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)

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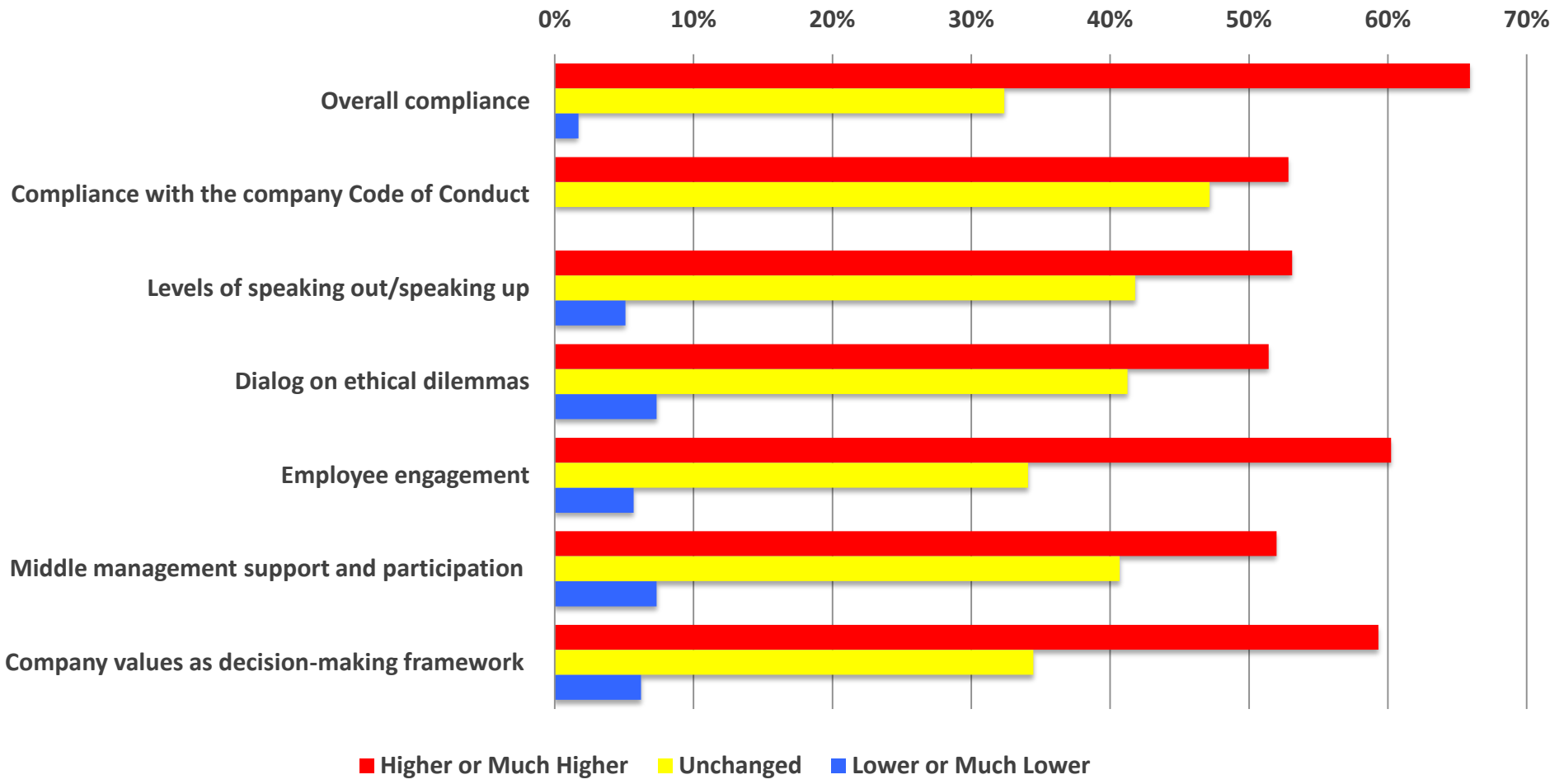
Over the Past Three Years, Compliance Measures Are Up



