

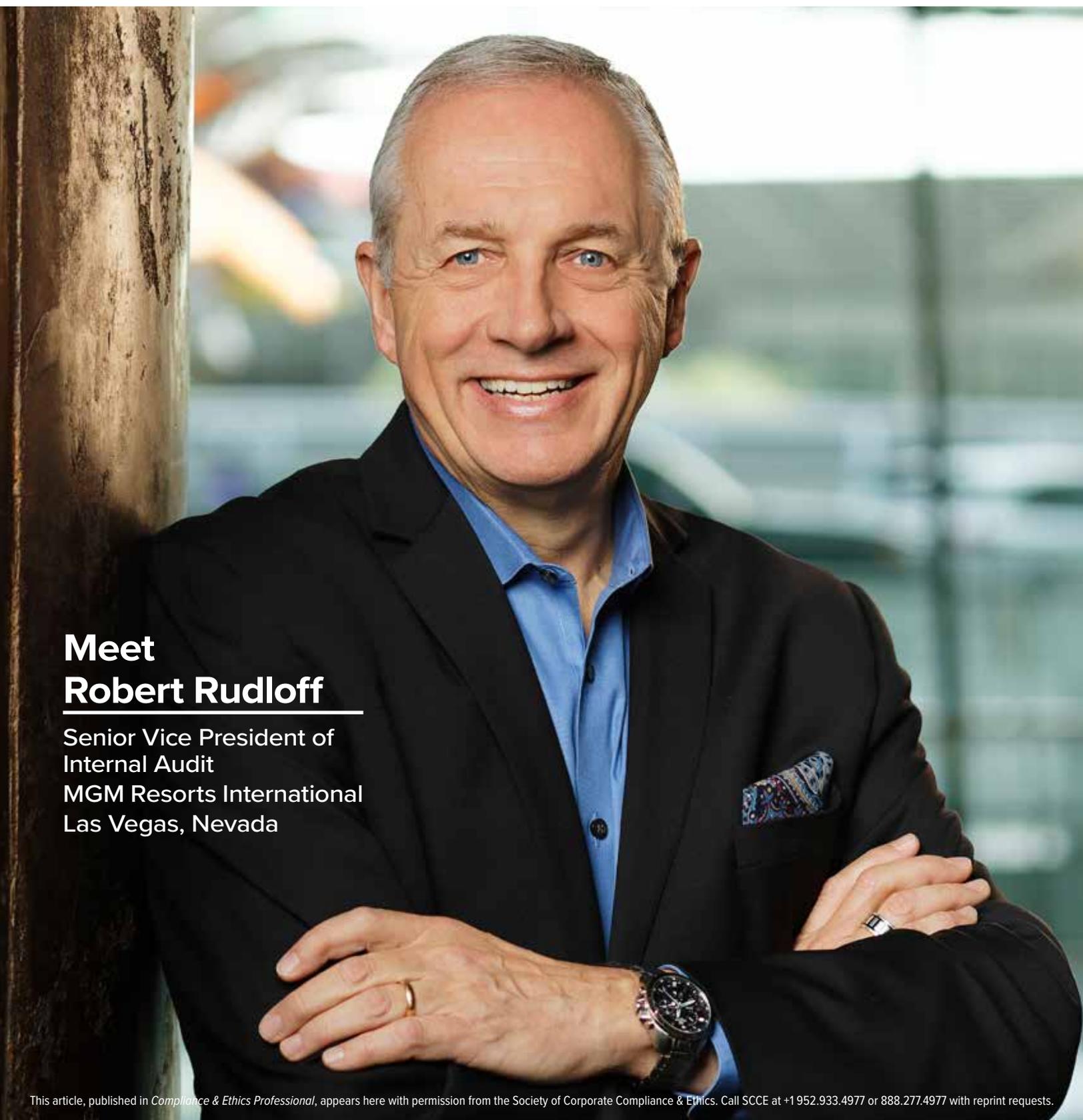


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Compliance & Ethics PROFESSIONAL®

A PUBLICATION OF THE SOCIETY OF CORPORATE COMPLIANCE AND ETHICS

JULY 2018

A portrait of Robert Rudloff, a middle-aged man with short grey hair and blue eyes, smiling warmly. He is wearing a dark suit jacket over a light blue button-down shirt. He has his arms crossed and is leaning against a wooden pillar on the left. He is wearing a watch on his left wrist and a ring on his left hand. The background is a blurred office setting with large windows.

Meet Robert Rudloff

Senior Vice President of
Internal Audit
MGM Resorts International
Las Vegas, Nevada

by Roy Snell, CHC, CCEP-F

18 Compliance professionals on a board

Please don't hesitate to call me about anything any time.

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It is wise to have someone who has managed a compliance and ethics program on your board. But I have 18 compliance professionals on my board. As you can imagine, it can be a little unnerving for a CEO. Today I wore the same sweater for the second time this week. I feel like a rebel. There may be consequences.



Snell

Sure, SCCE & HCCA occasionally put on a belt and suspenders, but I take great comfort in keeping my distance from total disaster. Our board knows every trick in the book with regard to preventing, finding, and fixing problems. It's probably easier for me than most CEOs, because I actually appreciate the value of getting it right. On our board, I have an expert I can consult in every crevice of risk to make sure I get it right. Does it hinder our business model? Not in the least, and I have proof. We have grown consistently for 21 years. We have built a very large financial reserve. We are now using some of the reserve for our next big endeavor. We have built respect in the compliance world. We have taken big business risks just like every other

kind of business, and in my wholly biased opinion, we have crushed it. The idea that compliance hurts business is BS.

Ironically, the best time to have compliance professionals around is when things go horribly wrong. It's like having a serious car accident in front of a convention of doctors. They are calm, dissect the problem, put it in perspective, and know how to fix it. They base their decisions on facts, proper investigation, and research rather than emotions or feelings. They don't judge how you got into the mess until the mess is fixed and controls are put in place to prevent it from happening again. If some discipline or criticism is necessary, they have at it — but they know what is reasonable.

Society today looks like the days of the Salem witch trials when it comes to regulatory or ethical mistakes. There is no fact gathering, due process, judge, or jury. Random people are dragged into the street by "the mob," and their careers are burnt to the ground. Compliance professionals don't do that. They don't overreact or underreact, because they have seen it all before. Frankly, I really don't understand why all these CEOs, whose careers were ruined by employees who made bad decisions, didn't have someone who had run a compliance program before tied to their hip to give them better advice than the clowns they were listening to before the disaster. Their careers would still be intact. I am very lucky. *