the Code to work in your program
Why are Codes are changing?
Because regulator expectations, technology/tools, and your audience have changed.

Observation 1: Regulators/prosecutors no longer accept “check the box” programs

• Early Codes were written by lawyers and looked like contracts
• “Compliance 1.0” – Compliance often reported to (and thought like) Legal; program efforts were defensibility-based; goal was an audit trail
• Now prosecutors and regulators have signaled that “a perfect paper program” isn’t good enough – they want proof that programs are really working
• “Working” for a Code means engaging employees – a different standard

Why are Codes are changing?
Because regulator expectations, technology/tools, and your audience have changed.

Observation 2: Your audience has changed

• Internet has re-wired our brains for quick processing – “screen and glean”
• Developments in technology & tools have raised expectations for content & visuals
• All this presents competition for ANY content, including your compliance messages
• Section 1: What’s behind changing Code standards?

• **Section 2: Getting your content ready for digital**

• Section 3: What a digital Code needs – and what to avoid

• Section 4: Putting the Code to work in your program
Modern Code 1: Rethink the organization
Pick a framework and vocabulary that will be meaningful to your audience.

• Think beyond a list of topics – tie the organization to something that’s fundamental to the company and that will mean something to employees

• Tying the Code to business or culture communicates that doing the right thing is PART of your job

• Options can include: values, legacy, version of public branding, something from legacy/history – or any phrase or set of words that employees will really recognize

• Consider using positive language (“We follow the law”)
Modern Code 2: Talk like a human
This can be surprisingly hard for people used to communicating in a formal way!

• People in the web talk like humans – like friends. (There’s a reason why – we respond!)

• Fluency heuristic – “We are swayed by...ease and palatability... We not only process certain information more quickly and effortlessly, we like and trust it more.”

• The more normal this becomes, the stranger a disembodied corporate voice sounds – and the faster we screen it out.
Modern Code 3: Focus on practical, relevant guidance
Not what the law says – but what employees need to know and do

• Use the word “you” or “this means we” (in the collective sense) – it can force you to think in terms of specific behaviors and actions

• Keep legal concepts and definitions (what employees need to know) separate from specific guidance (what employees need to do)

• Overall principles or “point of view” statements should be compelling and brief
Why take your Code digital?

- **Meet people where they are**: The average American adult spends four hours a day on their phone.

- **Build a no-excuses culture**: When your Code is easy to find and access, it’s harder to say, “I didn’t know.”

- **Demonstrate importance**: Your Code is the cornerstone of your program. It should feel relevant to your employees’ lives and work.
What do we mean by a “digital Code?”

• Link to a PDF (technically it’s online, so it’s a “digital” Code)

• Flipbook

• Website
  • Standalone website
  • Subsection of your external facing website
  • Page or section on your intranet
  • Digital experience on your LMS

• App

Digital Code Format Options: Apps

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<thead>
<tr>
<th>Feature/Capability</th>
<th>Pros</th>
<th>Cons</th>
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<tbody>
<tr>
<td>100% phone based</td>
<td>Great for 100% mobile audience</td>
<td>Not great for:</td>
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<tr>
<td></td>
<td></td>
<td>• Desktop users/tech phobic</td>
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<td></td>
<td></td>
<td>• Companies that don’t use apps</td>
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<td>Apple/Android require different apps</td>
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<td>Need to build &amp; maintain 2 apps</td>
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<td></td>
<td></td>
<td>OR</td>
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<tr>
<td></td>
<td></td>
<td>Switch all users to one phone type</td>
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<td>Distributed -&gt; app store or company app environment</td>
<td>Great if you have dedicated apps</td>
<td>Updates can take time to reach app store</td>
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<td></td>
<td>Great if employees are in habit of using apps for other processes</td>
<td>Not all users will download updates</td>
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<tr>
<td>Apps are best when they make use of mobile nature (Yelp, Maps)</td>
<td>Great if there’s identifiable, real time info to offer</td>
<td>Most Codes are written as reference guides, not workflows</td>
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<tr>
<td>Requires app developer to build, maintain, update</td>
<td>Quality product, can look modern Lots of functionality available</td>
<td>Expensive to build/maintain No self maintenance Consider privacy if collecting data</td>
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### Digital Code Format Options: Hard-Coded Website

<table>
<thead>
<tr>
<th>Feature/Capability</th>
<th>Pros</th>
<th>Cons</th>
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| Device agnostic    | - Can be reached by any computer or device with a browser  
|                    | - Apple vs Android doesn’t matter (Users choose their own device) | |
| Works like website | - Fully responsive (adjusts to any screen)  
|                    | - Found online, so no need to distribute or update via app store  
|                    | - Updates available immediately | |
| Requires app developer to build, maintain, update | - Quality product, can look modern  
| | - Lots of functionality available  
| | - Can be very customized | Expenses to build/maintain  
| | | - Self maintenance limited  
| | | - Requires company IT support to host (or vendor SLA, if hosting)  
| | | - Even quick updates can be | |
| Digital format allows new possibilities | Digital hub, media, analytics, chatbot  
| | Can be searchable | |

