

# Building a Global Compliance Training Program

## 2018

### Innovation and Strategy



**Britta Luescher**



**Peggy Dolin**



**Nichole Pitts**



**Moderator**



**Matt Plass**




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**Britta Luescher**



#### Director Compliance

Britta Luescher is Director for Compliance training at Novartis International, where she established new and efficient ways for compliance training and internal communication.



**Peggy Dolin**



#### Policies, Education & Training Director in Global Ethics & Business Integrity

Peggy Dolin-Brunel received a Master degree in Biology from Paris University. She has 20 years of professional experience with Sanofi. She started in clinical research as clinical research associate and lead writer in charge of clinical parts of several US and European registration dossiers.



**Nichole Pitts**



#### Vice President, Compliance and Ethics Officer

Nichole Pitts is the Vice President, Compliance and Ethics Officer providing support to Louis Berger International operations. She oversees Louis Berger's global anti-corruption policy and due diligence program, identifies and assesses compliance risk, conducts training on various compliance topics, mentors employees and conducts investigations.

**Moderator**



**Matt Plass**



#### Chief Executive Officer, US.

Matt has an extensive background in e-learning, blended learning, classroom education and learning design for adult audiences and has engaged with numerous global Fortune 500 organizations in the design and development of strategic learning initiatives.

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# Agenda FOR TODAY

1. CHALLENGES FOR 2018
2. GOVERNANCE & STRATEGY
3. BUILDING THE COMPLIANCE BRAND
4. REACHING YOUR PEOPLE
5. MEASURING EFFECTIVENESS
6. DRIVING CULTURE

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## CHALLENGES FOR 2018

What is the greatest training challenge you face in 2018?

Being asked  
to do more  
for less

A

Consolidatin  
g and  
improving  
our program

B

Adapting to  
changing  
regulatory  
environment

C

Something  
else...

D

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## GOVERNANCE & STRATEGY

How would you describe your compliance training strategy?

Consistent,  
articulated,  
measurable

A

Confused and  
inconsistent

B

We don't  
have one.

C

Something  
else...

D

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## TRAINING STRATEGIES & GUIDELINES



Internal  
Associates



External  
Contractors



Third Parties and  
External Service  
Providers

 NOVARTIS

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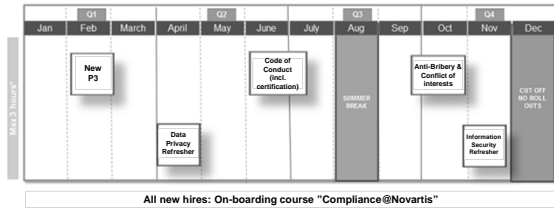
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## DO YOU TALK WITH YOUR PARTNERS?



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## Louis Berger COMPLIANCE VISION

For all employees to understand, commit to, and own efforts to ensure ethical and compliant behavior in day-to-day business activities to support long-term value creation for Louis Berger.

All employees will:

Understand the requirements and risks that pertain to their specific role and demonstrate the initiative to seek out help, when necessary, to appropriately manage the risks

Speak Up when they see something that could create a risk for the company.

Ensure that compliance training and the transfer of knowledge are effective to manage risks and support business objectives

Demonstrate commitment to the compliance vision and proactively challenge the compliance risk priorities and mitigation efforts.




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## BUILDING THE COMPLIANCE BRAND

How is compliance training perceived in your organization?

A necessary evil	A useful reminder of the rules	A great way to boost our compliance culture	Something else...
A	B	C	D

