

# Building a Global Compliance Training Program

## 2018

### Innovation and Strategy



**Britta Luescher**



**Peggy Dolin**



**Nichole Pitts**



Moderator



**Matt Plass**



**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.



# 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

## CHALLENGES FOR 2018

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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

## GOVERNANCE & STRATEGY

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How would you describe your compliance training strategy?

Consistent, articulated, measurable	Confused and inconsistent	We don't have one.	Something else...
A	B	C	D

## TRAINING STRATEGIES & GUIDELINES

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Internal  
Associates

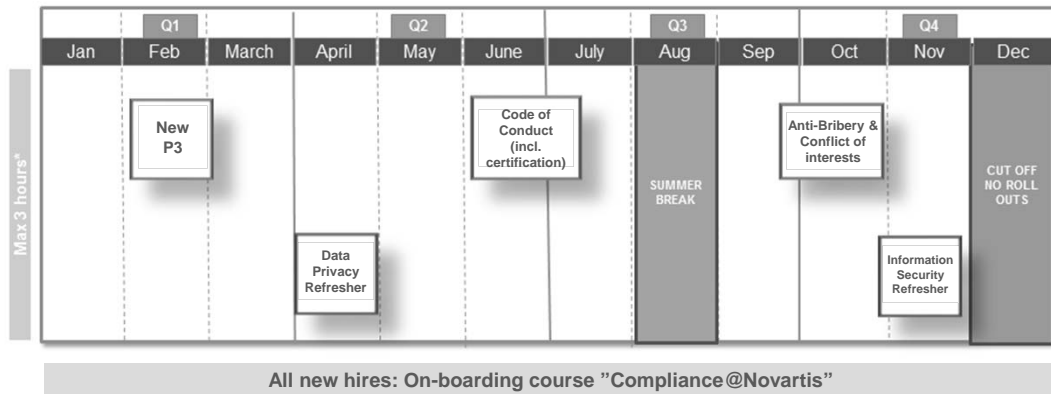


External  
Contractors



Third Parties and  
External Service  
Providers

## DO YOU TALK WITH YOUR PARTNERS?



## 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.

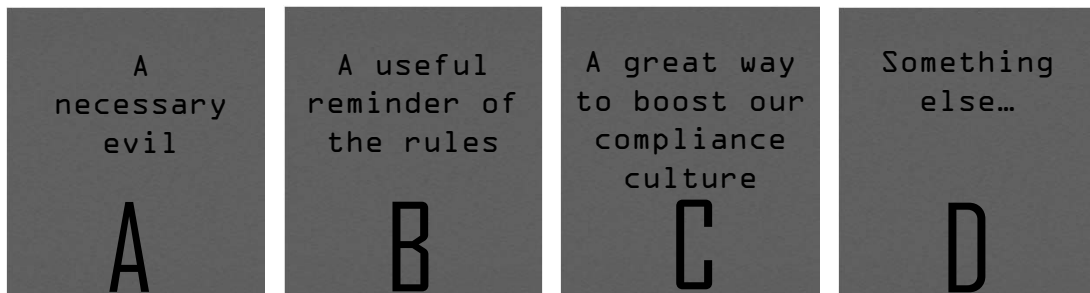
Ensure that compliance training and the transfer of knowledge are effective to manage risks and support business objectives;

