Global Compliance Programs

Applying the positive: How to remove the Complexity, Mystery & Negative Stigma around your Program.

Susan Du Becker, Cisco Systems BV - Global Compliance Enablement
SCCE Berlin, Germany. March 11th, 2019

Agenda

➢ How to understand your company culture, critical focus areas and, what is important for your business
➢ How to identify and garner support from internal partners
➢ How to make your compliance program relevant to get employees on board
Complexity – Understanding & Positioning

Environment
What: Constrained, Rules, hierarchical, regulated or, empowered, flexible

Characteristics
Culture: Command & Control, closed, structured, top heavy, non inclusive, uninterested, disruptive, combative, Or Values based, open culture, empowerment, trust, principles

Experience
Monitored, controlled, ‘by the book’, industry regulated or Risk Tolerance, company requirements, industry standards, your marketplace, stakeholders

Address Your Unknown

Compliance – Removing complexity

Governance   Audit / Board Committees   Executive Management
Tone from the Top

Experience   Leaders Ownership/Tone   Employees Accountability

Compliance Program Characteristics Principles & Values Responsibility & Trust
Environment Culture & Drive Openness & empowerment

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Who are you?

Understanding your company, your scope & your culture

critical focus areas

Understanding your Business – Relevancy
Adding Value

How to identify and garner support from internal partners

Program Outline; be definitive – An Example

Cisco Compliance Program

<table>
<thead>
<tr>
<th>Objective / Strategy</th>
<th>Understanding our business</th>
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<tbody>
<tr>
<td>What are we trying to solve for</td>
<td>• Compliance &amp; Ethics program that meets regulatory &amp; financial requirements</td>
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<tr>
<td></td>
<td>• Reflect Cisco values and, culture</td>
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<td></td>
<td>• Risk based, business focused with ownership</td>
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<td>• No over pivoting - respect the business &amp; client</td>
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<thead>
<tr>
<th>Stakeholders</th>
<th>Relationship with the audience</th>
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<tr>
<td>Four tier interlock</td>
<td>• Steering Committee, Audit Committee &amp; Executive for high level information, directionality &amp; escalation</td>
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<tr>
<td></td>
<td>• Senior Management, General population</td>
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<tr>
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<td>• Country &amp; Functional focus</td>
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<thead>
<tr>
<th>Methodology</th>
<th>How do we do this</th>
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<tr>
<td>Framework, tools</td>
<td>• Regular cadence meetings (virtual/F2F), up and down feedback &amp; discussion</td>
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<td>• Tools – web based: VoD, Webex/Telepresence, email, social media, automated tools, Compliance ambassadors, Country Teams, ‘friend’ of compliance &amp; ethics</td>
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<td>• Ownership as part of DNA. Drive down into the organization.</td>
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<tr>
<th>Effectiveness</th>
<th>Measurements of Success</th>
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<tr>
<td>Data and information used in analysis, business intelligence and, as a framework for solutions</td>
<td>• Dashboards, Matrices, directionality, regular reporting, automated tools &amp; measurement</td>
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<td></td>
<td>• Support for the business &amp; inter-dependent relationships</td>
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<td>• Respecting our focus – Reputational, Financial and Criminal</td>
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</tbody>
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What is important to YOU?

What is important to YOU?

Health Services  Utilities  Energy  Financial services  Automotive  Security?

Government  Products?  Supply Chain  Retail  Sports/Entertainment  Manufacturing

Global Presence  Education  Hospitality  Insurance  Demand Creation?

Finance  Relevancy & Delivery  How to make your compliance program relevant to get employees on board

Partnerships  Utilities  Energy  Financial services  Automotive  Security?

Government  Products?  Supply Chain  Retail  Sports/Entertainment  Manufacturing

Global Presence  Education  Hospitality  Insurance  Demand Creation?

Finance  Relevancy & Delivery  How to make your compliance program relevant to get employees on board

Partnerships
Knowing your audience – Delivery

MY ICEBERG IS MELTING!

Recognizing & addressing the right audience

- AC/Board – concerned with highest level information, is the company safe?
- The Executive – Are we addressing the relevant issues for the company, do we understand our eco system and are addressing accordingly?
- Management – are we focused on the correct risks and, are mitigating the priorities for the business?
- All – are we bringing forward concerns, identifying issues, highlighting gaps where we need to?

Effectiveness – Delivery & Measurements
Food for Thought

Addressing your audience

Key Points for Consideration

- Know your **Business**, Know your Audience
- Relevancy
- Buy in, make it **interesting** – our world is ‘challenging’
- Did I mention ‘**Relevancy**’?
- Stakeholder **Relationships** are important
- Keep it **Simple** and **REMOVE** complexity – Don’t ‘boil the Ocean’
- We CAN have **tolerance** as well
- Tailor messaging to the right audience – It’s not a mystery

- **RELEVANCY**
BIG Learning

Communicate