Britta Luescher is Director for Compliance training at Novartis International, where she established new and efficient ways for compliance training and internal communication.

Peggy Dolin-Brunel received a Master degree in Biology from Paris University. She has 20 years of professional experience with Sanofi. She started in clinical research as clinical research associate and lead writer in charge of clinical parts of several US and European registration dossiers.

Nichole Pitts is the Vice President, Compliance and Ethics Officer providing support to Louis Berger International operations. She oversees Louis Berger’s global anti-corruption policy and due diligence program, identifies and assesses compliance risk, conducts training on various compliance topics, mentors employees and conducts investigations.

Matt Plass has an extensive background in e-learning, blended learning, classroom education and learning design for adult audiences and has engaged with numerous global Fortune 500 organizations in the design and development of strategic learning initiatives.
1. CHALLENGES FOR 2018
2. GOVERNANCE & STRATEGY
3. BUILDING THE COMPLIANCE BRAND
4. REACHING YOUR PEOPLE
5. MEASURING EFFECTIVENESS
6. DRIVING CULTURE

What is the greatest training challenge you face in 2018?

A. Being asked to do more for less
B. Consolidating and improving our program
C. Adapting to changing regulatory environment
D. Something else...
How would you describe your compliance training strategy?

A. Consistent, articulated, measurable
B. Confused and inconsistent
C. We don’t have one.
D. Something else...

Training Strategies & Guidelines

- Internal Associates
- External Contractors
- Third Parties and External Service Providers
**DO YOU TALK WITH YOUR PARTNERS?**

All new hires: On-boarding course "Compliance@Novartis"

**COMPLIANCE VISION**

For all employees to understand, commit to, and own efforts to ensure ethical and compliant behavior in day-to-day business activities to support long-term value creation for Louis Berger.

All employees will:

1. Understand the requirements and risks that pertain to their specific role and demonstrate the initiative to seek out help, when necessary, to appropriately manage the risks;
2. Speak Up when they see something that could create a risk for the company;
3. Ensure that compliance training and the transfer of knowledge are effective to manage risks and support business objectives;
4. Demonstrate commitment to the compliance vision and proactively challenge the compliance risk priorities and mitigation efforts.
How is compliance training perceived in your organization?

A necessary evil
A useful reminder of the rules
A great way to boost our compliance culture
Something else...

BUILDING THE COMPLIANCE BRAND

HOW SANOFI APPLIES THE LEARNING CURVE

Experience (people, network...)
Training (e-learning, F2F, R&U...)
Communication (short videos, site events...)

TIME

Awareness

Understanding

Acceptance

Adoption
COMPLIANCE CALENDAR

1. Kick-Off Campaign
   - Email Template Kit
     - January
2. 100% Workforce Competency
   - Primary Learning
     - January-February
3. Compliance Is Everyday
   - Intranet Banner Ad
     - All Year
4. Sustain the Buzz
   - Video Booster
     - Mar/Jun/Sep/Dec
5. Support Me In the Moment
   - Infographics and Performance Support
     - All Year
6. Keep Me Updated
   - Updates & Refreshes
     - Calendared and Just in Time

REACHING YOUR PEOPLE

We get the right content to the right people at the right time.

Always  Sometimes  Never  Something else...

A  B  C  D
ARE YOU SETTING STANDARDS?

**Content evolution**
- Use of real Novartis cases
- Pre-knowledge checks
- Targeted function
- Specific launches

**Technology evolution**
- Real-time reporting (24/7)
- Increased use of interactivity
- Responsive framework
- Improved learner experience

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ARE YOU ASKING THE RIGHT QUESTIONS?

**Group &C Local Training Plan Support**

**Designing a local training plan**

**Definition**
A training plan is a document that guides the planning and delivery of locally delivered training. A well-developed training plan allows you to prepare for and deliver a thorough and effective curriculum to Functions and Associates based on their needs. Some key things to remember are that you want to be simple, organized, and realistic.

**Key steps**
1. Understand and assess the risks and identify corresponding training gaps/needs
2. Define target groups according to needs/gaps analysis
3. Select training content and frequency
4. Select training tool, resources, and delivery methods

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NOVARTIS
TRAINING LANGUAGE IS A KEY ELEMENT

GIVE THE CHOICE TO THE LEARNER

SANOFI

COMPLIANCE & ETHICS TOOLKIT

Welcome to the Compliance & Ethics Toolkit.

The Office of Compliance & Ethics Toolkits contain various resources and compliance resources.

Recent News:
- Compliance management system — Updated 2/24/2022
- Compliance management system — Updated 2/24/2022
- Ethics and Compliance Training
- Ethics and Compliance Training
- Ethics and Compliance Training
- Ethics and Compliance Training
- Ethics and Compliance Training
- Ethics and Compliance Training
- Ethics and Compliance Training
- Ethics and Compliance Training
SAFETY & ETHICS MOMENTS

Corporate Citizenship
Louis Berger is committed to giving back to the communities in which we do business and adhering to our mission of improving the quality of life around the world. We are committed to delivering exceptional services to our clients and business partners, providing a work environment that allows employees to meet their professional goals and ensuring our work results in a positive contribution to society.

