

Building a Global Compliance Training Program 2018 Innovation and Strategy



Britta Luescher



Peggy Dolin



Nichole Pitts



Moderator



Matt Plass





Britta Luescher



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



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

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



Vice President, Compliance and Ethics Officer

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.

Moderator



Matt Plass



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?

Being asked to do more for less A	Consolidating and improving our program B	Adapting to changing regulatory environment C	Something else... D
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**GOVERNANCE
& STRATEGY**

How would you describe your compliance training strategy?

Consistent, articulated, measurable A	Confused and inconsistent B	We don't have one. C	Something else... D
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**TRAINING STRATEGIES
& GUIDELINES**



Internal Associates

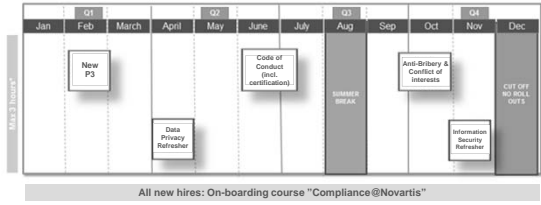


External Contractors



Third Parties and External Service Providers

DO YOU TALK WITH YOUR PARTNERS?



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.

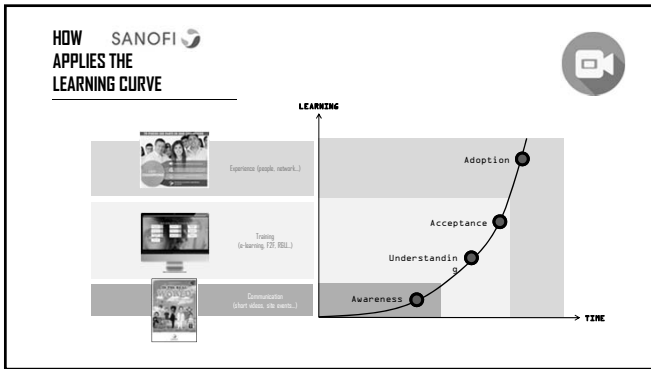
- All employees will:**
- Understand the requirements and risks that pertain to their specific role and demonstrate the initiative to seek out help, when necessary, to appropriately manage the risks;
 - Speak Up when they see something that could create a risk for the company;
 - Ensure that compliance 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.

