Building a Global Compliance Training Program
2018
Innovation and Strategy

Britta Luescher
Director Compliance

Peggy Dolin
Policies, Education & Training Director in Global Ethics & Business Integrity

Nichole Pitts
Vice President, Compliance and Ethics Officer

Moderator
Matt Plass

Director Compliance

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
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
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.

Chief Executive Officer, US.

Matt 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.
Agenda for Today

1. Challenges for 2018
2. Governance & Strategy
3. Building the Compliance Brand
4. Reaching Your People
5. Measuring Effectiveness
6. Driving Culture

CHALLENGES FOR 2018

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?

![Diagram showing on-boarding course](image)

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

---

**Louis Berger**

**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:

- 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 training 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.
BUILDING THE COMPLIANCE BRAND

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…

HOW SANOFI APPLIES THE LEARNING CURVE

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

TIME

LEARNING
**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

Technology evolution

Use of real Novartis cases

Pre-knowledge checks

Targeted function specific launches

Real-time reporting (24/7)

Increased use of "interactivity", scoring

In-course statistics to optimize and design content

Targeted content through Profiling

Responsive framework

Improved learner experience

2012 2013 2014 2015 2016 2017

ARE YOU ASKING THE RIGHT QUESTIONS?

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 need/gaps analysis
3. Select training content and frequency
4. Select training tool, resources and delivery methods
TRAINING LANGUAGE IS A KEY ELEMENT

1 COUNTRY = 1 LANGUAGE

Essentials on Ethics in the Workplace - English
Essentials on Ethics in the Workplace - Arabic
Essentials on Ethics in the Workplace - Bulgarian
Essentials on Ethics in the Workplace - Chinese
Essentials on Ethics in the Workplace - Czech
Essentials on Ethics in the Workplace - French
Essentials on Ethics in the Workplace - German
Essentials on Ethics in the Workplace - Hungarian
Essentials on Ethics in the Workplace - Indonesian
Essentials on Ethics in the Workplace - Italian
Essentials on Ethics in the Workplace - Japanese
Essentials on Ethics in the Workplace - Korean
Essentials on Ethics in the Workplace - Polish
Essentials on Ethics in the Workplace - Portuguese
Essentials on Ethics in the Workplace - Romanian
Essentials on Ethics in the Workplace - Russian
Essentials on Ethics in the Workplace - Spanish
Essentials on Ethics in the Workplace - Thai
Essentials on Ethics in the Workplace - Turkish

GIVE THE CHOICE TO THE LEARNER

SANOFI
SAFETY & ETHICS MOMENTS

MEETING MOMENTS
FEBRUARY 2017

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 foams, 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 use at work are facility-specific solvents, laboratory chemicals, fuels, paint, office copier chemicals, correction fluid, lubricants and cleansers.
**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...

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

Cumulative completion uptake growth year after year

<table>
<thead>
<tr>
<th>Year</th>
<th>92%</th>
<th>94%</th>
<th>95%</th>
<th>96%</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td></td>
<td></td>
<td></td>
<td>97.5%</td>
</tr>
<tr>
<td>2015</td>
<td></td>
<td></td>
<td>96%</td>
<td></td>
</tr>
<tr>
<td>2014</td>
<td></td>
<td>94%</td>
<td></td>
<td></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>Year</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td></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>Year</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>91%</td>
<td>94%</td>
<td>94%</td>
<td>95%</td>
</tr>
</tbody>
</table>

**Code of Conduct understanding**

<table>
<thead>
<tr>
<th>Measure</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Global top norm</td>
<td>68%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Company wide result</td>
<td>52%</td>
<td>55%</td>
<td>55%</td>
<td>55%</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.

**Constant course content engagement**

<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>86%</td>
<td>88%</td>
<td>89%</td>
<td>87%</td>
</tr>
<tr>
<td>The content is interactive and engaging</td>
<td>91%</td>
<td>94%</td>
<td>94%</td>
<td>95%</td>
</tr>
</tbody>
</table>

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?

