Building a Global Compliance Training Program
2018
Innovation and Strategy

Britta Luescher  Director Compliance
Peggy Dolin  SANOFI
Nichole Pitts  Louis Berger
Matt Plass  interactive

Moderator

FOR TODAY
Agenda
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...

Trainings Strategies & Guidelines

- Internal Associates
- External Contractors
- Third Parties and External Service Providers

© Novartis
DO YOU TALK WITH YOUR PARTNERS?

All new hires: On-boarding course “Compliance@Novartis”

Novartis

COMPLIANCE VISION

For all employees to understand, commit to, and see the value of 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:
- 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.
- Speak up when they see something that could create a risk for the company.
- Ensure that compliance and the transfer of knowledge are effective to manage risks and support business objectives.
- 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. A necessary evil
B. A useful reminder of the rules
C. A great way to boost our compliance culture
D. Something else...

BUILDING THE COMPLIANCE BRAND
HOW SANOFI APPLIES THE LEARNING CURVE

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

TIME

LEARNING

Awareness

Understanding

Acceptance

Adoption

1. Kick-Off Campaign
2. 100% Workforce Competency
3. Compliance is Everyday
4. Sustain the Buzz
5. Support Me in the Moment
6. Keep Me Updated

Email Template Kit January
Primary Learning January-February
Intranet Banner Ad All Year
Video Booster March June Sept Dec
Infographics and Performance Support All Year
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...

Always
Sometimes
Never
Something else
ARE YOU SETTING STANDARDS?

- Real-time reporting (24/7)
- Increased use of interactivity
- Targeted function specific launches
- Responsive framework
- Improved learner experience

ARE YOU ASKING THE RIGHT QUESTIONS?

Designing a local training plan

TRAINING LANGUAGE IS A KEY ELEMENT

1 COUNTRY ≠ 1 LANGUAGE = NO

GIVE THE CHOICE TO THE LEARNER
SAFETY & ETHICS MOMENTS

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/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...

- We measure carefully and gather hard data
- We have anecdotal evidence but no hard data
- Actually, we don’t know if our program is effective
- 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>Percentage</td>
<td>94%</td>
<td>96%</td>
<td>97.5%</td>
</tr>
</tbody>
</table>

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

The course is helpful to me doing my job

<table>
<thead>
<tr>
<th></th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage</td>
<td>86%</td>
<td>88%</td>
<td>89%</td>
<td>87%</td>
</tr>
</tbody>
</table>

The content is interactive and engaging

<table>
<thead>
<tr>
<th></th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage</td>
<td>91%</td>
<td>94%</td>
<td>94%</td>
<td>95%</td>
</tr>
</tbody>
</table>

Code of Conduct understanding

<table>
<thead>
<tr>
<th></th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage</td>
<td>68%</td>
<td>92%</td>
<td>95%</td>
<td></td>
</tr>
</tbody>
</table>

* Results based on multiple survey tools launched from 2013 to 2017 and represent the top 2 results on a scale of 1-5 for the question: The Code of Conduct has been explained to me so that I understand it.

Source: CEB 2013

WHAT GETS MEASURED?

CURRENT APPROACH TO MEASURING EFFECTIVENESS

Most Frequently, Standard Metrics

- Performance
- Compliance
- Reporting
- Feedback

Less Frequently

- Behavior
- Knowledge
- Attitude
- Skills
- Engagement

Novartis
DID YOU CHECK FOR GAPS?

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

- DRIVING CULTURE

We have a strong culture of compliance.

MARKETS LIKE NUMBERS

<table>
<thead>
<tr>
<th>Country</th>
<th>0-20%</th>
<th>21-40%</th>
<th>41-60%</th>
<th>61-80%</th>
<th>81-100%</th>
</tr>
</thead>
<tbody>
<tr>
<td>China</td>
<td>0.17%</td>
<td>1.39%</td>
<td>6.33%</td>
<td>40.59%</td>
<td>51.53%</td>
</tr>
<tr>
<td>Germany</td>
<td>0.03%</td>
<td>0.39%</td>
<td>4.86%</td>
<td>44.54%</td>
<td>50.18%</td>
</tr>
<tr>
<td>Japan</td>
<td>0.06%</td>
<td>0.88%</td>
<td>15.98%</td>
<td>50.88%</td>
<td>32.21%</td>
</tr>
<tr>
<td>India</td>
<td>0.34%</td>
<td>2.81%</td>
<td>14.04%</td>
<td>51.13%</td>
<td>31.68%</td>
</tr>
<tr>
<td>Austria</td>
<td>0.37%</td>
<td>0.45%</td>
<td>7.22%</td>
<td>50.33%</td>
<td>41.93%</td>
</tr>
<tr>
<td>Italy</td>
<td>0.07%</td>
<td>0.45%</td>
<td>7.22%</td>
<td>50.33%</td>
<td>41.93%</td>
</tr>
<tr>
<td>Spain</td>
<td>0.05%</td>
<td>0.64%</td>
<td>8.39%</td>
<td>52.15%</td>
<td>38.67%</td>
</tr>
<tr>
<td>Russian Federation</td>
<td>0.12%</td>
<td>0.39%</td>
<td>6.68%</td>
<td>52.15%</td>
<td>41.93%</td>
</tr>
<tr>
<td>Slovenia</td>
<td>0.08%</td>
<td>0.45%</td>
<td>5.15%</td>
<td>54.67%</td>
<td>41.93%</td>
</tr>
<tr>
<td>Canada</td>
<td>0.00%</td>
<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>46.06%</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>20.95%</td>
<td>43.14%</td>
<td>26.60%</td>
</tr>
</tbody>
</table>

Scoring: Above 80% shows highest level of knowledge, between 61% and 80% shows high level of knowledge, 60% or less shows lower level of knowledge.
WHAT EXECUTIVES LIKE

They determine their own training needs

What does "in good faith" mean?

We do not tolerate retaliation.

You are protected.
Thank You!