



## Building Culture through Communication and Engagement

Keturah Pestel ~ March 2, 2018 ~ SCCE Regional Conference

1

### Agenda

#### Practical Tips for Success

- ▶ My Background
- ▶ Smart Idea Sourcing
- ▶ Communication that Works
- ▶ Building Champions
- ▶ It Starts with One Step



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2

► My Background



**How to 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



3

► 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 WME application)
- Training (repurpose content; consider off the shelf)
- Books, blogs, podcasts, articles, TED Talks



4

- ▶ Communication that Works



## **Know Your Audience; Pick 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



5

- ▶ Samples of Success since 2006



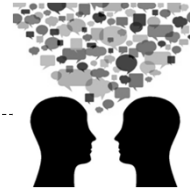
## **Training (at launch and then annually)**

- ▶ Varied format
  - ▶ CBTs (most frequently)
  - ▶ In person discussions (every 4-6 years)
  - ▶ Internal development vs. vendor content
- ▶ Interactive, targeted subject matter
- ▶ Utilize evolving best practice training techniques
- ▶ sometimes internal development, sometimes vendor
- ▶ Periodic manager training
- ▶ Sometimes solo content owners and sometimes partner with other business areas



6

► 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 1 hour session provided discussion opportunities
- Intention: opportunity to discuss the gray w/ peers
- Feedback: *I came in apprehensive, but this was the best training I've had. This training was not a waste of my time.*



7

► 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



8

## ► Thriventcodeofconduct.com External Hotline & Publically Available Resources

PUTTING THE CODE INTO PRACTICE

### THE THRIVENT WAY

Our mission, vision and values.

We are a membership organization of Christians, and our members are our owners. Our purpose is to serve our members and society by guiding both to be wise with money and live generously. We believe that all we have is a gift from God and that generosity is an expression of faith. We succeed when our members, their families and their communities thrive. We value our relationships, so we will be trustworthy in character and competence, and act for others and treat each other as servants, with love, respect and generosity.

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

- All employees, including corporate employees, field management, subsidiary employees and interns.
- Financial representatives and producers, including their agents and employees.
- Key consultants and key contractors acting on behalf of Thrivent.
- Directors and officers serving on our boards.

**Making the Right Decisions**  
Our Code highlights key 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:

- Does my action conflict with [The Thrivent Way](#)?
- Is it legal?
- How would my family or friends view my behavior?
- How would my action look as a headline in tomorrow's newspaper?
- Could my behavior harm Thrivent's reputation?

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

**Thrivent Awaits**  
Thrivent Awaits an investigation

**Thrivent Awaits**  
Thrivent Awaits a disciplinary situation

**Thrivent Awaits**  
Thrivent Awaits an appeal

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 non-retaliation infographic for more details.

Thriventcodeofconduct.com

### CONDUCT

Thrivent is a membership organization of Christians. Our members are joined in a movement of being wise with money, living generously and changing lives.

**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. Please report any ethical issues or concerns about noncompliance to one of our available resources.

**Your responsibilities under the Code of Conduct include:**

- Act ethically and follow Thrivent's policies.
- Ask if you don't know.
- Report behavior that isn't consistent with our Code.
- Fully cooperate with any internal inquiries and investigations.

**Manager Responsibilities**  
Managers have an additional responsibility to set the right ethical example and tone and monitor certain concerns. Managers must: **disallow** any allegations of harassment, discrimination, retaliation, workplace violence, fraud or illegal activity to the appropriate **investigation** unit. We know that most people at Thrivent prefer to raise concerns to management and we encourage managers to create an open environment. Managers are always able to 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 incidents 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 when people 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 not 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 facts are only resolvable through the Thrivent process.

9

## ► 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](#)

10



**THRIVENT**  
**FINANCIAL®**  
*Connecting faith & finances for good*



**THRIVENT**  
 FINANCIAL  
*Connecting Faith & Dollars for good.™*





# SPEAKING UP


Don't fear retaliation. Trust the power of **the process.**



**POLICY**






**POLICY**






Meet Sue.  
She's concerned,  
but not sure there's  
a real problem.

After Sue reads  
the policy, she thinks  
there's an issue.


But it's her co-worker  
and Sue is worried  
about retaliation.

## Sue has options.




Talk with her manager  
or any manager

More than 1/4 of people at  
Thrivent prefer to raise  
concerns to their manager  
or another manager.\*




Code of Conduct Office



Phone 855-505-  
N Email [Box.Code@thrivent.com](mailto:Box.Code@thrivent.com)  
Web [Thrivent.com/Employee](http://Thrivent.com/Employee)

 In person


Staffed by Thrivent employees.  
We can help with  
questions or concerns.



External Hotline

 Web [thriventcodeofconduct.com](http://thriventcodeofconduct.com)  
 Phone 800-688-6046

Always available



**NO ACTION**

Concern goes  
unaddressed. We may be  
witnesses of an issue.

