



Building Culture through Communication and Engagement

Keturah Pestel ~ October 23, 2018
SCCE Compliance & Ethics Institute

This Session Uses Polling

To Participate in polling

Download “SCCE Mobile” in your app mobile store. Then under the agenda find this session, scroll to the bottom and click “Poll Question” or go to PollEv.com/cei2018 to answer the active poll.



- ▶ Building Culture through Communication and Engagement



Practical Tips for Success

- ▶ My Background
- ▶ Smart Idea Sourcing
- ▶ Communication that Works
- ▶ Samples of Success (and Lessons Learned)
- ▶ Overcoming Objections and Creating Champions
- ▶ It Starts with One Step



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- ▶ My Background



Leverage what you've got

- ▶ Project Management → Ethics Program Leader
- ▶ Launched Thrivent's Code of Conduct in 2006
- ▶ Worked solo until sabbatical (2013-2015)
- ▶ Thrivent added part-time staffer in 2014
- ▶ Transitioned to alternate staffing model in 2016
- ▶ Created Business Ethics & Legal Support Office in 2017; Lead Ethics portion + full time Sr. Specialist

Year(s)	Total Ethics FTEs
Pre-2006	0
2006-2014	1
2014-2015	1.5
2016-2017	1.3
2017-present	2
2019 →	???



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How many FTEs are dedicated to ethics communication/training at your organization?



Start the presentation to see live content. Still no live content? Install the app or get help at PollEv.com/app

► Smart Idea Sourcing



Philosophy: Don't Create What You Can Edit

- Industry networking groups (forums, newsletters, Daily Digest, conversations, etc.)
- Conferences, seminars and webinars
- Industry Peers
- Awards (e.g. Ethisphere World's Most Ethical Companies application)
- Training (repurpose content; consider off the shelf)
- Books, blogs, podcasts, articles, TED Talks



► Communication that Works



Know Your Audience; Pick Your Channel(s)

- Communications from your group (draft your own or use turnkey content)
 - Daily News (intranet articles, targeted emails, newsletter)
 - Training (yours and that owned by others)
 - Blogs
 - Manager toolkit
 - Lunch and Learns
- Special Events
- Roadshows
- Cultivate champions to carry your message



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How much control do you have over ethics training content and format?

Almost none

Just a little bit

I have input, but someone else
is the decision maker

I am the decision maker but
my organization has limited
options

I am the decision maker and
have a wide range of options

Start the presentation to see live content. Still no live content? Install the app or get help at PollEv.com/app

- ▶ Samples of Success since 2006

Training (at hire and then annually)

- ▶ Varied format
 - ▶ Online training course (most frequently)
 - ▶ In person discussions (every 4-6 years)
 - ▶ Quick hit quiz or short module
 - ▶ Embedded content
 - ▶ Internal development vs. vendor content
- ▶ Interactive, targeted subject matter
- ▶ Utilize evolving best practice training techniques
- ▶ Sometimes internal development, sometimes vendor
- ▶ Periodic manager training (new content every 2-3 years and at hire/promotion)
- ▶ Sometimes we are the solo content owners and sometimes we partner with other business areas



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- ▶ 2018 Training

Meeting in a Box Format

- ▶ Recorded a “Talk Back” session after the 2017 annual ethics event
- ▶ Former HealthSouth CFOs Aaron Beam and Weston Smith talked about their experience and lessons that could be applied at work
- ▶ Table Talk sessions throughout the one hour session provided four discussion opportunities
- ▶ Intention: opportunity to discuss the gray w/ peers; develop internal scripts when issues were hypothetical and safe
- ▶ Feedback: *I came in apprehensive, but this was the best training I’ve had. This training was not a waste of my time.*



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- ▶ Training: What NOT to Do