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

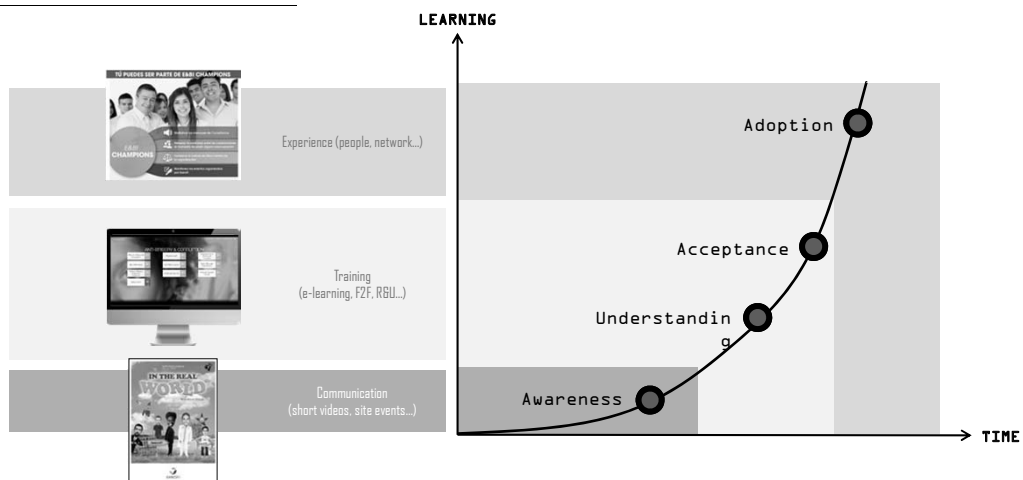


## BUILDING THE COMPLIANCE BRAND

How is compliance training perceived in your organization?



## HOW SANOFI APPLIES THE LEARNING CURVE



## COMPLIANCE CALENDAR



1. Kick-Off  
Campaign

2. 100%  
Workforce  
Competency

3. Compliance  
Is Everyday

4. Sustain  
the Buzz

5. Support Me  
In the Moment

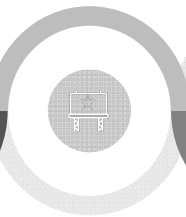
6. Keep Me  
Updated



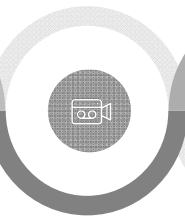
Email Template Kit  
January



Primary Learning  
January- February



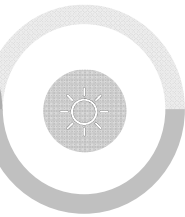
Intranet Banner Ad  
All Year



Video Booster  
Mar/Jun/Sep/Dec



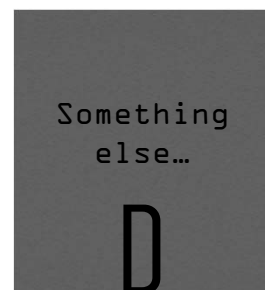
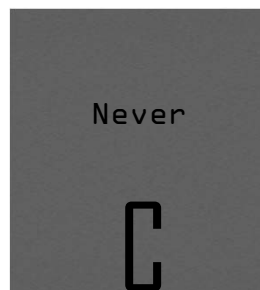
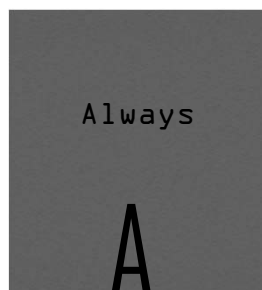
Infographics and  
Performance Support  
All Year



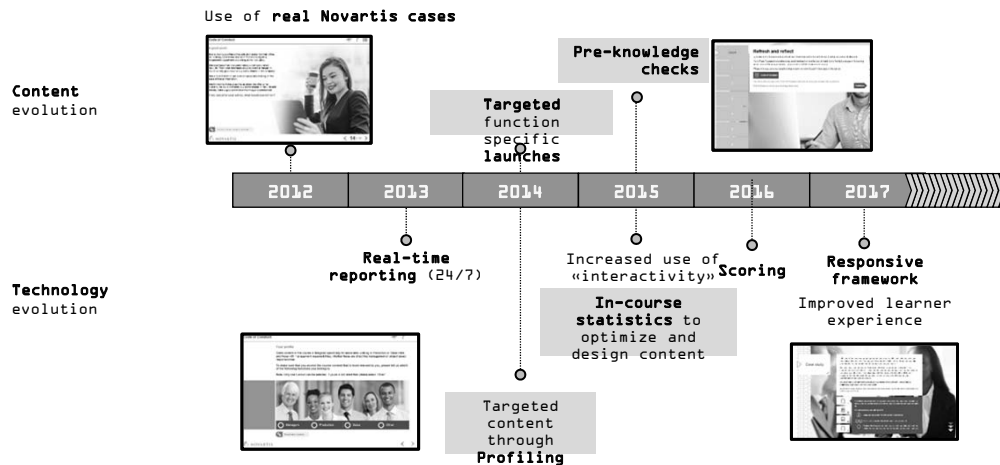
Updates & Refreshes  
Calendared and  
Just in Time

## REACHING YOUR PEOPLE

We get the right content to the right people at the right time .



## ARE YOU SETTING STANDARDS?



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## ARE YOU ASKING THE RIGHT QUESTIONS?