Chemical Safety
Chemicals are a major part of our everyday life — at home and at work. Examples include fearing, corrosives, solvents and numerous other substances. As long as we take proper precautions, these substances can be handled safely.

Chemicals that you use at home include gasoline, paints, fertilizers, lawn chemicals, insect spray, bleach and other household cleaners. However, chemicals you may use at work are facility-specific solvents, laboratory chemicals, fuels, paint, office copier chemicals, correction fluid, lubricants and cleansers.

SAFETY & ETHICS MOMENTS

MEETING MOMENTS

FEBRUARY 2017

THNK SAFETY

COMPLIANCE & ETHICS

HEALTH & SAFETY

Week 1: Charitable Contributions
Louis Berger supports giving back to our communities through charitable contributions, pro bono assistance, volunteering and partnerships with local charitable and professional organizations. Any employee making a request for a Louis Berger charitable donation should follow the guidelines outlined in the "Charitable Giving" section of the Louis Berger Anti-Corruption Policy. Through this process, Louis Berger takes reasonable steps to ensure that a contribution is not an illegal payment to a government official or other entity and does not violate our Code of Conduct or policies in any way.

Week 1: Ways of Exposure
We are exposed to chemicals by these ways:
- Inhalation: Breathing in dusts, mists and vapors — Example: Working with bags of concrete at home without a respirator
- Ingestion: Eating contaminated food — Example: Having lunch in the work area where there are Ultimate containers or not washing hands before eating
- Absorption: Skin contact with a chemical — Example: Contact dermatitis or an eye irritation
- Injection: Penetrating an agent into the body through a needle or a high-pressure device — Example: Needle stick or minor of a high-pressure washer.

Week 2: How to protect against Chemical Hazards
You can protect yourself against chemical hazards by:
- Reading container labels, material safety data sheets (MSDS's) and safe-work instructions before you handle a chemical.
- Using specified personal protective equipment (PPE) that may include chemical splash goggles, a respirator, safety gloves, aprons, steel-toed shoes, safety glasses with side shields, etc. Ensure the PPE fits properly and you are trained in its use.
- Inspecting all PPE before you use them. Look for defects in the equipment such as cracks, missing parts, rips, etc. Ensure your respirator has the proper chemical cartridges for the particular chemical hazard. Change cartridges when it is necessary.
- Knowing the location of safety showers and eyewash stations and how to use them.
- Washing your hands before eating, especially after handling chemicals.
- Leaving your contaminated clothing at work. If you leave clothes home you can expose your family to hazards.

ETHICAL MOMENTS:

ETHICAL BEHAVIOR:
SHAPING OUR CULTURE
COMPLIANCE CHAMPION PROGRAM

Who?

• Individual identified by leadership that truly believes in compliance.
• They are not compliance officers, but liaisons between the OCE and your business/group/project

What does a Compliance Champion do?

• The CC is responsible for bringing awareness of the compliance program to their business/department/project/group
• Help identify major areas of exposure
• Encourage employees to speak up whenever they encounter potential violations
• Continue to reinforce the Code of Business Conduct

MEASURING EFFECTIVENESS

You know your compliance training program is effective because...

A. We measure carefully and gather hard data
B. We have anecdotal evidence but no hard data
C. Actually, we don’t know if our program is effective
D. Something else...
ARE YOU SUCCESSFUL?

Cumulative completion uptake growth year after year

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2015</th>
<th>2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>92%</td>
<td>94%</td>
<td>96%</td>
<td></td>
</tr>
</tbody>
</table>

Percentage represents average completion of all courses launched each year by course closure.

Code of Conduct understanding

<table>
<thead>
<tr>
<th>Measured criteria</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>The course is helpful to me doing my job</td>
<td>88%</td>
<td>88%</td>
<td>89%</td>
<td>87%</td>
</tr>
<tr>
<td>The content is interactive and engaging</td>
<td>92%</td>
<td>94%</td>
<td>94%</td>
<td>95%</td>
</tr>
</tbody>
</table>

*Results based on multiple survey tools launched from 2013 to 2017 and represent the top 3 results on a scale of 1-5 for the question: The Code of Conduct has been explained to me so that I understand it.

WHAT GETS MEASURED?

CURRENT APPROACH TO MEASURING EFFECTIVENESS

Most Frequently Tracked Metrics

Which of the following metrics do you use to demonstrate the effectiveness of your compliance and/or ethics training program?

- Training Completion: 90%
- Hotline Calls: 59%
- Allegations Received: 55%
- Improvement in Culture: 53%
- Employee Satisfaction: 40%
- Functional/ Business Partner Satisfaction: 23%
- Post-Training Tests: 17%
- Regulatory Approval: 17%
- Employee Behavior Change: 12%

Few Organizations Track Application

Despite being the leading measure of training effectiveness, employee behavior change (e.g. application of compliance teachings) is the least tracked metric.