It's only a
failure
if you don't
learn
something

Learn from my mistakes and successes

- ▶ In person training takes a LOT of time- be sure you're adequately staffed
- ▶ Prerecorded content can help ensure a more consistent message
- ▶ Spend more time thinking through logistics (signup, how credit is granted, completion reports) than you think you need
- ▶ Being first to the table with an idea comes with its own challenges
- ▶ Get input from other groups/cultures to make sure your idea translates well
- ▶ Be crystal clear on your core message and include it in all communications
- ▶ Focus on a higher level message – e.g. people really just need to know resources exist- then make them easy to find when someone goes looking
- ▶ Attention spans are dropping so keep honing your message



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- ▶ Samples of Success since 2006



Internal Communication

- ▶ Intranet websites
 - ▶ FAQs
 - ▶ Resources
 - ▶ Self-service guides
 - ▶ Policy links
 - ▶ Collateral links (Code of Conduct, escalation chart, hotline)
 - ▶ Training information
 - ▶ Archived newsletters, ethics events
- ▶ Articles
 - ▶ Annual communication/reminders (e.g. gifts policy in November)
 - ▶ Ethics Awareness Month, Training Launch, Special Events



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► Thriventcodeofconduct.com External Hotline & Publicly Available Resources

PUTTING THE CODE INTO PRACTICE

Our promise as we serve

We promise to guide Christians on their Wise With Money Journey, equipping them to live more content, confident and generous lives.

Thrivent is dedicated to acting in the interest of our member-owners. Ethics matter, and we expect everyone acting on behalf of Thrivent to know and understand our Code of Conduct and follow its principles. This includes:

- Thrivent workforce—all corporate, subsidiary, affiliate and field employees, financial representatives and interns.
- Thrivent board of directors and officers.
- Contract consultants and agencies that work on Thrivent's behalf.

Making the Right Decisions
Our Code highlights principles that guide our behavior at Thrivent, but it can't address every ethical situation. In those cases, use your best judgment to make the right decision or seek guidance.

Consider these questions before you act:

- Would any action conflict with Thrivent's brand promise or mission?
- Is it legal?
- How would my family or friends view my behavior?
- How might my behavior be perceived if it appeared in social media feeds, on the news or in business headlines?

Why report concerns? It allows us to investigate and stop misconduct. It's normal to be concerned about retaliation, but we prohibit retaliation against anyone who raises a good-faith concern. See our nonretaliation infographic for more details.

What happens in an investigation?
Watch these videos that highlight real Thrivent stories.

Principles-Based Decisions

Situations Aren't Always Obvious

Pulled Into an Investigation

A Discouraging Situation

Things Are Not Always as They Appear

We are successful when our members achieve and sustain:

- Contentment in the present.
- Confidence in the future.
- Communities that thrive.

Where to Go for Help: Speaking Up
You can talk to your manager or any manager or the Thrivent Code of Conduct Office when you have questions.

Immediately escalate any allegations of threat, suspected criminal activity, harassment, discrimination or retaliation to the Code of Conduct Office or appropriate investigation unit. Do not attempt to investigate these topics on your own. Report workplace violence to ext. 5555. Or call 911.

Workforce Responsibilities
In short, your responsibilities under the Code of Conduct include:

- Acting ethically and following Thrivent's policies.
- Asking if you don't know.
- Reporting behavior that isn't consistent with our Code.
- Fully cooperating with internal inquiries and investigations.

Managers are expected to set the right ethical example and tone, and create an open environment where our workforce feels comfortable sharing concerns. Most people prefer to raise concerns to management; managers can always seek guidance from the Code of Conduct Office or HR.

Non-Retaliation and Investigations
We take it seriously when concerns are raised about ethical issues or policy noncompliance. We thoroughly investigate concerns according to our investigation process. We take necessary action based on the investigation results. Under our Code, everyone is held to the same standards. We want to know about issues so we can address them.

Fear of retaliation is often a concern people have when they see something that doesn't seem right. Thrivent prohibits retaliation against anyone who reports a good-faith concern or asks questions about policies or practices. Reports made in good faith should not result in discipline against the reporter, regardless of whether underlying facts prove to be correct or result in any action. If you believe you have faced retaliation, report it for investigation. Those who retaliate are subject to discipline, up to and including termination.

