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Objectives Gain insight on what works and what doesn't work in a rapidly changing organization Learn the approach our company uses to meet the challenge Hear about the tools we use on our journey to foster an ethical culture





What makes our program complicated

- Decentralized management
- Operations in a vast number of countries
- Growth by acquisition (130+ in 10 years)
- Strong founder-led cultures from acquired entities
- Lack of common platforms
- Unregulated industry with perceived history of lax compliance
- Industry with traditionally high employee turnover



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What didn't work historically

- Global messages from HQ were ignored
- Relying on cascading messages
- Not translating global policies / phased rollouts
- Lack of consistent consequences to wrongdoing
- Positioning of the E&C office as process or administratively focused

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What works today

- · Centralized vs. localized functions
- Dedicated ethics & compliance resources in-country
- · Relationships with business leaders
- Enforcement of consequences
- Close collaboration with other functions e.g. audit, HR, DEI, finance

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How our company meets the challenge

- Company value statements
- Global CEO sets the tone and is a visible champion
- Willingness of leadership to make tough decisions
- Strong and influential Legal & Compliance team



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Useful tools / tactics from the E&C team

- Onboarding training (online and live)
- Consequences for not completing training
- · Global disciplinary guidelines
- · Strategic attendance/use of leadership meetings
- · Ethical leadership workshops
- · Use of investigations as teachable moments
- Share vision statement often
- Leverage client requirements
- · Speak up policy and platform with strong follow through
- Reporting tools e.g. for gifts & hospitality and conflicts of interest
- Audit report findings
- · Employee engagement survey
- Relationships, relationships

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More tools to deploy in our journey

- Embedding in the development of controls environment
 - Fostering compliance at the point of transaction
- · Embedding in business processes
 - In pitches proactively tout our ethical values, integrity and E&C program
 - · Onboarding of suppliers and business partners
- · Embedding in employee lifecycle touchpoints
 - · Recruitment, especially in leadership ranks
 - · Promotions
 - · Performance reviews
 - Leadership development programs
 - · Weighing in on nominations
 - · Ethical leadership educational content/case studies
 - Training at promotions

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Parting words Understand it's a journey. Wherever you are today, just focus on building momentum. Don't go it alone – find allies!

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Thank you caveni.wong@dentsu.com