



# MAKING YOUR PROGRAM RESILIENT: DEFINING A STRATEGIC MISSION AND VISION FOR SUCCESS

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# WHY

THE IMPORTANCE OF MVVC

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## VISION

*What the world or your organization looks like in the **future**.*



## MISSION

*What you are doing **now** to achieve your vision.*



## VALUES

*What you believe in and how you behave.*



## CHARTER

*The specific roles, responsibilities, structure, and objectives of the E&C program.*

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**A 10% improvement in employees' connection with the mission of their organization would result in:**

- 12.7% reduction in safety incidents
- 8.1% decrease in turnover
- 4.4% increase in profitability

Source: Gallup's 2016 State of the American Workplace report

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## Vision, mission, and values in practice

### Internally

- Guide thinking on strategic issues
- Inspire employees and provide shared purpose
- Guide employee decision making
- Help establish shared expectations for behavior
- Inform performance standards

### Externally

- Connect with customers, suppliers, partners
- Serve as a recruitment tool
- Market differentiator
- Public relations

## Charters in practice

### Internally

- Provide visibility into program structure and objectives
- Aid management of E&C programs
- Help ensure appropriate resources are provided

### Externally

- Help answer the three “fundamental questions” of regulators like DOJ

**LRN** Inspiring Principled Performance

Selected references:

<https://www.bain.com/insights/management-tools-mission-and-vision-statements/>

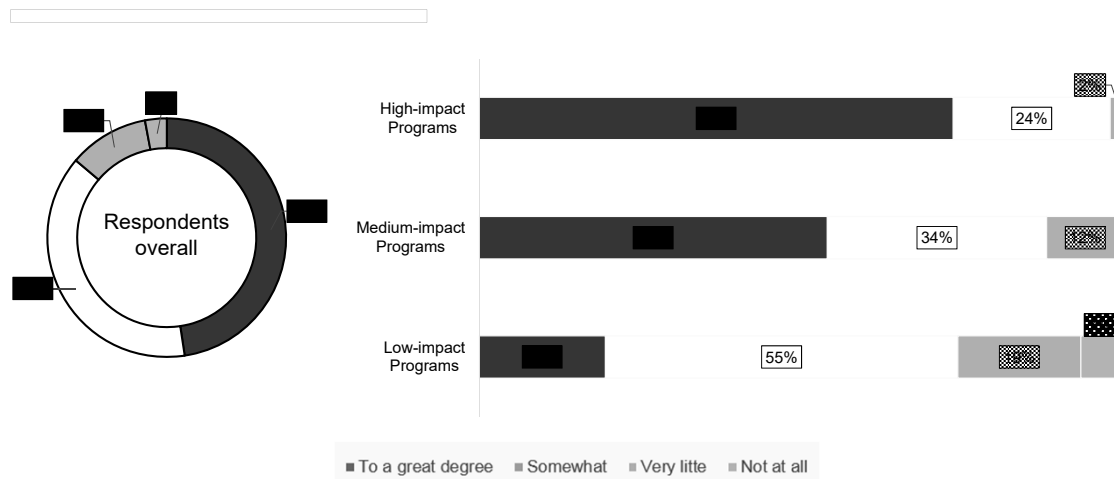
Building a World-Class Compliance Program: Best Practices and Strategies for Success by Martin T. Biegelman and Daniel R. Biegelman

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## Embracing a values-based approach to E&C

Over the past five years, my organization's E&C program and efforts have increasingly focused on values, not just rules.



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Source: LRN's 2019 E&C Program Effectiveness Report

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## A focus on values yields real impact

Organizations whose programs increasingly focus on values enjoy a multiplier effect in their impact on a variety of critical indicators, relative to programs with little to no focus on values.


**4x**

Employees use of organizational values in decision-making


**3x**

Employee engagement


**2.5x**

Levels of speaking up/out


**2x**

Employees do the right thing, even if not in their best interest


**2x**

Employees recognizing and reporting misconduct

# HOW

DEVELOPING A SUSTAINING MISSION



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### **Our Commitment**

ChemicalCo is committed to conducting our business everywhere, every time, consistent with our values of honesty, integrity, respect and responsibility.