**80%** are  
comfortable  
reporting if they  
are accountable.

Only for reporting concerns.  
Anonymous if you choose.  
Check back for updates and  
questions if anonymous.

**1/3**  
who see misconduct,  
don't report it.\*


\*2013 Corporate Leadership Index Clarity Survey of Thrivent employees and their representatives.

### QUESTIONS? CONTACT

Code of Conduct Office: ext. 844-5505, [Box Code of Conduct](mailto:Box.Code@thrivent.com),  
or 888-422-5737, say "directory," and dial ext. 844-5505.  
[thriventcodeofconduct.com](http://thriventcodeofconduct.com)

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



# CODE OF

## IN ACTION

Volume 4  
2007

Corporate Edition

*"This season for gift giving... so we are focusing this month on Thrivent Financial's gift policy. The recent Code of Conduct recertification training also contained a gift log section. We hope this clarifies which actions conform to policy... and allows you a little more time for enjoying the season rather than worrying about whether or not you can accept that caramel corn."*

**Q: My coworkers and I exchange ornaments at our Christmas potluck. Do I need to log any of this on my gift log?**

This sounds like a great way to celebrate the holidays with coworkers. Personal gifts given with personal funds are not subject to the gift policy and do not need to be logged on the gift log. ❏

**Q: I entered a holiday prize drawing**

*"So, a guy at the local event gave me a pair of tickets to a local event. Can I keep these?"*

The gift policy prohibits accepting gifts for family or friends, so you would not be able to accept the pair of tickets. ❏

**Q: What kinds of corporate programs are not subject to the gift policy?**

The main purpose of the gift policy is to eliminate conflicts of interest that could arise from the exchange

*"So, an annual office Christmas dinner, or contact the Thrivent Code Office at ext. 5505. The external, independent hotline number is 800-688-6346. More information is available at [www.thriventcodeofconduct.com](http://www.thriventcodeofconduct.com)*

*\*Although the scenarios presented here are for illustrative purposes only, they are based in whole or in part on real-life situations within Thrivent Financial or other companies. The scenarios are not intended to refer to any specific person within Thrivent Financial. Conduct is reviewed on a case-by-case basis and any disciplinary*

## ► Newsletters and Blogs

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- 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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13

## ► Samples of Success since 2006

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### 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
- 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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14

► 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



15

► 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

16



► 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)

17

## ► 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.



18


## ► Ethics Event Posters



**“WHY GOOD PEOPLE AND ORGANIZATIONS DO BAD THINGS”**

2015 March Ethics Awareness Event

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.**

19

## Overcoming Objections

### How do I get buy-in?

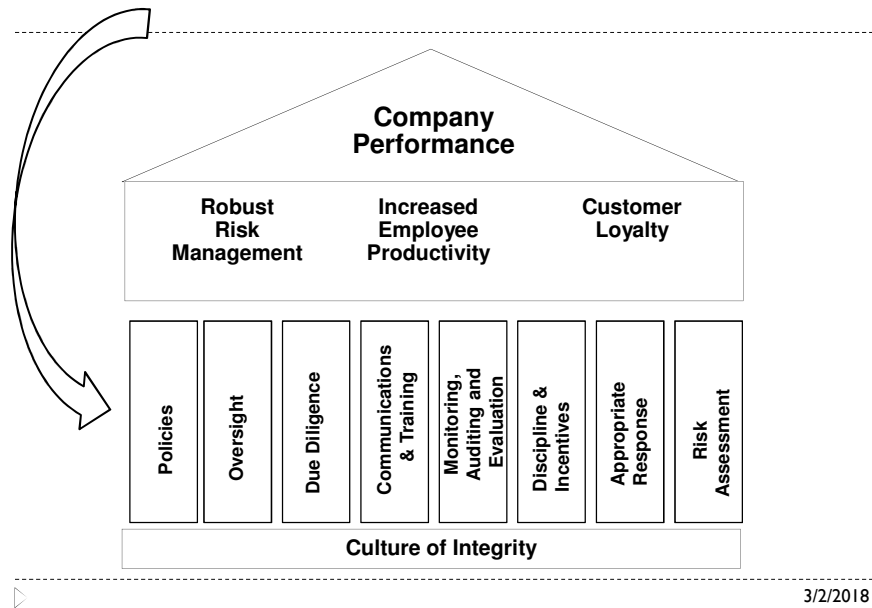
#### Generally

- 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.



20

## Federal Sentencing Guidelines



## ► Creating Champions



## 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.

- ▶ Creating Champions



## 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)



23

- ▶ Where do I Start?



## 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](http://ethics.org)
- ▶ Ask your champions to help



24

## Questions?

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2015 Annual Conference • 25

## Contact Information

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