Building a Global Compliance Training Program
2018
Innovation and Strategy

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.

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.

Chief Executive Officer, US.
Matt Plass has an extensive background in training, 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.

Director, Education & Training Director in Global Ethics & Business Integrity
Peggy Dolin received a Bachelor degree in Biology from Paris University. She has 20 years of professional experience with Novartis. Her expertise in clinical research in clinical research includes a leadership role in charge of clinical parts of central US and European registration decades.

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 programs
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...

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 use 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 employee-managed transfer of knowledge are effective to manage risks and support business objectives;
- Sound assessments to the compliance risks 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
B: A useful reminder of the rules
C: A great way to boost our compliance culture
D: Something else...

A B C D
COMPLIANCE CALENDAR

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
Intranet Banner Ad
Video Booster
Infographics
Performance Support
Updates & Refreshes

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?**

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

**ARE YOU ASKING THE RIGHT QUESTIONS?**

- Use of real Novartis cases

**TRAINING LANGUAGE IS A KEY ELEMENT**

- 1 COUNTRY = 1 LANGUAGE = NO

- Give the choice to the learner

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**Content evolution**

- Technology evolution

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**Designing a local training plan**

- A training plan is a document that guides the planning and delivery of a specific training intervention. The plan outlines the goals, objectives, content, methods, and evaluation criteria.

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**1 LANGUAGE IS A KEY ELEMENT**

- 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/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
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>Year</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>92%</td>
<td>94%</td>
<td>96%</td>
<td>98%</td>
<td></td>
</tr>
</tbody>
</table>

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

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>
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<tbody>
<tr>
<td>86%</td>
<td>88%</td>
<td>89%</td>
<td>87%</td>
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</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>91%</td>
<td>94%</td>
<td>94%</td>
<td>95%</td>
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</tbody>
</table>

Code of Conduct understanding:

<table>
<thead>
<tr>
<th>Year</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>68%</td>
<td>92%</td>
<td>94%</td>
<td>95%</td>
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* 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.

WHAT GETS MEASURED?

CURRENT APPROACH TO MEASURING EFFECTIVENESS

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
- Prompt action
- A helpful arrangement
- A good profit
- A matter of disclosure
- The company owes me
- Unwelcome attention
- A different result
- Adverse Events
- For the right reasons only

**Function Percentage**

<table>
<thead>
<tr>
<th></th>
<th>Incorrect</th>
<th>Product</th>
<th>Supply Chain</th>
<th>Production / Manufacturing</th>
<th>Sales</th>
<th>Quality</th>
<th>Admin &amp; Facility</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>21%</td>
<td>20%</td>
<td>17%</td>
<td>17%</td>
<td>16%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**MARKETS LIKE NUMBERS…**

**Country** 0-20% 21-40% 41-60% 61-80% 81-100%

- China: 0.17% 1.39% 6.33% 40.59% 51.53%
- Germany: 0.03% 0.39% 4.86% 44.54% 50.18%
- Japan: 0.06% 0.88% 15.98% 50.88% 32.21%
- India: 0.34% 2.81% 14.04% 51.13% 31.68%
- Austria: 0.07% 0.45% 7.22% 50.33% 41.93%
- Italy: 0.05% 0.64% 8.39% 52.15% 38.78%
- Spain: 0.00% 0.16% 2.81% 35.12% 61.92%
- Russian Federation: 0.11% 0.53% 6.68% 50.80% 41.87%
- Slovenia: 0.00% 0.83% 9.35% 53.12% 36.70%
- Canada: 0.00% 0.29% 5.07% 45.30% 49.35%
- Turkey: 0.22% 0.95% 7.00% 46.06% 45.77%
- United Kingdom: 0.15% 0.07% 4.76% 40.77% 54.24%
- Egypt: 1.16% 8.15% 20.95% 43.14% 26.60%

**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

We have a strong culture of compliance.
Thank You!