### **Ethics and Compliance Program Purpose and Scope**

The purpose of the Program is to

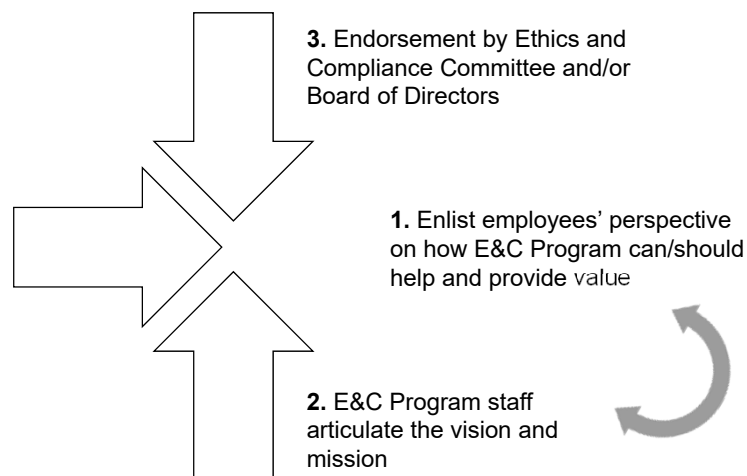
1. Promote and foster an organizational culture of integrity, ethical decision-making and compliance;
2. Assure that the company's directors, officers, and employees conduct business with the highest standards of ethics and integrity and in compliance with all applicable laws and regulations;
3. Conduct appropriate risk assessment and due diligence to prevent and detect unlawful and unethical conduct; and
4. Investigate and remediate misconduct



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## **Process: Bottom-up, side-to-side, and top-down**



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Our vision is to make **JLL** a world-leading, sustainable professional services firm by creating spaces, buildings, and cities where everyone can thrive.

**FROM YOUR ETHICS OFFICERS**

Our goal is to make our Ethics Everywhere program an enabler for a great company.

*Our Code of Ethics*

**Ethics everywhere**

JLL stands for uncompromising integrity and the highest ethical conduct.




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**THE CLOROX COMPANY**

We make everyday life better, every day



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## ETHICS AND COMPLIANCE



### Ethics and Compliance Program Charter

as of October 14, 2016

#### A. Overview

The Johnson Controls Ethics and Compliance Program (the "Program") consists of enterprise-wide and business unit-specific policies, standards, procedures, guidelines and responsibilities designed to:

- a. Promote and foster an organizational culture of integrity, ethical decision-making and compliance with the Company's values as reflected in the *Ethics Policy*;
- b. Assure that the Company's Directors, Officers, and employees conduct business with the highest standards of ethics and integrity and in compliance with all applicable laws and regulations; and
- c. Promote appropriate risk assessment and due diligence to prevent and detect unlawful and unethical conduct.

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### Vision

- What is your preferred future?
- What problem are you trying to solve?
- How can you make life better for others?

### Mission

- How does it reinforce the broader mission?
- Is it meaningful?
- Start with an infinitive
  - We exist to... Our mission is to...
- Who are you trying to reach?
- What is your desired outcome?
- How will you measure it?

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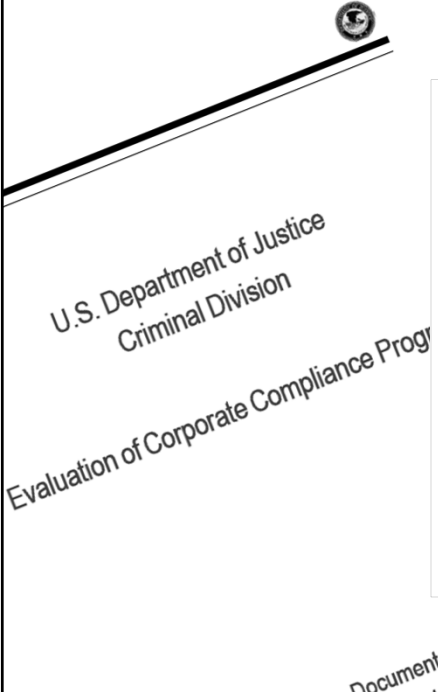
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# WHAT