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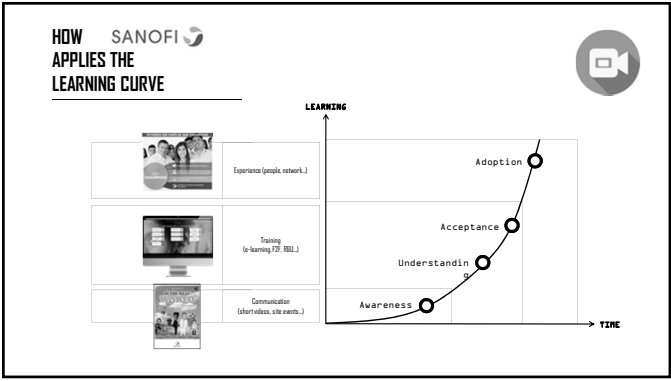
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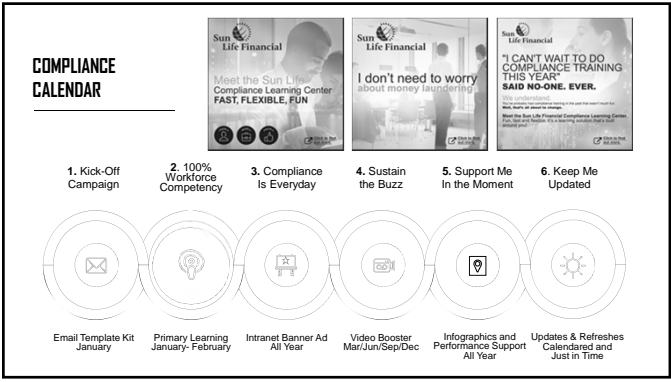
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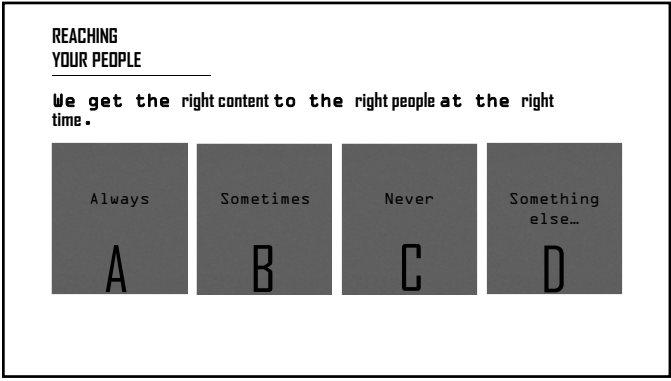
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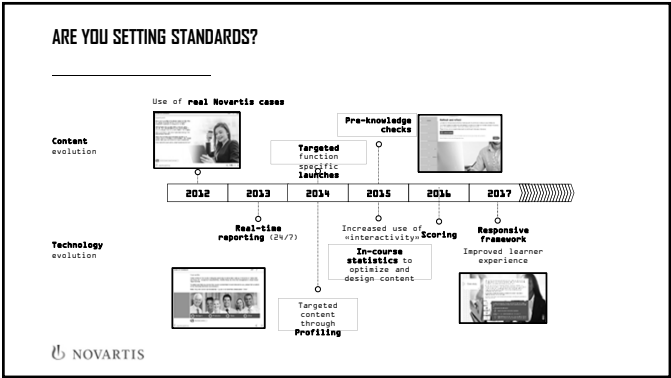
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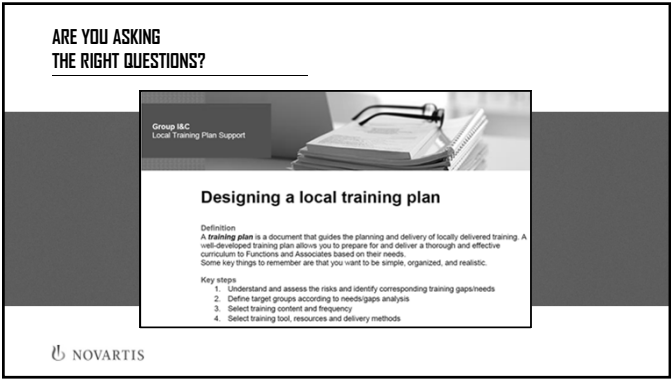
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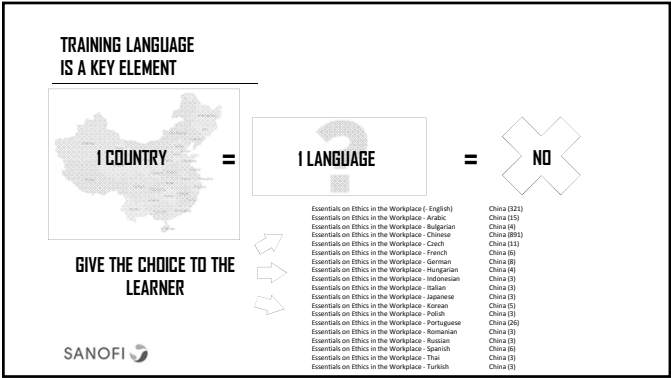
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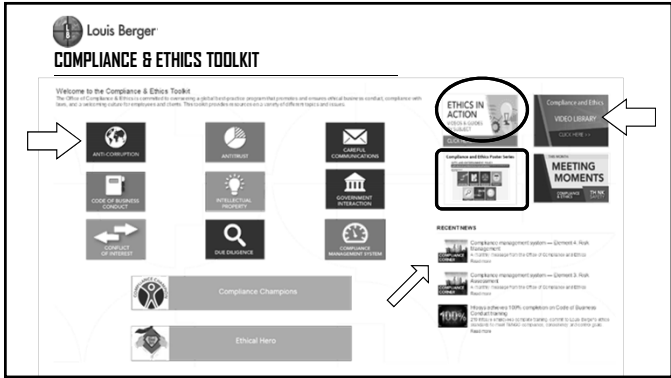
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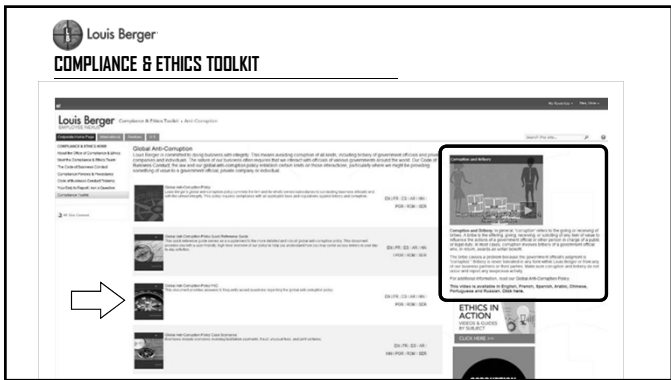
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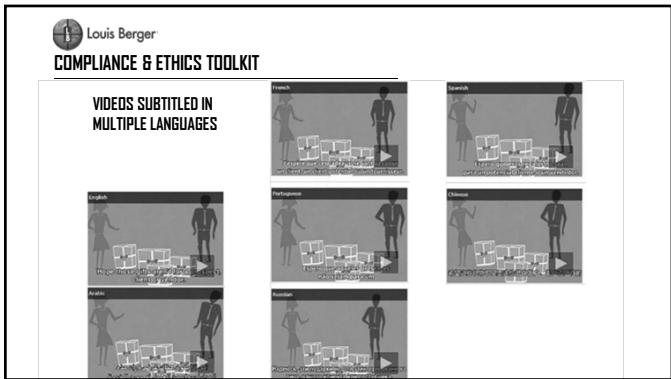
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## MEASURING EFFECTIVENESS