Q: Should I report my concern anonymously?
A: If you want to be anonymous, use our external hotline. But continue to check back using your case number and password. We will always have follow-up questions and information for you. If you don't continue to communicate anonymously, we might not be able to investigate and then we can't address your concern or resolve the problem.

Some links are only accessible through the Thrivent internet.

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► Self Serve Resources

Decision Tree: Giving Gifts & Business Entertainment

Making the right call for business gifts and entertainment can get a little tricky. Use this interactive chart to help you make the right choice. Still confused? Contact the Code of Conduct Office for guidance at Box Code of Conduct or ext. 844-5505.

Is there potential for:

- A conflict of interest?
- Quid pro quo?
- Rebating or inducement?
- Is the gift cash or a cash equivalent (including gift cards or a gift certificate)?
- Would the gift or entertainment be considered lavish?
- Is it something unsavory, sexually oriented, illegal, or that otherwise counters *The Thrivent Way*?

- ☐ Yes
☐ No

[Back](#)

Resources

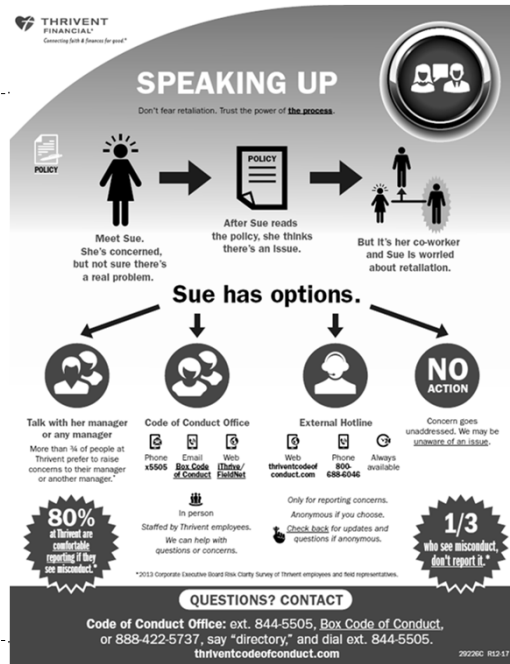
- [Gifts and Business Entertainment Policy Guidelines](#)
- [Gifts and Business Entertainment Infographic](#)
- [Gift Log](#)
- [State Specific Guidelines](#)
- [Compliance Manual/WSPs for Registered Reps](#)

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Infographics publicly available
at Thriventcodeofconduct.com

Key Policies

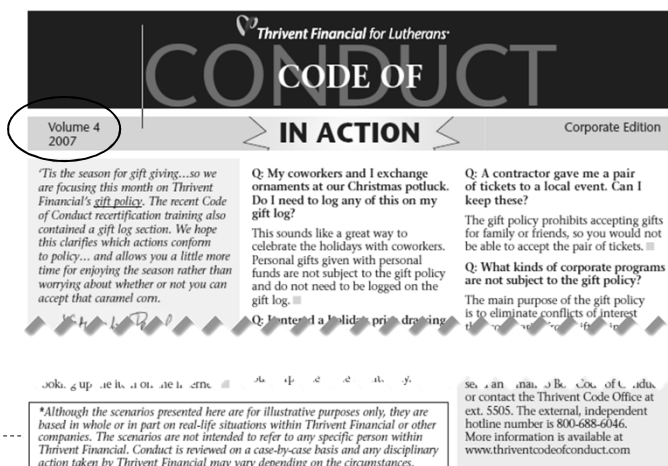
- Frequently asked about
- People should know (but don't)
- Things they might worry about



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► Newsletters and Blogs

- Initially started with lengthy disclosure
- Over time, got buy-in to just share stories



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► Newsletters and Blogs

- Real stories build confidence in your processes
- Share good as well as bad
- Anonymized information is fine



The case of the spilled wine

At an out-of-town business dinner a few years ago, a junior-level member of a vendor team accidentally knocked over a bottle of red wine. It landed squarely on a Thrivent leader, ruining her clothing.