YOUR MISSION AS A NORTH STAR

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U.S. Department of Justice  
Criminal Division  
Evaluation of Corporate Compliance Program

- 1. Is the Corporation's Compliance Program Well Designed?**
  - Risk Assessment
  - Policies and Procedures
  - Training and Communication
  - Confidential Reporting Structure and Investigation Process
  - Third Party Management
  - Mergers and Acquisitions (M&A)
- 2. Is the Corporation's Compliance Program Being Implemented Effectively?**
  - Commitment by Senior and Middle Management
  - Autonomy and Resources
  - Incentives and Disciplinary Measures
- 3. Does the Corporation's Compliance Program Work in Practice?**
  - Continuous Improvement, Periodic Testing, and Review
  - Investigation of Misconduct
  - Analysis and Remediation of Any Underlying Misconduct

Document

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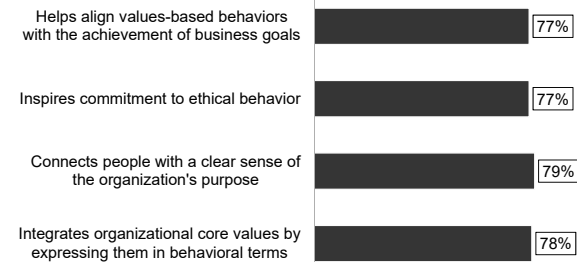
## Ensure your Code promotes values-based behavior

### 2019 DOJ EVALUATION GUIDANCE

- As a threshold matter, prosecutors should examine whether the company has a code of conduct that sets forth, among other things, the **company's commitment to full compliance** with relevant Federal laws that is **accessible and applicable** to all company employees.
- Prosecutors should assess whether the company has established policies and procedures that **incorporate the culture of compliance** into its day-to-day operations.

### 2019 E&C PROGRAM EFFECTIVENESS REPORT

#### DOES YOUR CODE MEET THE FOLLOWING GOALS?



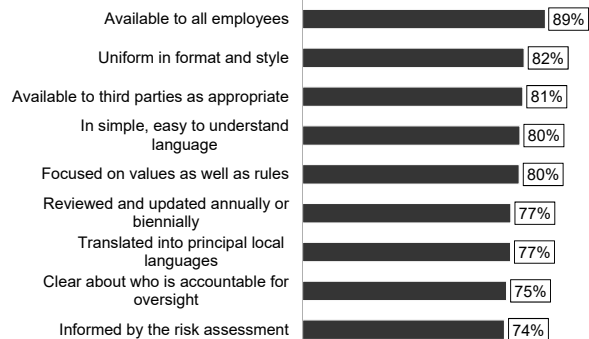
## Operationalize compliance by making policies accessible

### 2019 DOJ EVALUATION GUIDANCE

- Prosecutors should assess whether the company has established policies and procedures that **incorporate the culture of compliance** into its day-to-day operations.
- Accessibility** – How has the company communicated its policies and procedures to all employees and relevant third parties? If the company has foreign subsidiaries, are there **linguistic or other barriers** to foreign employees' access?
- Additional guidance relating to Design, Comprehensiveness, Operational Integration, and Gatekeepers*

### 2019 E&C PROGRAM EFFECTIVENESS REPORT

#### ARE YOUR ORGANIZATION'S POLICIES:



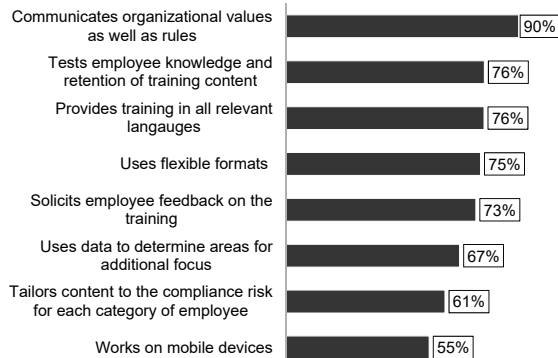
## Support employees through training and education