You know your compliance training program is effective because...

We measure carefully and gather hard data

A

We have anecdotal evidence but no hard data

B

Actually, we *don't* know if our program is effective

C

Something else...

D

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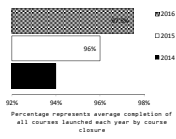
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## ARE YOU SUCCESSFUL?

Cumulative completion uptake growth year after year



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### Code of Conduct understanding

Global top norm	Company wide result
88%	92-95%*

\* Results based on multiple survey tools launched from 2013 to 2017 and represent the top 5 results on a scale of 1-5 for the question: The Code of Conduct has been explained to me so that I understand it.

### Constant course content engagement

Measured criteria	2014	2015	2016	2017
The course is helpful to me doing my job	86%	88%	88%	87%
The content is interactive and engaging	91%	94%	94%	95%

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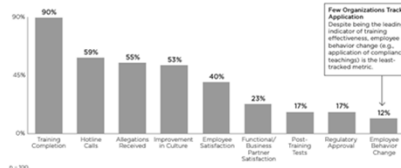
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## WHAT GETS MEASURED?

### CURRENT APPROACH TO MEASURING EFFECTIVENESS

Most Frequently Tracked Metrics

Which of the following metrics do you use to demonstrate the effectiveness of your compliance and/or ethics training program?