Group I&C  
Local Training Plan Support

### Designing a local training plan

#### Definition

A **training plan** is a document that guides the planning and delivery of locally delivered training. A well-developed training plan allows you to prepare for and deliver a thorough and effective curriculum to Functions and Associates based on their needs. Some key things to remember are that you want to be simple, organized, and realistic.

#### Key steps

1. Understand and assess the risks and identify corresponding training gaps/needs
2. Define target groups according to needs/gaps analysis
3. Select training content and frequency
4. Select training tool, resources and delivery methods

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## TRAINING LANGUAGE IS A KEY ELEMENT



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**GIVE THE CHOICE TO THE LEARNER**

SANOFI

Essentials on Ethics in the Workplace - English  
 Essentials on Ethics in the Workplace - Arabic  
 Essentials on Ethics in the Workplace - Bulgarian  
 Essentials on Ethics in the Workplace - Chinese  
 Essentials on Ethics in the Workplace - Czech  
 Essentials on Ethics in the Workplace - French  
 Essentials on Ethics in the Workplace - German  
 Essentials on Ethics in the Workplace - Hungarian  
 Essentials on Ethics in the Workplace - Indonesian  
 Essentials on Ethics in the Workplace - Italian  
 Essentials on Ethics in the Workplace - Japanese  
 Essentials on Ethics in the Workplace - Korean  
 Essentials on Ethics in the Workplace - Polish  
 Essentials on Ethics in the Workplace - Portuguese  
 Essentials on Ethics in the Workplace - Romanian  
 Essentials on Ethics in the Workplace - Russian  
 Essentials on Ethics in the Workplace - Spanish  
 Essentials on Ethics in the Workplace - Thai  
 Essentials on Ethics in the Workplace - Turkish

China (321)  
 China (15)  
 China (4)  
 China (891)  
 China (11)  
 China (6)  
 China (8)  
 China (4)  
 China (3)  
 China (3)  
 China (3)  
 China (5)  
 China (3)  
 China (26)  
 China (3)  
 China (3)  
 China (6)  
 China (3)  
 China (3)



## COMPLIANCE & ETHICS TOOLKIT

Welcome to the Compliance & Ethics Toolkit

The Office of Compliance & Ethics is committed to overseeing a global best-practice program that promotes and ensures ethical business conduct, compliance with laws, and a welcoming culture for employees and clients. This toolkit provides resources on a variety of different topics and issues.







Louis Berger

## COMPLIANCE & ETHICS TOOLKIT

**Global Anti-Corruption**

Louis Berger is committed to doing business with integrity. This means avoiding corruption of all kinds, including bribery of government officials and private companies and individuals. The nature of our business often requires that we interact with officials of various governments around the world. Our Code of Business Conduct, the law and our global anti-corruption policy establish certain limits on those interactions, particularly where we might be providing something of value to a government official, private company or individual.

**Global Anti-Corruption Policy**  
Louis Berger's global anti-corruption policy commits the firm and its wholly owned subsidiaries to conducting business ethically and with the utmost integrity. This policy requires compliance with all applicable laws and regulations against bribery and corruption.

EN | FR | ES | AR | HIN |  
POR | ROM | SER

**Global Anti-Corruption Policy Quick Reference Guide**  
This quick reference guide serves as a supplement to the more detailed and global anti-corruption policy. This document provides you with a user-friendly, high-level overview of our policy to help you understand how you may come across bribery in your day-to-day activities.

EN | FR | ES | AR | HIN |  
POR | ROM | SER

**Global Anti-Corruption Policy FAQ**  
This document provides answers to frequently asked questions regarding the global anti-corruption policy.

EN | FR | ES | AR | HIN |  
POR | ROM | SER

**Global Anti-Corruption Policy Case Scenarios**  
Examples include scenarios involving facilitation payments, fraud, unusual fees, and joint ventures.

EN | FR | ES | AR |  
HIN | POR | ROM | SER

**Corruption and Bribery**

Hope those gifts are for a prospect, client or vendor.

**Corruption and Bribery**  
In general, "corruption" refers to the giving or receiving of bribes. A bribe is the offering, giving, receiving, or soliciting of any item of value to influence the actions of a government official or other person in charge of a public or legal duty. In most cases, corruption involves bribery of a government official who, in return, awards an unfair benefit.