<table>
<thead>
<tr>
<th>Metric</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Training Completion</td>
<td>90%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hotline Calls</td>
<td>59%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Allegations Received</td>
<td>55%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Improvement in Culture</td>
<td>53%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employees Satisfaction</td>
<td>40%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Functional/ Business Partner Satisfaction</td>
<td>23%</td>
<td>17%</td>
<td>17%</td>
<td>17%</td>
</tr>
<tr>
<td>Post-Training Tests</td>
<td>23%</td>
<td>17%</td>
<td>17%</td>
<td>12%</td>
</tr>
<tr>
<td>Regulatory Approval</td>
<td>23%</td>
<td>17%</td>
<td>17%</td>
<td>12%</td>
</tr>
<tr>
<td>Employee Behavior Change</td>
<td>23%</td>
<td>17%</td>
<td>17%</td>
<td>12%</td>
</tr>
</tbody>
</table>

* Few Organizations Track Application
- Despite being the leading metric for measuring 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:

- It's not our concern
- A culture of right behavior
- Too much paperwork
- A good use of information
- A fair recompense
- A charitable donation
- Proxy action
- A helpful arrangement
- A good profit
- A matter of disclosure
- The company owes me
- Unwelcome attention
- A different result
- Averse Events
- For the right reasons

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>4.46%</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>50.84%</td>
<td>34.13%</td>
</tr>
<tr>
<td>India</td>
<td>0.39%</td>
<td>2.61%</td>
<td>18.09%</td>
<td>51.13%</td>
<td>31.58%</td>
</tr>
<tr>
<td>Austria</td>
<td>0.07%</td>
<td>0.45%</td>
<td>3.22%</td>
<td>50.33%</td>
<td>41.93%</td>
</tr>
<tr>
<td>Italy</td>
<td>0.05%</td>
<td>0.43%</td>
<td>3.33%</td>
<td>52.15%</td>
<td>38.78%</td>
</tr>
<tr>
<td>Spain</td>
<td>0.00%</td>
<td>0.16%</td>
<td>2.43%</td>
<td>51.15%</td>
<td>41.93%</td>
</tr>
<tr>
<td>Russian Federation</td>
<td>0.12%</td>
<td>0.53%</td>
<td>4.48%</td>
<td>50.40%</td>
<td>41.87%</td>
</tr>
<tr>
<td>Slovenia</td>
<td>0.00%</td>
<td>0.63%</td>
<td>9.35%</td>
<td>53.12%</td>
<td>36.78%</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>0.93%</td>
<td>7.00%</td>
<td>46.04%</td>
<td>45.77%</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>0.15%</td>
<td>0.07%</td>
<td>4.78%</td>
<td>40.77%</td>
<td>54.29%</td>
</tr>
<tr>
<td>Egypt</td>
<td>0.16%</td>
<td>8.11%</td>
<td>20.93%</td>
<td>43.14%</td>
<td>21.40%</td>
</tr>
<tr>
<td>Grand Total</td>
<td>0.38%</td>
<td>1.13%</td>
<td>7.65%</td>
<td>45.15%</td>
<td>45.87%</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.

Agree       Partly Agree      Disagree     Something else...
A            B                C            D

WHAT EXECUTIVES LIKE
THEY DETERMINE THEIR OWN TRAINING NEEDS

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 successes and failures of others?

How integrity fits do you feel now?

(Penultimate topic)

Final thoughts (Final topics)

---

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.
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 offer to pay for travel expenses when it’s for a legitimate business purpose and reservation for the person's benefit. Furthermore, we require our guests to attend business activities, we don't give per diem cash, and we don't pay for meals, tips or other fringe and facility costs.

Charitable Donations
Fill out the Charitable Donation Application Form and get approval from your DRAM/Anti-Corruption Officer before committing to any donations.

Government Hires
Get written approval from HR and the Office of Compliance and Ethics before engaging or making an offer of employment to a government official.

Gifts and Entertainment
If you're giving a business gift, get approval according to the DRAM/Anti-Corruption policy. If it's not clear, be honest and seek advice before offering anything, even if it's nominal or less than necessary.

Due Diligence
Tell your Compliance & Ethics Officer and Procurement when you identify a new business partner; they'll help you through the due diligence process.

Political Contributions
Get formal approval from the Chief Compliance Officer before offering assistance, equipment, time, or any other help to a political party or politician.

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