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Source CEB 2013

**Few Organizations Track Application**  
Despite being the leading indicator of training effectiveness, employee behavior change (e.g., application of compliance teachings to the next tracked metric)

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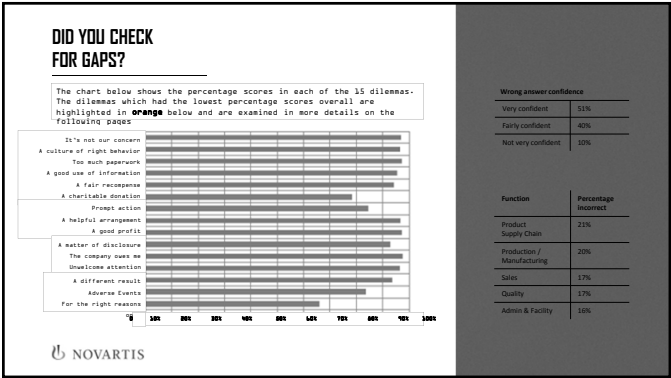
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### MARKETS LIKE NUMBERS...

Country	0-20%	21-40%	41-60%	61-80%	81-100%
China	0.17%	1.39%	6.33%	40.69%	51.53%
Germany	0.03%	0.39%	4.86%	44.64%	50.18%
Japan	0.06%	0.86%	15.78%	50.88%	32.21%
India	0.34%	2.81%	14.04%	51.33%	31.68%
Austria	0.07%	0.45%	7.22%	50.33%	41.93%
Italy	0.05%	0.64%	8.39%	52.15%	38.78%
Spain	0.00%	0.16%	2.81%	35.12%	61.92%
Russian Federation	0.11%	0.53%	6.68%	50.80%	41.87%
Slovenia	0.00%	0.83%	9.35%	53.12%	36.70%
Canada	0.00%	0.24%	5.07%	45.30%	49.35%
Turkey	0.22%	0.95%	7.00%	46.06%	45.77%
United Kingdom	0.15%	0.07%	4.76%	40.77%	54.24%
Egypt	1.16%	8.15%	20.95%	43.14%	26.60%
Grand Total	0.18%	1.13%	7.65%	48.15%	48.89%

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**Scoring:** Above 80% shows highest level of knowledge  
Between 61% and 80% shows a high level of knowledge  
60% or less shows a lower level of knowledge

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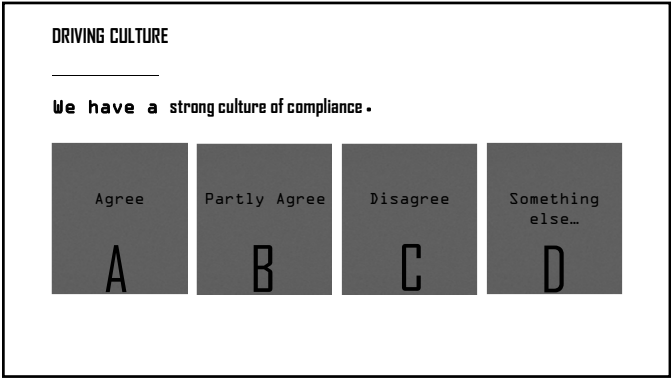
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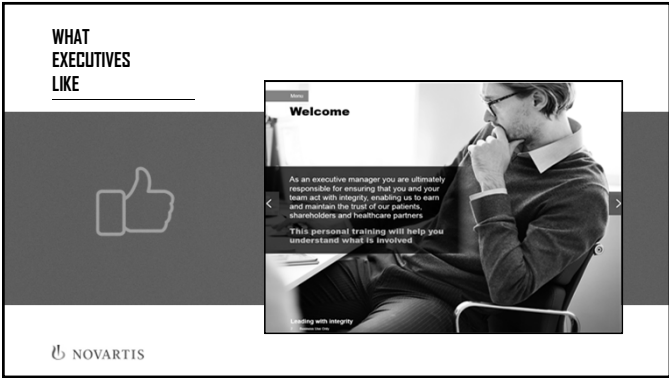
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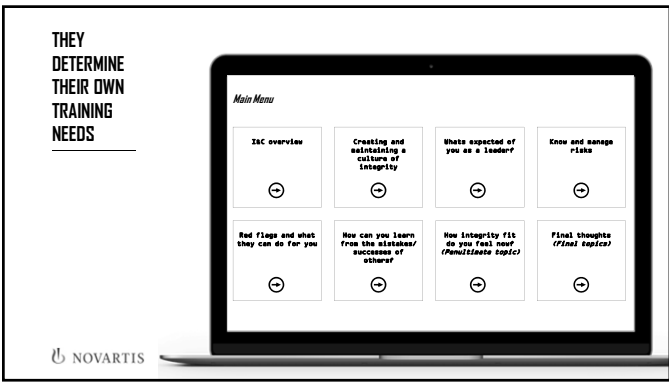
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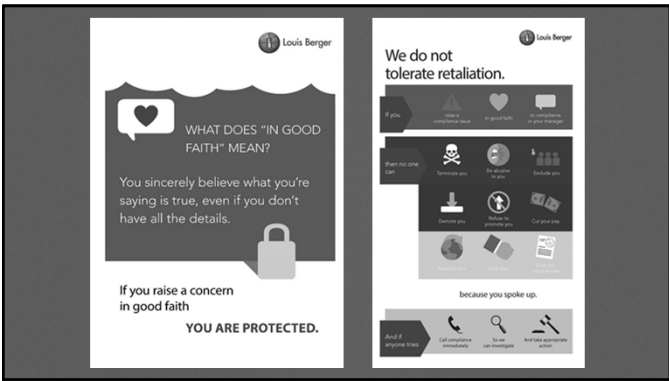
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Sistema de Gestión de Cumplimiento