### Digital Code Format Options: Microsite

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| Device agnostic    | - Can be reached by any computer or device with a browser  
|                    | - Apple vs Android doesn’t matter (Users choose their own device) | |
| Works like website | - Fully responsive (adjusts to any screen)  
|                    | - Found online, so no need to distribute or update via app store  
|                    | - Updates available immediately | |
| Commercially available software with WYSIWYG editing | - Self editing and maintenance possible  
| | - Updates not prohibitively expensive  
| | - Very light IT support needed | - Includes some format limitations  
| | | - No RTL languages  
| | | - Does not bundle languages for SCORM | |
| Digital format allows new possibilities | - Can be very customized  
| | - Serve as digital hub for program (link to policies, resources, etc.)  
| | - Fully searchable | |
Digital Code Format Options: Flipbook
Shionogi: www.rethinkcomplianceflipbook.com
Thrivent Financial: http://mydigimag.rrd.com/publication/?i=271455#l"issue_id":271455,"page":6

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| Can refresh and extend the life of an existing PDF Code | - Because the flipbook is based on a PDF, allows clients who have invested in a PDF Code to upgrade the experience while extending the life of their Code  
- Can include live links  
- Can include learning aids and other embedded collateral | - Not fully responsive  
- Functions like a PDF Code on a phone, so necessary to pinch and squeeze; not searchable  
- Updates are a multi-step process: Update the PDF Code, re-create the flipbook, re-embed the learning aids |

Your digital Code must:

1. Work on every type of screen
   We move seamlessly among laptops, phones and tablets all day long. Even employees who aren’t deskbound get information from a phone – and this is true around the world.

2. Be organized like your user thinks
   Top-level messaging should be front and center and easy to find. Navigation tools should use the language your user uses. And there should be multiple ways to find the same information.

3. Represent your brand
   Generic just won’t cut it. Your Code should look and feel like it was created for your organization and no one else.
Your digital Code **must:**

4. **Be created by people with real compliance expertise**
   To ensure your Code is relevant to your users and delivers your company’s message, you need partners who are fully up to date with the nuances of risk areas as well as modern compliance best practices.

5. **Be easily located within your organization’s system**
   That means findable by search and by a logical navigation within your website or intranet. As much as possible it, also means prominent links from main pages and multiple drivers pointing to it.

Your digital Code **really should:**

1. **Be fully searchable**
   To get the answers they need quickly, your employees should be able to search at the very least by keyword.

2. **Have a reasonable maintenance plan.**
   Consider whether you want to go back to the vendor every time a policy link — and also what it will cost.
Imagine if your digital Code actually could:

1. Be multimedia
   • Slideshows
   • Video
   • Audio

2. Include interactive tools and learning aids
   • Decision trees
   • Calculators
   • Scenarios
   • “Check your understanding”
   • Training courses
   • Attestation
   • Quantifiable proof of how much people read

But your digital Code really doesn’t need:

1. To be an app
   • Platform-dependent
   • Expensive to build and maintain
   • Privacy issues

2. A raft of analytics you don’t have the resources to act on
   Yes, you need data and accountability, but information is only as good as what you’ll do with it.

3. To replace all of your Code-related communications
   You will still need to reach people in many ways.
Getting started with your digital Code

1. How will people actually use the Code?
2. Where will the Code live?
3. Who will maintain the Code?
4. What kind of support do you get from your IT team?
5. How will you train people on the Code?
6. How will you launch your new digital Code?

To see examples:

• GATX Code: [https://ir.gatx.com/code-business-conduct-and-ethic](https://ir.gatx.com/code-business-conduct-and-ethic)
• Website-style digital Code: [www.rethinkcompliancecode.com](http://www.rethinkcompliancecode.com)
• Flipbook-style digital Code: [www.rethinkcomplianceflipbook.com](http://www.rethinkcomplianceflipbook.com)
• Digital Code overview: [www.rethinkyourcode.com](http://www.rethinkyourcode.com)
URL: https://ir.gatx.com/code-business-conduct-and-ethic

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Putting the Code to Work 1: Develop a Code launch strategy

Taking a strategic approach to communications can amplify the impact of your new Code

• Pinpoint your audience's wants and needs and the best way to get their attention
• Identify the channels and formats you can use for messaging – it may be more than you think!
• Formulate key messages that are tailored to what you want your audience to know or do

Putting the Code to Work 2: Going digital expands possibilities

Your Code can be more than a standalone policy when you take advantage of online tools

Depending on the format:

• Your Code can also be a course (require & track completion of some or all elements)
• Your Code can also be a portal (link to policies, key resources, even training or helpline)
• Your Code can include/distribute further training (like manager-led training materials)
Quick Summary

• The standards for Codes have changed – partly because of regulators, but mostly because of your audience

• Digital tools give you an exciting opportunity to rethink how you approach your Code – and how you use it

• Keep in mind:
  ✓ Meet people where they are
  ✓ Choose an appropriate, workable format
  ✓ Organize it like your user thinks
  ✓ Know where the Code will live
  ✓ Explore a range of options – digital doesn’t have to mean app

• Once you create a Code, have a plan to put it to work in your program

Questions?