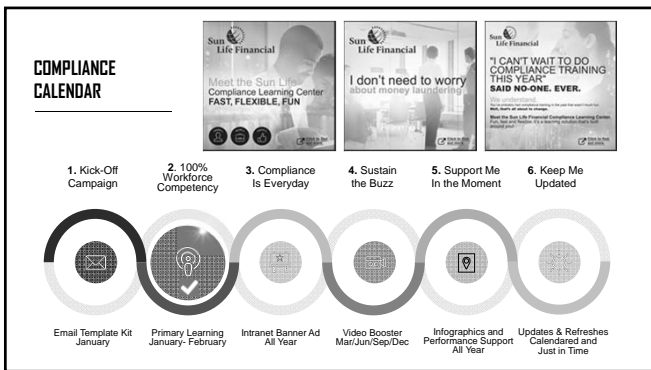


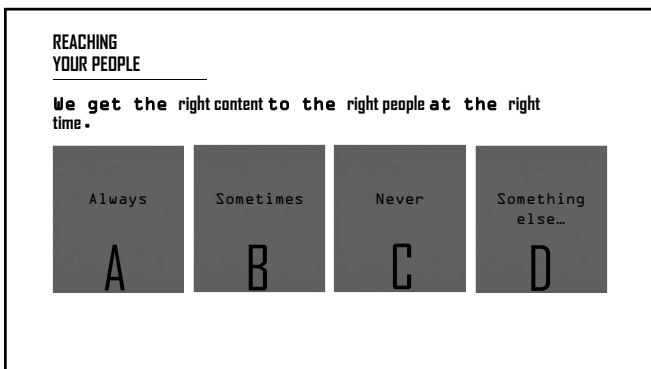
BUILDING THE COMPLIANCE BRAND

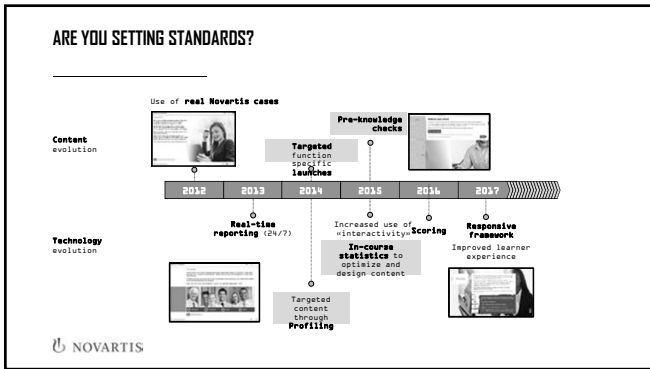
How is compliance training perceived in your organization?

A A necessary evil	B A useful reminder of the rules	C A great way to boost our compliance culture	D Something else...
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ARE YOU ASKING THE RIGHT QUESTIONS?

Group IEC
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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TRAINING LANGUAGE IS A KEY ELEMENT

1 COUNTRY = 1 LANGUAGE = NO

GIVE THE CHOICE TO THE LEARNER

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Essentials on Ethics in the Workplace - English China (32)

Essentials on Ethics in the Workplace - Arabic China (15)

Essentials on Ethics in the Workplace - Bulgarian China (4)

Essentials on Ethics in the Workplace - Chinese China (99)

Essentials on Ethics in the Workplace - Czech China (1)

Essentials on Ethics in the Workplace - French China (6)

Essentials on Ethics in the Workplace - German China (6)

Essentials on Ethics in the Workplace - Hungarian China (4)

Essentials on Ethics in the Workplace - Indonesian China (5)

Essentials on Ethics in the Workplace - Italian China (3)

Essentials on Ethics in the Workplace - Japanese China (3)

Essentials on Ethics in the Workplace - Korean China (3)

Essentials on Ethics in the Workplace - Polish China (1)

Essentials on Ethics in the Workplace - Portuguese China (28)

Essentials on Ethics in the Workplace - Romanian China (3)

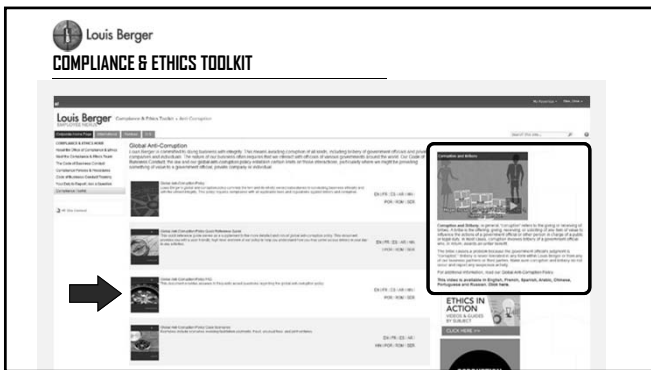
Essentials on Ethics in the Workplace - Russian China (1)

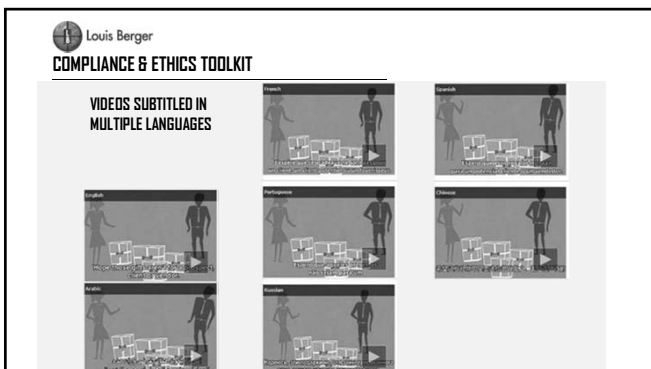
Essentials on Ethics in the Workplace - Spanish China (6)

Essentials on Ethics in the Workplace - Thai China (1)

Essentials on Ethics in the Workplace - Turkish China (3)








