How to create a Successful Compliance & Ethics Week

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How to create a successful Compliance & Ethics Week

- Why - getting buy-in and tips on how to get started if you’ve never held a Compliance & Ethics Week
- Who - forming a great team and identifying your audience
- How - get the most out of a limited budget and implement your plan
Setting a Standard of Compliance

- Corporate Compliance Policy
- Compliance Monitoring Program
- Compliance Management Tool
- Key Result
- Reporting Compliance Concerns

Corporate Compliance Policy

Promotes the Company’s commitment to maintain compliance with applicable federal, state, and local regulations
Compliance Monitoring Program

Designed to help the company identify all of its obligations, assign responsibility for completion, track progress, and document completion in an effort to ensure adherence to various legal and regulatory requirements.

Compliance Management Tool (CMT)

System used to inventory and track all of its significant deadlines and obligations
Compliance Key Result

- 100% Compliance with all regulations.
- Performance is measured using a graduated scale based on the severity of the violation.

Compliance Contact & Reporting

- Direct Reporting to the Compliance Officer
- Anonymous Reporting
Obtaining Buy-in

- SCCE hosts the week each year

- Discuss with the Compliance Committee and/or other executives who can be compliance champions.
  - Explain the goals
  - What’s in it for them?
  - Ask them to be advocates

- Consider making it a part of your performance goals

- Budget for it

Inaugural Compliance & Ethic Week

Goals

- Raise awareness about and commitment to one of the company’s key results
- Reinforce compliance and ethics obligations
- Educate employees on specific compliance subjects
- Engage employees in compliance by sharing best practices
You can’t shouldn’t do it alone!

- Cross-functional team
  - Corporate Compliance - led
  - Ethics
  - NERC Compliance
  - Environmental Compliance
  - Safety Compliance
  - HR Compliance
  - Corporate Communications

Themes

- Make it work for you
- SCCE also has a suggested theme each year
Compliance & Ethics Week Plan

- In-person events with presentations from the team
- Emails
- Giveaways & Prizes

Inaugural Compliance & Ethics Week

- Start small but be impactful
  - Focused in-person events
    - Lunch & Learn Kick-off
    - Rise & Shine Breakfast
  - Presentations from the team
    - Let each compliance team member present what is most important to their area
    - What will resonate with your audience?
    - What do they need to hear?
    - Focus on key regulations, compliance hot topics, and other best practices
Compliance & Ethics Week

- Compliance Communication of the Day
  - Team members / communications created
  - Daily Compliance Challenge - quiz of 3-5 questions

- Track & reward participation
  - Daily participation winners, winner of the day, grand prize winner

- “Over”communicate
  - Emails before, during, and after Compliance Week
  - Management Update email
  - Tone at the top - Intro email included CEO quote
  - Breakroom, bulletin boards, signage, screensavers, etc.

Reinforce your message

- Giveaway to all employees - Compliance fortune cookie
  - Team members created messages
  - Included the Ethics Hotline as the “numbers” on the back

- Planned to plug the event during a scheduled conference call, but...
  - One page handout for Supervisor messaging
Supervisor Compliance Week Handout

- Identify compliance areas your team will work on throughout the year. Have your team discuss personal compliance experiences or thoughts.
- Commend employees for compliance. Ask for employees to recognize accomplishments or you as a manager can recognize compliance efforts of your team. Be positive and specific.
- Regularly ask yourself these compliance questions:
  - What is the compliance implication of the activity I am preparing to do?
  - Why am I doing it?
  - How could it affect me or others?
  - What can I / we do to lessen the compliance risk?
- Questions for the group:
  - Where do we have potential compliance concerns?
  - What can the team do to address these potential concerns?
  - What can management do to address potential concerns?
  - Does anyone want to share past compliance experiences or initiatives they are a part of this year?

Overall Results

- High participation
- Only spent about $1 per employee
- Positive feedback
  - Request to include more non-corporate locations in hosted events
Second Annual Compliance & Ethics Week

- Added IT Security for awareness of CIP and other security

- Hosted events at more locations and at non-corporate sites
  - Three service centers
  - One plant
  - Corporate Headquarters
Popcorn Day

- Spin the Prize Wheel
- Compliance Categories
- Reused Jeopardy Questions

Compliance & Ethics Week

- Compliance & Ethics Week Jeopardy videos
  - Sent in short clips via email
  - Link at end of each video to a survey monkey
  - Prizes for participation

- Giveaway for all employees
  - “Commit to Compliance” lanyards
  - Doubled as a promotion of our security policy to wear your badge in clear view
Overall Results

► Well-attended events

► Excellent feedback on Jeopardy videos:
  ► This has been the most entertaining learning so far! I hope more videos like these are created for the future.
  ► It is a serious issue but the videos made it much more interesting and fun while providing important information. I hope to see more videos!
  ► It brought to light some things I hadn't heard or didn't know prior to watching the videos.
  ► I think these videos were fun to watch, easy to remember the info presented and I LOVE "Alex Trebek's" hair !!!! Thanks for your hard work!

The Real MVP

![Image of two people]
**Budget considerations**

- Be resourceful - use what you have
  - Training department
  - Communications department
  - Printing services, training videos clips, etc.

- Show me the money
  - Plan ahead - add a budget line item
  - Ask your team members for $
  - Spend on most impactful items
    - Consider “one time use” items versus permanent reminders

**Lessons Learned**

- Make sure there is a point person to pull everything together
- Most positive feedback from locations where we hosted events: in-person *means* something
- Piggyback off activities that employees are already accustomed to - *but* put a twist on it
- Be inclusive of non-corporate areas
- Have a Plan B
- Don’t forget to ask for feedback - and use it
Don’t stop there

- Quarterly Activities
  - C-level one page report
  - Compliance Committee
  - Director Level Compliance Meeting
  - Key Result Reporting
  - New Hire Training
  - Compliance Communications

- Also being considered - Compliance Roadshow

Get Ready!

Corporate Compliance & Ethics Week
November 5–11, 2017
Questions?