The business partner apologized profusely and offered to pay for dry cleaning expenses. The Thrivent leader politely refused.

The next morning, she found two \$100 Visa gift cards under her door from the business partner. She knew it was against corporate policy to accept gift cards, and sought out the business partner to return them. He refused to take them back.

Upon returning home, the leader contacted the Code of Conduct Office to determine an appropriate solution. After listening to her story, Keturah suggested that she keep one card to cover the cost of the ruined garment and donate the other to a nonprofit of her choice. "The employee used sound business judgment in getting us involved up front to find an acceptable resolution in line with our principles-based policy," Keturah said.



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► Samples of Success since 2006

Roadshows

- At program launch and periodically since
- With executives (annually- initially discussed Ethics Perception Survey results; now discuss that and/or culture trends, flags, concerns, investigations)
- With divisions or departments
- Following launch of something new
- After an investigation
- Newly acquired business entities
- Boards of Directors of parent company and subsidiaries



What can you use to create a natural connection point?



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▶ Sample Roadshow Slide

CODE OF CONDUCT OVERVIEW

We promote trust throughout the organization by creating a comfortable place for people seeking legal support, guidance on business ethics or who wish to report a concern.

- Doing what's right (common sense)



- Following the law



- Asking if you don't know



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▶ Samples of Success since 2006



Ethics Perception Surveys

- ▶ Utilized Corporate Executive Board (now CEB Global/Gartner) and Ethisphere
 - ▶ First survey in 2008; repeated annually then stretched to biannually over time
- ▶ Provided objective feedback about our own ethical perceptions and differences among divisions/sales groups
- ▶ Open ended comments helped convince leaders we needed to share more real stories (to help build confidence that our processes worked as we said)
- ▶ Primary focus: Organizational Justice and Comfort Speaking Up

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► Samples of Success since 2006



Ethics Awareness Events

- March (Financial Services); September (SCCE)
- Initially just a poster and article
- 2012: started annual Ethics Awareness Event
 - Recorded for later playback
 - Ethics speakers (experts and convicted felons who have served their time)
 - Leader panel
 - Decade Retrospective
 - Opening the Black Box (Investigations Process)
 - Case Studies (real cases from our company and the news)
 - Ethics in the Age of Transparency (shared our ethics survey results and real stories)

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► Ethics Event Posters

Opening the Black Box: What really happens during an investigation?

Don't miss our Ethics Awareness Month event!

Thrivent Financial takes reports of misconduct seriously. We open investigations as needed and strive to find the facts so we can take the appropriate action. Come to hear:

- Welcome and overview by President and CEO Brad Hewitt.
- Real stories from Thrivent employees who have raised concerns, been interviewed, or had to manage the outcome of an investigation.
- A panel of in-house investigators addressing real questions about investigations.

Submit panel questions in advance to Box Code of Conduct.

Wednesday, March 7
2–3 p.m.

Minneapolis Auditorium
Appleton A103–A106
Videoconference and livestreamed.

Questions? Email Box Code of Conduct or call ext. 5505.

Presentation also will be videotaped for later viewing.



Case Studies: Real Examples, Real Lessons



The 2013 Ethics Awareness Event is Monday, April 1.

We'll use both Thrivent examples and external examples as the basis for our ethics discussion. Come learn how delays in raising concerns can lead to significant downstream impact and how early alerts can result in better outcomes for everyone—the concerned individual, work group, alleged offender and Thrivent.

Monday, April 1
10 to 11 a.m.
Minneapolis Auditorium
Appleton A103-106

The video conference will be live streamed and recorded for later viewing.
Questions? Email Box Code of Conduct or call ext. 5505.



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► Ethics Event Posters



This interactive case study discussion explores why good people and organizations can act unethically. The case studies provide a foundation for an analysis regarding how the fostering of ethical diversity within organizations can prevent the slippery slopes that lead to administrative evil or unethical behavior.