The bribe causes a problem because the government official's judgment is "corrupted." Bribery is never tolerated in any form within Louis Berger or from any of our business partners or third parties. Make sure corruption and bribery do not occur and report any suspicious activity.

For additional information, read our Global Anti-Corruption Policy.

This video is available in English, French, Spanish, Arabic, Chinese, Portuguese and Russian. Click here.

**ETHICS IN ACTION**  
VIDEOS & GUIDES BY SUBJECT

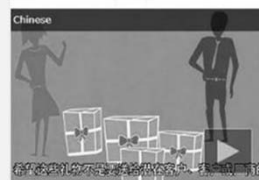
CLICK HERE >>



Louis Berger

## COMPLIANCE & ETHICS TOOLKIT

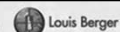
### VIDEOS SUBTITLED IN MULTIPLE LANGUAGES





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## SAFETY & ETHICS MOMENTS



### MEETING MOMENTS

FEBRUARY 2017

[HAZ CLIC AQUÍ](#) | [CLIQUEZ ICI](#)

#### Corporate Citizenship

Louis Berger is committed to giving back to the communities in which we do business and adhering to our mission of improving the quality of life around the world. We are committed to delivering exceptional services to our clients and business partners, providing a work environment that allows employees to meet their professional goals and ensuring our work results in a positive contribution to society.

#### Chemical Safety

Chemicals are a major part of our everyday life — at home and at work. Examples include toxics, corrosives, solvents and numerous other substances. As long as we take proper precautions, these substances can be handled safely.

Chemicals that you use at home include gasoline, paints, fertilizers, lawn chemicals, insect spray, bleach and other household cleaners. However, chemicals you may use at work are facility-specific solvents, laboratory chemicals, fuels, paint, office copier chemicals, correction fluid, lubricants and corrosives.

#### COMPLIANCE & ETHICS

#### TH NK SAFETY

#### COMPLIANCE & ETHICS

##### Week 1: Charitable Contributions

Louis Berger supports giving back to our communities through charitable contributions, pro bono assistance, volunteering and partnerships with local charitable and professional organizations. Any employee making a request for a Louis Berger charitable donation should follow the guidelines outlined in the 'Charitable Giving' section of the [Global Anti-Corruption Policy](#). Through this process, Louis Berger takes reasonable steps to ensure that a contribution is not an illegal payment to a government official or other entity and does not violate our Code of Conduct or policies in any way.

#### HEALTH & SAFETY

##### Week 1: Ways of Exposure

We are exposed to chemicals by these ways:

- Inhalation: Breathing in dusts, mists and vapors – Example: Working with bags of concrete at home without a respirator.
- Ingestion: Eating contaminated food – Example: Having lunch in the work area where there are airborne contaminants or not washing hands before eating.
- Absorption: Skin contact with a chemical – Example: Contact dermatitis or an eye irritation.
- Injection: Forcing an agent into the body through a needle or a high-pressure device – Example: Needle stick or misuse of a high pressure washer.

##### Week 2: How to protect against Chemical Hazards

You can protect yourself against chemical hazards by:

- Reading container labels, material safety data sheets (MSDS's) and safe-work instructions before you handle a chemical.
- Using specified personal protective equipment (PPE) that may include chemical splash goggles, a respirator, safety gloves, apron, steel-toed shoes, safety glasses with side shields, etc. Ensure the PPE fits properly and you are trained in its use.
- Inspecting all PPE before you use them. Look for defects in the equipment such as cracks, missing parts, rips etc. Ensure your respirator has the proper chemical cartridge for the particular chemical hazard. Change cartridges when it is necessary.
- Knowing the location of safety showers and eyewash stations and how to use them.
- Washing your hands before eating, especially after handling chemicals.
- Leaving your contaminated clothing at work. If you wear clothes home you can expose your family to hazards.



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## ETHICAL MOMENTS®:

# ETHICAL BEHAVIOR: SHAPING OUR CULTURE





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## COMPLIANCE CHAMPION PROGRAM

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### Who?