<p>1 Louis Berger SAFETY & ETHICS MOMENTS</p>	<p>COMPLIANCE & ETHICS</p> <p>Week 1: Overseeing Construction</p> <p>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 Code of Business Conduct (CBC). Through this process, Louis Berger takes responsibility 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.</p>	<p>HEALTH & SAFETY</p> <p>Week 2: Work at Expense</p> <p>We are exposed to chemicals by these ways:</p> <ul style="list-style-type: none"> 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 on the work site when there are asbestos containers or not washing hands before eating. Absorption: Skin contact with a chemical - Example: Contact (ceramita) on an eye infection. Injection: Forcing an object into the body through a needle or a high-pressure device - Example: Needle stick or reuse of a high-pressure washer.
<p>1 Louis Berger MEETING MOMENTS</p> <p>FEBRUARY 2017 HAZ CHU/AQU CLIQUEZ/30</p> <p>Corporate Citizenship</p> <p>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.</p> <p>Chemical Safety</p> <p>Chemicals are a major part of our everyday life — at home and at work. Examples include toxins, cosmetics, solvents and numerous other substances. As long as we take proper precautions, these substances can be handled safely.</p> <p>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 cosmetics.</p>	<p>COMPLIANCE & ETHICS</p> <p>TH NK SAFETY</p> <p>Responsibility</p> <p>To protect, preserve and enhance operations, Louis Berger is committed to the efficient use of resources and the efficient use of funds. This should be done in a responsible manner. Individuals responsible to report to your supervisor and might result in the fact:</p>	<p>Week 3: How to protect against Chemical Hazards</p> <p>You can protect yourself against chemical hazards by:</p> <ul style="list-style-type: none"> Reading container labels, material safety data sheets (MSDS) 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, apron, steel-toed shoes, safety glasses with side shields, etc. Ensure the PPE fits properly and you are trained to its use. Inspecting all PPE before you use them. Look for defects in the equipment such as cracks, missing parts, etc. Ensure your supervisor has the proper chemical knowledge for the particular chemical hazard. Change cartridges when a 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 wear clothes home you can expose your family to hazards.

<p>1 Louis Berger</p> 	<p>ETHICAL MOMENTS®:</p> <p>ETHICAL BEHAVIOR: SHAPING OUR CULTURE</p>
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<p>1 Louis Berger</p> <p>COMPLIANCE CHAMPION PROGRAM</p> 	<p>Who?</p> <ul style="list-style-type: none"> Individual identified by leadership that truly believes in compliance. They are not compliance officers, but liaisons between the OCE and your business/group/project <p>What does a Compliance Champion do?</p> <ul style="list-style-type: none"> 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
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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

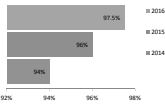
C

Something else...

D

ARE YOU SUCCESSFUL?

Cumulative completion uptake growth year after year



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

Code of Conduct understanding

Global top norm	Company wide result
68%	92-95%*

* 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 established to be so that I understand it."

Constant course content engagement

Measured criteria	2014	2015	2016	2017
The course is helpful to me doing my job	88%	88%	89%	87%
The content is interactive and engaging	91%	94%	94%	93%

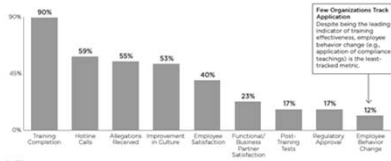


WHAT GETS MEASURED?

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?