### 2019 DOJ EVALUATION GUIDANCE

- Another hallmark of a well-designed compliance program is **appropriately tailored training** and communications.
- What training have employees in relevant **control functions** received? Has the company provided tailored training for high-risk and control employees?
- Has the training addressed **lessons learned** from prior compliance incidents?
- How has the company **measured the effectiveness** of the training?

### 2019 E&C PROGRAM EFFECTIVENESS REPORT

#### MY ORGANIZATION'S ETHICS & COMPLIANCE TRAINING PROGRAM:



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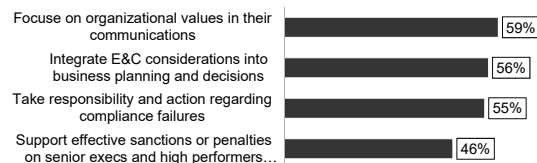
## Cultivate support from key stakeholders

### 2019 DOJ EVALUATION GUIDANCE

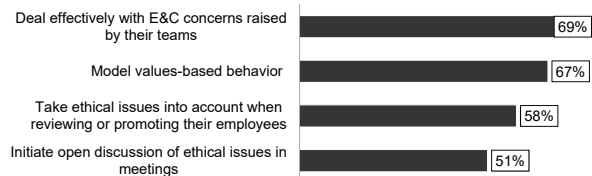
- The effectiveness of a compliance program requires a **high-level commitment by company leadership** to implement a culture of compliance from the top.
- The company's **top leaders** – the board of directors and executives – **set the tone** for the rest of the company.
- Prosecutors should examine the extent to which **senior management have clearly articulated the company's ethical standards**, conveyed and disseminated them in clear and unambiguous terms, and demonstrated rigorous adherence by example.
- Prosecutors should also examine how **middle management**, in turn, have **reinforced those standards** and encouraged employees to abide by them.

### 2019 E&C PROGRAM EFFECTIVENESS REPORT

#### SENIOR MANAGERS AT MY ORGANIZATION:



#### MIDDLE MANAGERS AT MY ORGANIZATION:



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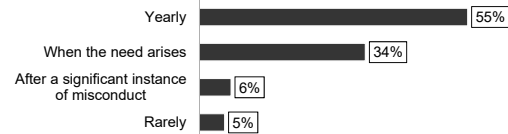
## Use measurement to reinforce what you're managing

### 2019 DOJ EVALUATION GUIDANCE

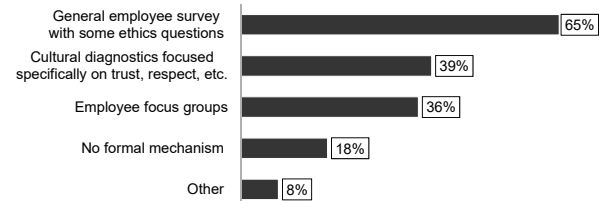
- Is the corporation's compliance program **well designed** (and) being **implemented effectively**?
- How often and how does the company **measure its culture of compliance**?
- Does the company seek **input from all levels of employees** to determine whether they perceive senior and middle management's commitment to compliance?
- What **steps has the company taken in response** to its measurement of the compliance culture?

### 2019 E&C PROGRAM EFFECTIVENESS REPORT

#### HOW OFTEN DOES YOUR ORGANIZATION REVIEW ITS E&C PROCEDURES TO ENSURE THEY REFLECT AND ADDRESS KEY RISKS?



#### WHICH OF THE FOLLOWING METHODS DOES YOUR ORGANIZATION USE TO ASSESS ITS ETHICAL CULTURE?



# THANK YOU