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Meet

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Earn CEU Credit

VISIT: WWW.CORPORATECOMPLIANCE.ORG/QUIZ

OR SEE PAGE 38

**Doing the right thing
during downsizing:
The hows matter**

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SCCE is going green

SCCE conference attendees will NOT automatically receive conference binders. If you would like to purchase conference binders, please choose that option on your conference registration form. Attendees will receive electronic access to course materials prior to the conference as well as a CD onsite with all the conference materials.

ALSO:
**Will the new
Administration
have an impact on
Compliance and Ethics?**

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Letter from the CEO



Compliance Awareness Surveys

I think compliance/ethics awareness surveys are an excellent way to establish a baseline and determine progress. They are also helpful to show management where you currently are with regard to employee awareness and attitudes.

Most management assumes everyone is knowledgeable, happy, and trustworthy. The survey results can help you substantiate that more specific compliance and ethics activities need to take place. I also think you don't need to ask too many questions to get the information you need. As is often the case, some would suggest that you have to beat this thing to death to achieve perfection. I don't agree that perfection is needed.

Below, I have listed a few sample questions you can use to establish knowledge about the compliance and ethics program. These are questions investigators ask to determine what kind of message you need to be sent when they are determining fines and penalties. They will often ask these questions of employees during investigational interviews. If the employees can't answer these questions, the government investigators assume you are not trying, and that your fines and penalties should be higher. Some of these questions have come directly from investigators.

- What is the name of the compliance or ethics officer?
- Do you know how to report a problem?
- Have you seen the Code of Conduct?
- What is the purpose of the Code of Conduct?

One investigator tells a story where he asked a manager in a meeting who the compliance officer was. After the manager was unable to answer, the investigator gleefully said, "He is sitting right next to you."

These questions can be worded in many different ways. Wording is not important in my opinion. If you get the results

that I think you are going to get, you don't have to get too complicated. If they can't answer these basic questions, then you have what you need to prove that action needs to be taken. Management may not object to basic knowledge questions. They tend to get a little more uncomfortable with the following:

- Have you seen behavior at work that you would consider unethical?
- Do you think we have an ethical culture?
- Do you think management is supportive of the compliance and ethics activities?

I would do the first survey in any way that management is willing to proceed. If they want to hold off on the more sensitive questions, I would just ask the easier questions for now, and come back to the more difficult ones later. I would avoid complex long surveys until I got past the basics. Once your employees can pass the simple test, then I would proceed onto some of the more complex surveys. As is often the case, you will find people who think "more is better." I don't always think that is the case. ■