







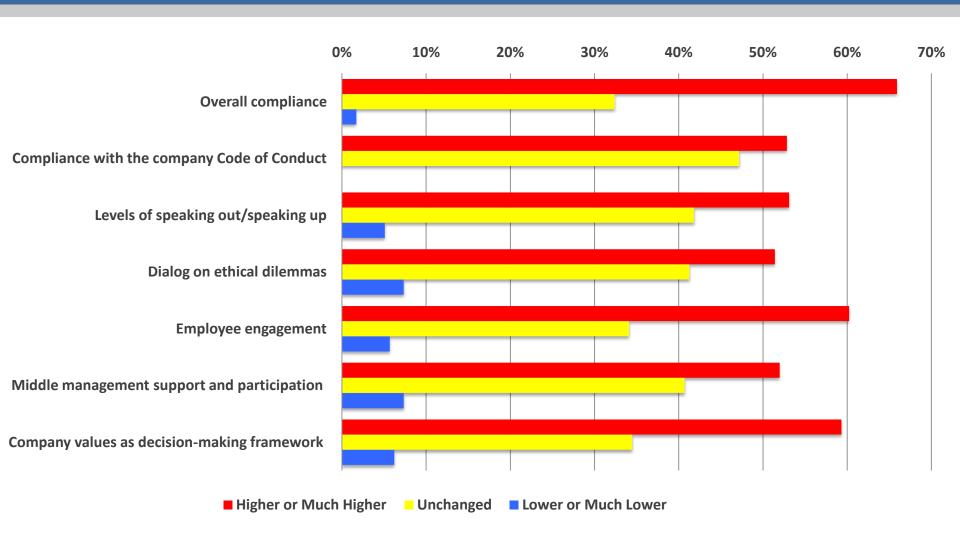
CORPORATE CULTURE AS A TOP-LEVEL CONTROL

Jim Berg, Vice President, Chief Ethics and Compliance Officer - Apollo Education Group Rudy Green, Vice President & Chief Compliance Officer - University of Miami Sozeen Mondlin, Director of Compliance & Associate General Counsel – MITRE Corporation Wayne Brody, LRN (Moderator)





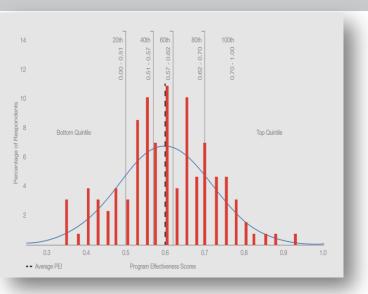
Over the Past Three Years, Compliance Measures Are Up