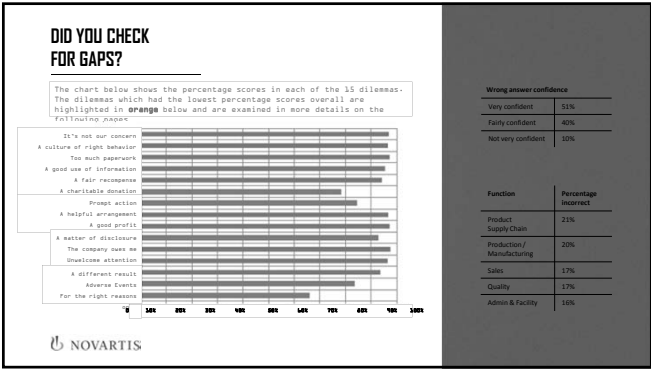


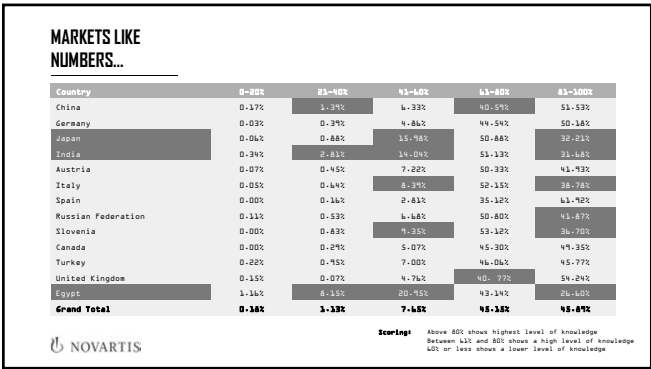
Few Organizations Track Application
Despite being the leading indicator of training effectiveness, employee behavior change (e.g., application of compliance teachings) is the least-tracked metric.

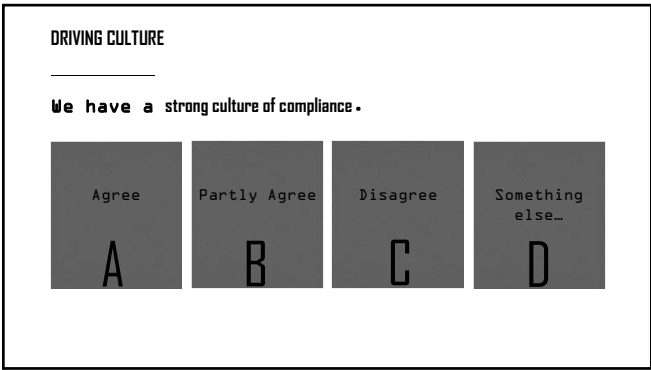
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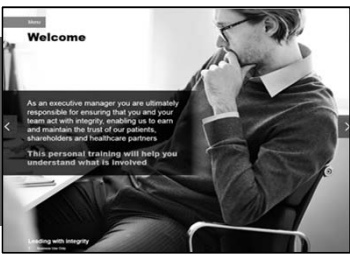
Source CEB 2013







WHAT EXECUTIVES LIKE

Welcome

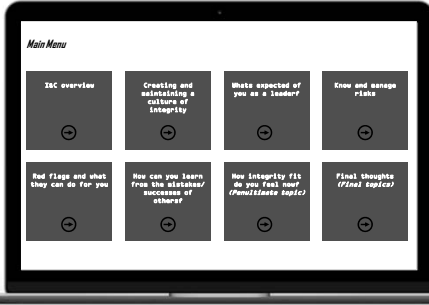
As an executive manager you are ultimately responsible for ensuring that you and your team act with integrity, enabling us to earn and maintain the trust of our patients, shareholders and healthcare partners.

This personal training will help you understand what is involved.

Leading with integrity

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THEY DETERMINE THEIR OWN TRAINING NEEDS



Main Menu

- ZAC 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 in: you feel good (Pamela's story)
- 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.

because you spoke up.

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Sistema de Gestión de Cumplimiento

PLANIFICAR, REALIZAR, COMPROBAR, AJUSTAR

Para obtener más información, póngase en contacto con ethics@louberger.com

Planificar
Identificar los riesgos, los controles y los objetivos

Realizar
Proporcionar los recursos, informar, formar y ejecutar

Comprobar
Realizar seguimiento del progreso y evaluar los resultados

Ajustar
Reparar y modificar

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 business's business, and we're responsible for the expenses. We require our guests to attend business meetings, we don't give our guests gifts, and we don't pay for our guests' airfare and family to come.

Gifts and Entertainment
If you're giving a business gift, get approval according to the ERMAA Authority matrix and accounting & management. Only give if there's no intent or implied promise and you're not expecting anything in return. In addition, make sure any gift you want to give is:

- Not over value
- Not
- Not
- Not
- Not

Government Hires
Get written approval from HR and the Office of Compliance and Ethics before engaging or meeting an office of employment for a government official.

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

Charitable Donations
Fill out the Charitable Contribution Approval Form and get approval from your ERMAA Authority. Make sure the donation is for a charitable organization.

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

For more help: ethics@louberger.com

Thank You!