PLANIFICAR, REALIZAR, COMPROBAR, AJUSTAR

 Para obtener más información, póngase en contacto con [ethics@louisberger.com](mailto:ethics@louisberger.com)

 Louis Berger

**Planificar**  
Identificar los riesgos, los controles y los objetivos

**Realizar**  
Proporcionar los recursos, informar, formar y ejecutar

**Comprobar**  
Realizar seguimiento del progreso y evaluar los resultados

**Ajustar**  
Repetir y modificar

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**ANTI-CORRUPTION**

**Louis Berger's Global Anti-Corruption Policy**  
Louis Berger conducts business with integrity. That means that we don't bribe, we keep accurate books and records, and we carefully manage potentially risky situations. This guide helps you understand your obligations under our Global Anti-Corruption Policy, but it isn't a substitute for it—so make sure you read and know the full Policy too.


**No Bribery**  
Never give, promise, offer, or authorize payment of anything of value to get or keep business or secure a business advantage—especially when working with government officials.


**Accurate Books & Records**  
Record all transactions transparently and in alignment with our processes. Never have any "off the books" accounts or other unrecorded funds.


**Guest Travel**  
Only offer to pay for travel expenses when it's for a legitimate business purpose and reasonable for the person's seniority.  
Remember: we require our guests to attend business activities, we don't give per diem cash, and we don't pay for food, drink or for parties and happy hours.


**Gifts and Entertainment**  
If you're giving a business gift, get approval according to the EPMMS business ethics and compliance requirements. Don't give it unless it's meant to reward something and you're not expecting anything in return.  
In addition, make sure any gift you want to give is:  

- Not cash or cash equivalent
- Not
- Reasonable and appropriate
- Delivered in writing
- Accepted and recorded

**Government Gifts**  
Get written approval from both the Office of Compliance and Ethics before engaging in meetings, an offer of employment to a government official.

**Due Diligence**  
Get formal approval from the Chief Compliance Officer before offering money, equipment, time or any other form to a political party or politician.

**Charitable Donations**  
Fill out the Charitable Contribution Approval form and get approval from your GRASShooter. Make before committing to any donations.

**Political Contributions**  
Get formal approval from the Chief Compliance Officer before offering money, equipment, time or any other form to a political party or politician.

**For more help: [ethics@louisberger.com](mailto:ethics@louisberger.com)**

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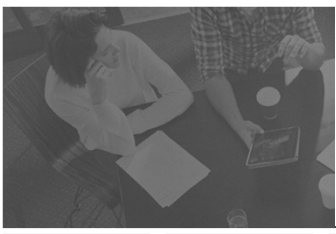
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Thank You!

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