



# *Compliance & Ethics*

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## ***Meet Mike Lotzof***

**CEO of the  
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# Letter from the CEO

ROY SNELL



## Rhetoric or Real Time Integrity Value Statements, Mission Statements, and Codes of Conduct

I was recently interviewed by a college student who was writing a “thesis paper” on organizations’ commitment to compliance. She had interviewed several organizations and was doing a very good job. She was very impressed with those who had spent a lot of money and could produce a lot of paper. When she interviewed me about our nonprofit organization’s compliance activity, I had an interesting time reflecting on our commitment. I didn’t have pounds of paper or slick videos. However, I was fairly convinced that we could “blow the doors off of anyone” if you could just measure what was really going on, versus who looked the best.

She asked where my conflict of interest statement was and my values statement, and I really couldn’t put my hands on the relevant material as fast as I would have liked. We talked about education for a while. I was feeling a little guilty. I wondered if I was doing enough. Then I told her what we were doing every day to ensure ethical and compliant behavior and I began to become quite self-righteous.

I told her that we don’t edit or look at those documents every day and we don’t have a lot of education. I told her we are better than that. We practice integrity

and ethical behavior every day in every decision. I told her to go and ask any employee what gifts they can accept. They will tell you that we accept nothing. Ask them what is expected of them and if they see leadership doing what is asked of them.

I was somewhat unnerved that we didn’t have a values statement; however, the road is littered with organizations that do, yet don’t have integrity. I told her that I would write a values statement and that it would be quite different from any she had ever seen. This values statement would be a slap in the face to all those companies who develop glossy values statements, who pay \$100,000 for videos, complete with the CEO front and center, who spent millions to say they have integrity . . . but don’t.

### Draft Values Statement:

#### We do the right thing in real time

We don’t talk about doing the right thing . . . We just do it.

We don’t write about doing the right thing . . . We just do it.

We don’t preach about doing the right thing . . . We just do it.

We don’t promise to do the right thing . . . We just do it.

We do the right thing every day. Not just some employees, but all employees. We expect the same from those we do business with and we won’t do business with those who don’t have integrity. We don’t get close to the edge; we avoid the edge altogether. We don’t make exceptions for anyone. We don’t lie, cheat, or steal. We avoid all deception including lying to avoid conflict. We are not into rhetoric; we are into real-time integrity.

These are the kinds of things I think about as I see one more CEO led off in handcuffs, while CNN plays their corporate integrity video. I am tired of the all-show and no-go approach to integrity. I am tired of people getting credit for pounds of paper, spending money and slick videos. ■