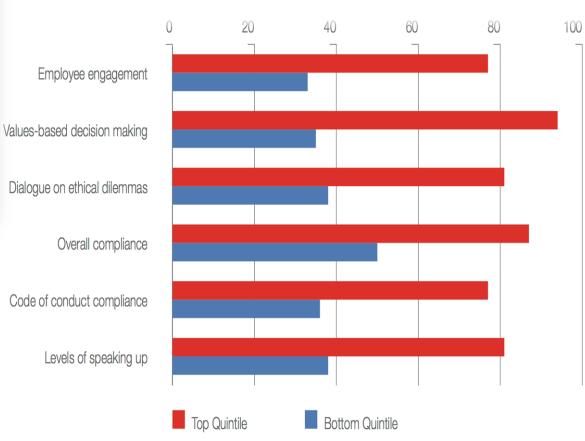






But More So for Some Than Others





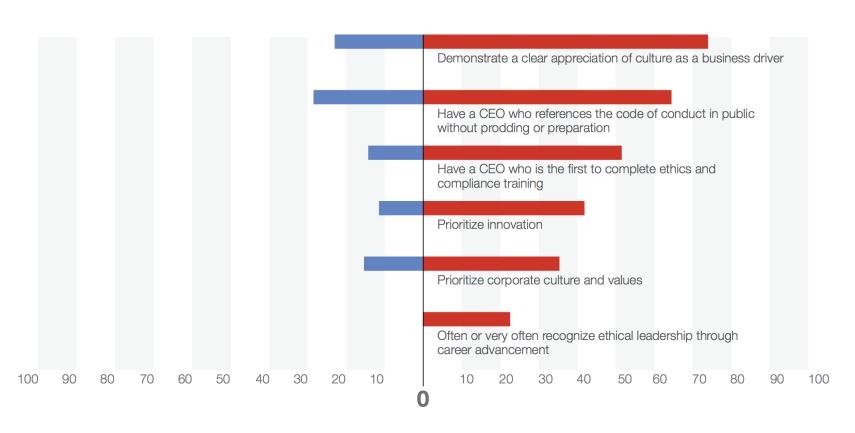




Why: Context Matters

Above and Beyond: Corporate Differentiators

Lower Quintile 0.43 Upper Quintile 0.75

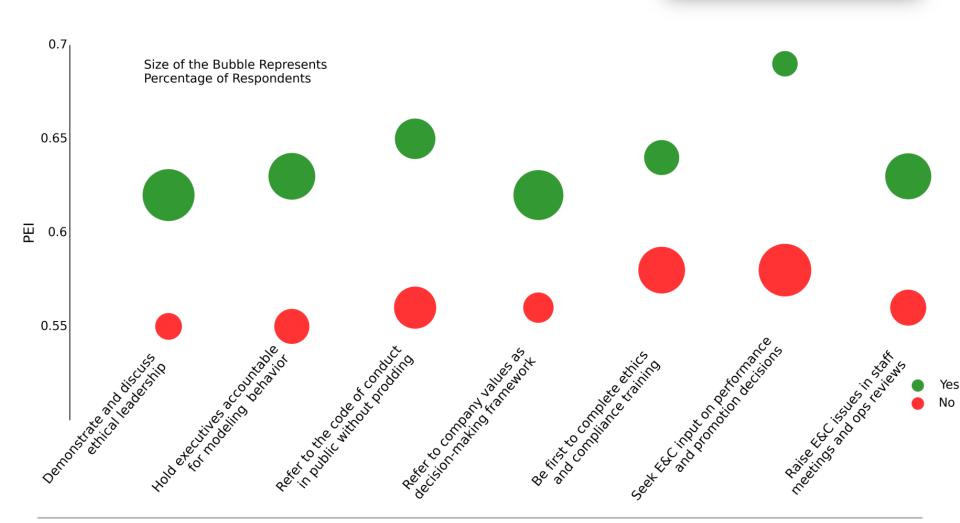






The Impact of the Tone at the Top is Reflected in Many Ways

Reporting to:	MEP	LEP
General Counsel	35%	65%
CEO	32%	12%
Board of Directors	29%	12%
Other	3%	12%







Corporate Goals Matter







When the Business "Does Compliance"

Corporate Priorities

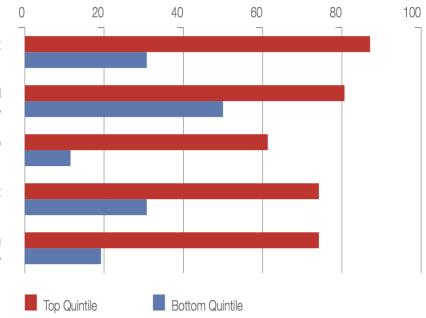
Motivating middle management to expressly address E&C issues