Guest speaker: David Schultz
 • Professor, Hamline University,
 Department of Political Science
 • Editor, Journal of Public
 Affairs Education
 • Two-time Fulbright Scholar
 Program Winner

Join us for the March
 Ethics Awareness Month event

COOKING THE BOOKS

The rise and fall
 of HealthSouth Corp.



Hear the story of HealthSouth, one of America's largest and most successful healthcare services providers. Aaron Beam and Weston Smith, former CFOs and convicted felons, share how they became part of a \$2.8 billion accounting fraud (one of the largest in American history) and the lessons they learned.



Aaron Beam Weston Smith

Sign up via the Planner.

BREAKAWAY SESSION:
 Discuss ethical scenarios
 and 'what if' situations.
 1 to 2 p.m.

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Overcoming Objections

How do I get buy-in?

Generally

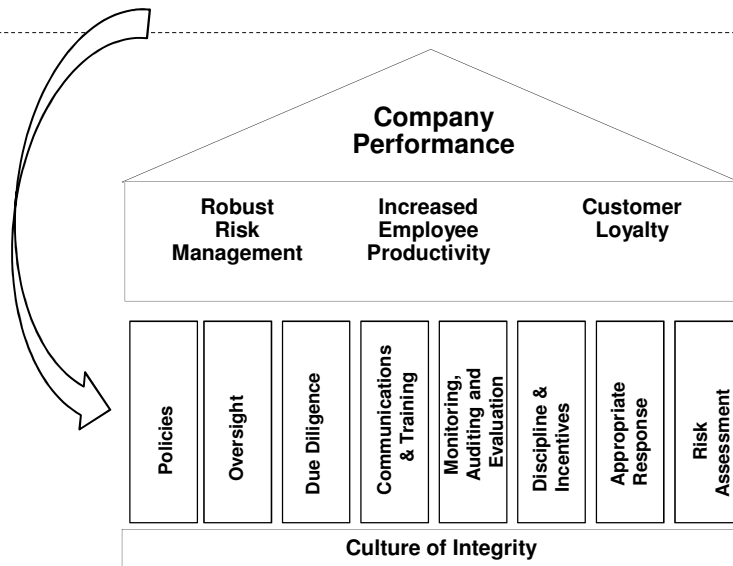
- Appeal to best practices, legal requirements & outside sources
- What are others doing, how is it helping (and how didn't it hurt)
- Board or Executive mandates help
- Demonstrate value add (and risk avoidance)
- Team: start with what you can control
 - Ensure your team is engaged. If it's just you, or you and a manager, it's critical that your manager supports you.
 - **Start with just one thing.** Build success one piece at a time.

You can't make progress until you start.



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Federal Sentencing Guidelines



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How many champions do you have?

I'm struggling to think of anyone who falls in that category.

I have 1-3 champions.

I have a solid handful.

More than I can reel off during the time this poll is open.

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Winning Management Support

Counter objections with data

- Increased engagement
- Higher ethics survey scores (focus especially on organizational justice and comfort speaking up)
- Problems that have come from ethics failures
- Best practices examples
- Where it hasn't gone wrong
- Start with something smaller and less controversial or at a level they will support even if it's not everything you want.



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Winning Business Partner Support

- Can you help solve their problems?
 - Ideally, get a champion to help you
 - Barring that, create a champion. What are their concerns? How can you address them?
 - What would they support? Can you do it together?
 - Would it be better to draft something and run past them for support/review? Or would it be easier to try something you control and show them it worked?
- I:ls, group meetings (Harmonization Team)



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- ▶ It Starts with One Step



There's never enough (*time – people – resources*)

- ▶ Start with one thing
- ▶ Modify something you already do
 - ▶ E.g. training - can you have a mini-module?
- ▶ Can you write one article or one email (adapt to your corporate culture/norms)?
- ▶ Can you adapt/reuse/share one item with managers? E.g. ECI case study #RespectAtWork see *ethics.org*
- ▶ Ask your champions to help



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Questions?



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Contact Information



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