Source CEB 2013
DID YOU CHECK FOR GAPS?

The chart below shows the percentage scores in each of the 15 dilemmas. The dilemmas which had the lowest percentage scores overall are highlighted in orange below and are examined in more details on the following pages.

Markets Like Numbers...

<table>
<thead>
<tr>
<th>Country</th>
<th>0-20%</th>
<th>21-40%</th>
<th>41-60%</th>
<th>41-80%</th>
<th>81-100%</th>
</tr>
</thead>
<tbody>
<tr>
<td>China</td>
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<td>1.39%</td>
<td>4.33%</td>
<td>40.55%</td>
<td>51.53%</td>
</tr>
<tr>
<td>Germany</td>
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<td>4.86%</td>
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<tr>
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<td>0.86%</td>
<td>15.98%</td>
<td>50.88%</td>
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<tr>
<td>India</td>
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<td>14.04%</td>
<td>51.13%</td>
<td>31.64%</td>
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<tr>
<td>Spain</td>
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<td>61.92%</td>
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<td>0.53%</td>
<td>1.68%</td>
<td>50.80%</td>
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<td>Slovenia</td>
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<td>0.83%</td>
<td>9.35%</td>
<td>53.12%</td>
<td>34.70%</td>
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<tr>
<td>Canada</td>
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<td>0.29%</td>
<td>5.07%</td>
<td>45.30%</td>
<td>49.35%</td>
</tr>
<tr>
<td>Turkey</td>
<td>0.22%</td>
<td>0.95%</td>
<td>7.00%</td>
<td>44.04%</td>
<td>45.77%</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>0.15%</td>
<td>0.07%</td>
<td>4.76%</td>
<td>40.77%</td>
<td>54.24%</td>
</tr>
<tr>
<td>Egypt</td>
<td>1.16%</td>
<td>8.15%</td>
<td>20.93%</td>
<td>43.14%</td>
<td>26.40%</td>
</tr>
<tr>
<td>Grand Total</td>
<td>0.18%</td>
<td>1.13%</td>
<td>7.65%</td>
<td>45.15%</td>
<td>45.89%</td>
</tr>
</tbody>
</table>

Scoring: Above 80% shows highest level of knowledge, Between 61% and 80% shows a high level of knowledge, 60% or less shows a lower level of knowledge.
DRIVING CULTURE

We have a strong culture of compliance.

What executives like

Welcome

As an executive manager you are ultimately responsible for ensuring that you and your team act with integrity, enabling us to earn and maintain the trust of our patients, shareholders, and healthcare partners.

This personal training will help you understand what is involved.
THEY DETERMINE THEIR OWN TRAINING NEEDS

Main Menu

- I&C overview
- Creating and maintaining a culture of integrity
- What's expected of you as a leader?
- Know and manage risks
- Red flags and what they can do for you
- How can you learn from the mistakes/successes of others?
- How integrity fits do you feel now? (Penultimate topic)
- Final thoughts (Final topics)

NOVARTIS

WHAT DOES “IN GOOD FAITH” MEAN?
You sincerely believe what you’re saying is true, even if you don’t have all the details.

If you raise a concern in good faith
YOU ARE PROTECTED.

We do not tolerate retaliation.

If you
- Talk to a compliance liaison
- Ask your manager
- If you
- Tell your manager
- Tell everyone
- Tell a friend

because you spoke up.

And if anyone tries
- Call compliance immediately
- Sue them
- Tell the appropriate action

Louis Berger
ANTI-CORRUPTION

Louis Berger's Global Anti-Corruption Policy

Louis Berger conducts business with integrity. That means that we don’t bribe, we keep accurate books and records, and we carefully manage potentially risky situations. This guide helps you understand your obligations under our Global Anti-Corruption Policy, but it isn’t a substitute for it — so make sure you read and know the full Policy, too.

**No Bribery**
Never give, promise, offer, or authorize payment of anything of value to get or keep business or secure a business advantage — especially when working with government officials.

**Accurate Books & Records**
Record all transactions transparently and in alignment with our processes. Never have any “off the books” accounts or other unrecorded funds.

**Guest Travel**
Only travel to pay for travel expenses when it’s for a legitimate business purpose and reasonable for the person’s expenses.

**Gifts and Entertainment**
Gifts and entertainment should be appropriate for the culture of the country where the gift or entertainment is being given. Gifts and entertainment should be of reasonable value and not exceed what is considered customary. Gifts and entertainment should never be allowed to create a conflict of interest.

**Government Hires**
Gifts and entertainment should be given with the understanding that the recipient is not obligated to enter into a business relationship with Louis Berger.

**Due Diligence**
It is important to understand the potential risks associated with doing business in a particular country and to take steps to mitigate those risks.

**Charitable Donations**
Charitable contributions should be made only to nonprofit organizations and should be made in the name of the organization and not in the name of an individual.

**Political Contributions**
Political contributions should be made only to legal political parties and should be made in the name of the organization and not in the name of an individual.

For more help: ethics@louisberger.com
Thank You!