



Promoting A Fearless Speak-Up Culture in the Age of #MeToo

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SESSION AGENDA

–It’s all about leadership

–Do we really know if we have a fearless Speak-Up Culture in our organization?

–What can we do to get there?

–What can we do to stay there?

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Why Promote A Fearless Speak-Up Culture?

- All organizations experience fraud and misconduct.
- Increased responsibility on Management to prevent, detect and correct unacceptable behaviors.
- Legal requirements to disclose fraud and certain misconduct.
- Risk mitigation.
- Key element of a sound E&C Culture.
- Makes good sense.

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<p align="center">Does your E&C Program Risk Assessment Address a Fearless Speak-Up Culture?</p> <p>Risks associated with a weak E&C Culture</p> <p>E&C Program/Culture Risks:</p> <ul style="list-style-type: none"> - Integrity risk - Compliance risk (ability to comply with mandatory disclosure laws and regulations) <ul style="list-style-type: none"> • Federal Sentencing Guidelines • Mandatory Disclosure Rules • Other Customer and Government Agency Requirements <p>Company Risks:</p> <ul style="list-style-type: none"> - Potential Civil & Criminal Liability risk (FSGs) - Reputational damage risk <p>CECO Risks:</p> <ul style="list-style-type: none"> - Credibility & Integrity risks
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<p align="center">Speak Up Culture Codified</p> <ol style="list-style-type: none"> 1. Does your company have a Policy/Procedure that addresses a Fearless Speak-up Culture? 2. What is your worst case scenario – “what could go terribly wrong”? <ul style="list-style-type: none"> - Wells Fargo, Harvey Weinstein, Matt Lauer, Roger Ailes et al 3. Identify your Legal and Compliance risks. 4. What are you doing now or what will you do to mitigate those risks? 5. Estimate the cost of a worst case scenario. <ul style="list-style-type: none"> - Consider costs to investigate, report, implement corrective actions and cost of potential litigation settlements, fines, penalties, and business losses. <p>How Does your E&C Program address the efficacy of a Fearless Speak-Up Culture?</p>

<p align="center">Fundamental Propositions</p> <ul style="list-style-type: none"> ➤ Fair treatment of all employees ➤ Earn and maintain trust ➤ Guard against employee retaliation ➤ Respect confidentiality ➤ Consistent, uniform, thorough process ➤ Independent and objective investigations ➤ Do no harm 	
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Let's Discuss

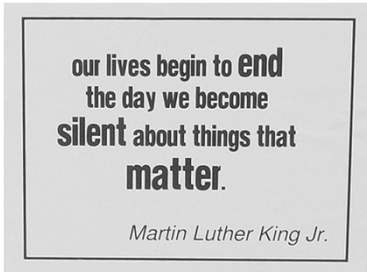
Silence is Golden – NOT!



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Let's Discuss

What is a “Fearless Speak-Up Culture”?



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Let's Discuss

Does you believe your organization has a fearless Speak-Up Culture?



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Let's Discuss

If so, can you prove it and how?



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Let's Discuss

Please share any initiatives you have taken or are taking to communicate your organization's commitment to a fearless Speak-Up Culture.

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Let's Discuss

Is Management, at all levels, engaged in the organization's culture?



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Let's Discuss

Specifically, what are you doing to engage your Management & Leaders?



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Let's Discuss

What expectations are you setting for the employees in your organization?



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Let's Discuss

What metrics are you utilizing to demonstrate the efficacy of your organization's speak up culture?



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Observations, Comments or Questions?

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