- Individual identified by leadership that truly believes in compliance.
- They are not compliance officers, but liaisons between the OCE and your business/group/project

### What does a Compliance Champion do?

- The CC is responsible for bringing awareness of the compliance program to their business/department/project/group
- Help identify major areas of exposure
- Encourage employees to speak up whenever they encounter potential violations
- Continue to reinforce the Code of Business Conduct

## MEASURING EFFECTIVENESS

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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

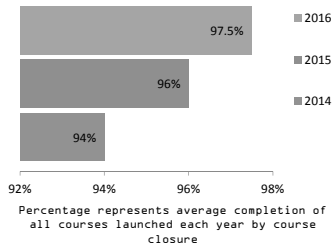
C

Something else...

D

## ARE YOU SUCCESSFUL?

Cumulative completion uptake growth year after year



### Code of Conduct understanding

Global top norm	Company wide result
68%	92 - 95%*

\* Results based on multiple survey tools launched from 2013 to 2017 and represent the top 2 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

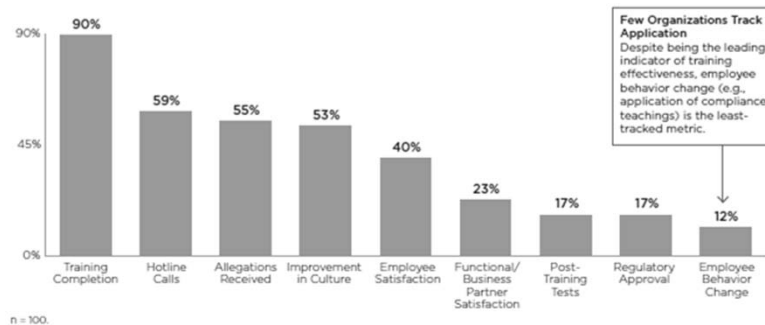
Measured criteria	2014	2015	2016	2017
The course is helpful to me doing my job	86%	88%	89%	87%
The content is interactive and engaging	91%	94%	94%	95%

## WHAT GETS MEASURED?

### CURRENT APPROACH TO MEASURING EFFECTIVENESS

Most Frequently Tracked Metrics

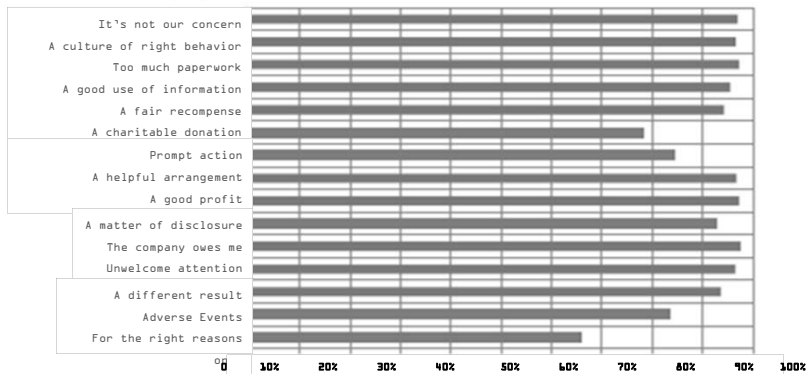
Which of the following metrics do you use to demonstrate the effectiveness of your compliance and/or ethics training program?



Source CEB 2013

## DID YOU CHECK FOR GAPS?

The chart below shows the percentage scores in each of the 15 dilemmas. The dilemmas which had the lowest percentage scores overall are highlighted in **orange** below and are examined in more details on the following pages



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### Wrong answer confidence

Very confident	51%
Fairly confident	40%
Not very confident	10%

Function	Percentage incorrect
Product Supply Chain	21%
Production / Manufacturing	20%
Sales	17%
Quality	17%
Admin & Facility	16%

## MARKETS LIKE NUMBERS...

Country	0-20%	21-40%	41-60%	61-80%	81-100%
China	0.17%	1.39%	6.33%	40.59%	51.53%
Germany	0.03%	0.39%	4.86%	44.54%	50.18%
Japan	0.06%	0.88%	15.98%	50.88%	32.21%
India	0.34%	2.81%	14.04%	51.13%	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%	0.29%	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%
<b>Grand Total</b>	<b>0.18%</b>	<b>1.13%</b>	<b>7.65%</b>	<b>45.15%</b>	<b>45.89%</b>

**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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## DRIVING CULTURE