Having a clearly stated and communicated non-retaliation policy

Using all available channels to celebrate employees who speak up

Ensuring frequent management messaging regarding speaking up

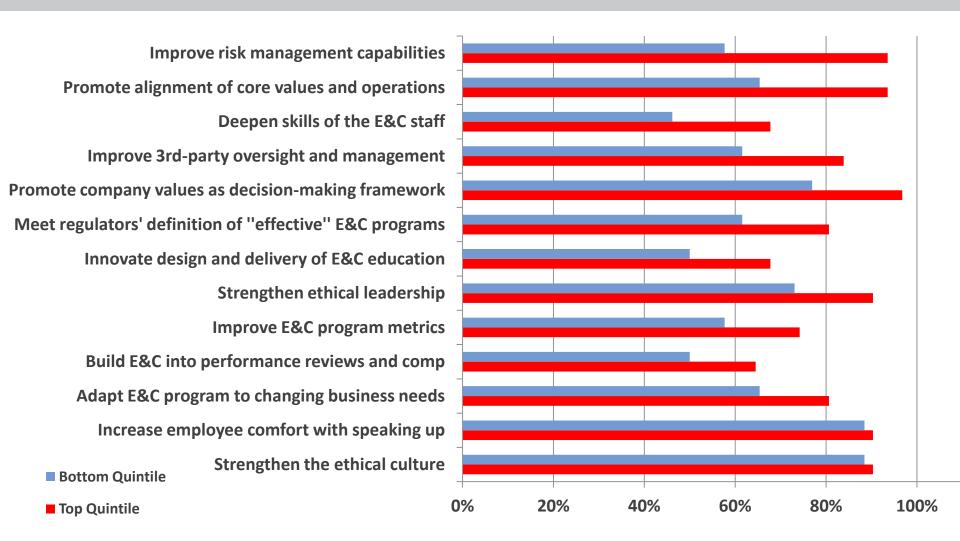
Clarifying all the ways employees can communicate within the company







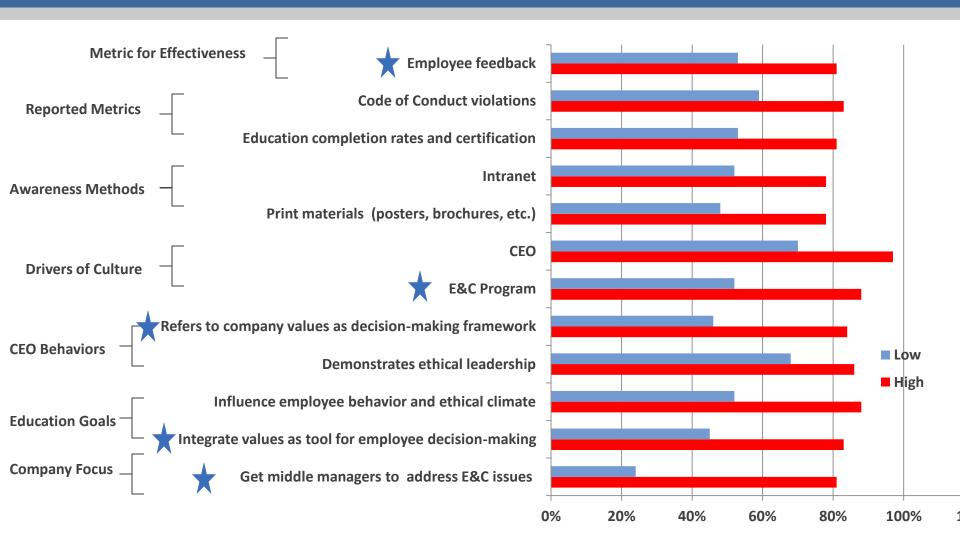
Everybody Wants to Build an Ethical Culture; Not as Many Know How







Many Aspects to Impact: Differences Between Programs With High-Impact vs. Low-Impact Education







Many Levers Are Within Reach

Have made substantial progress on continuous improvement

Measure ed/com effectiveness on behavioral outcomes

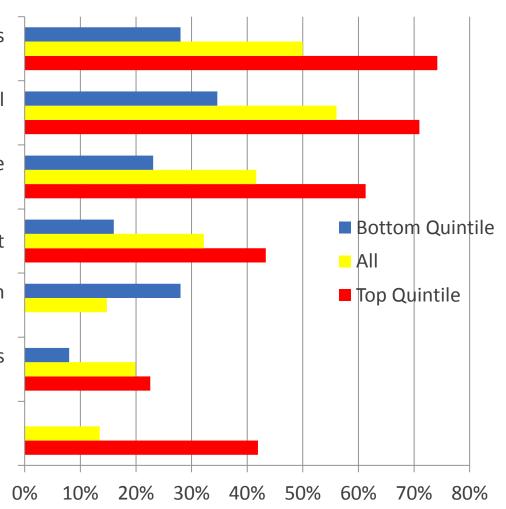
Measure ed/com effectiveness on corporate outcomes

Conduct annual E&C program assessment

We do not roll out theme-based ed/com campaigns

Implement theme-based ed/com campaigns quarterly

Frequently and publicly celebrate ethical leadership







LRN® Inspiring Principled Performances

how