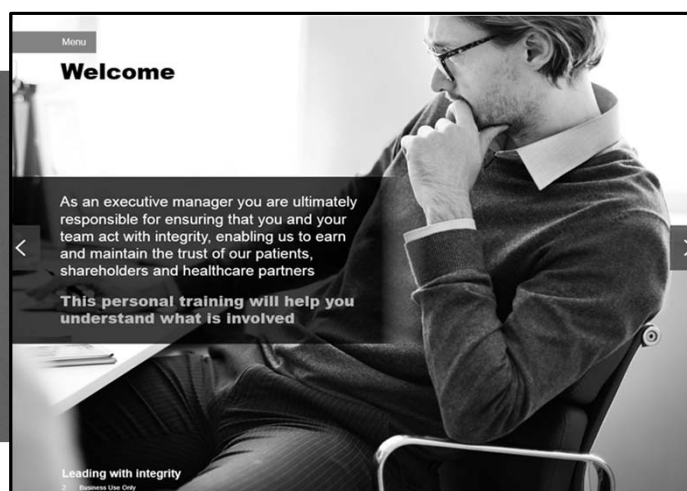
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We have a strong culture of compliance .

Agree	Partly Agree	Disagree	Something else...
A	B	C	D

## WHAT EXECUTIVES LIKE

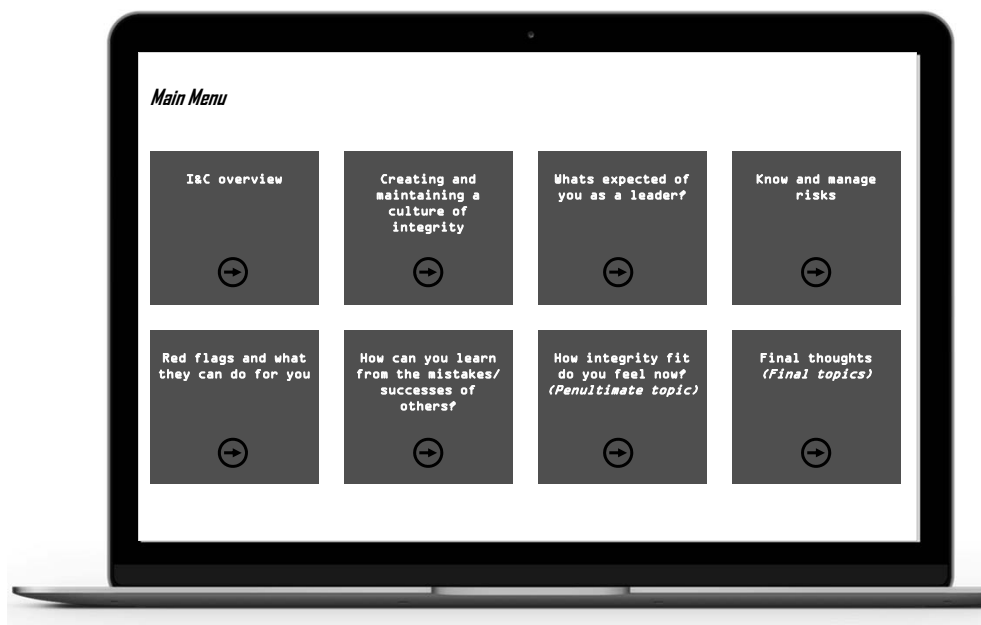
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## THEY DETERMINE THEIR OWN TRAINING NEEDS

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WHAT DOES "IN GOOD FAITH" MEAN?

You sincerely believe what you're saying is true, even if you don't have all the details.



If you raise a concern in good faith

**YOU ARE PROTECTED.**

 Louis Berger

We do not tolerate retaliation.



because you spoke up.





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



## 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

# 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 side trips or for friends and family to come.

## Gifts and Entertainment

If you're giving a business gift, get approval according to the DRAM/Authority matrix and document it transparently. Only give if there's no award or renewal pending and you're not expecting anything in return.

In addition, make sure any gift you want to give is:



Not cash or cash equivalent



Legal



Reasonable and appropriate



Within our policy limits



Infrequent and occasional



### Government Hires

Get written approval from HR and the Office of Compliance and Ethics before engaging or making an offer of employment to a government official.



### Due Diligence

Tell your Compliance & Ethics Officer and Procurement when you identify a new business partner; they'll help you through the due diligence process.



### Charitable Donations

Fill out the Charitable Contribution Application Form and get approval from your DRAM/Authority Matrix before committing to any donations.



### Political Contributions

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

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





**Thank  
You!**