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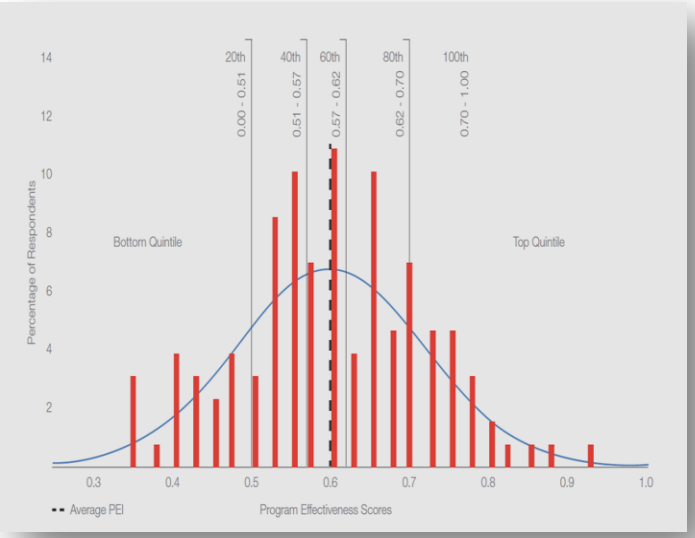
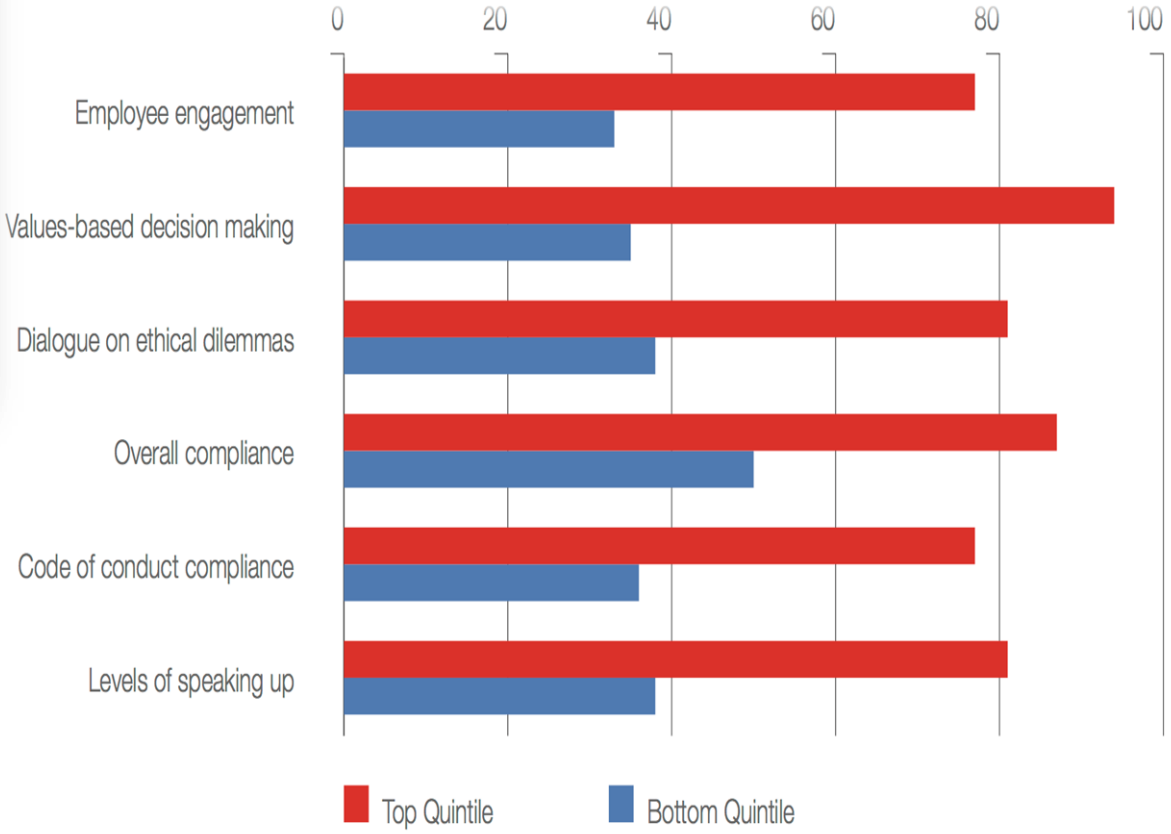
But More So for Some Than Others





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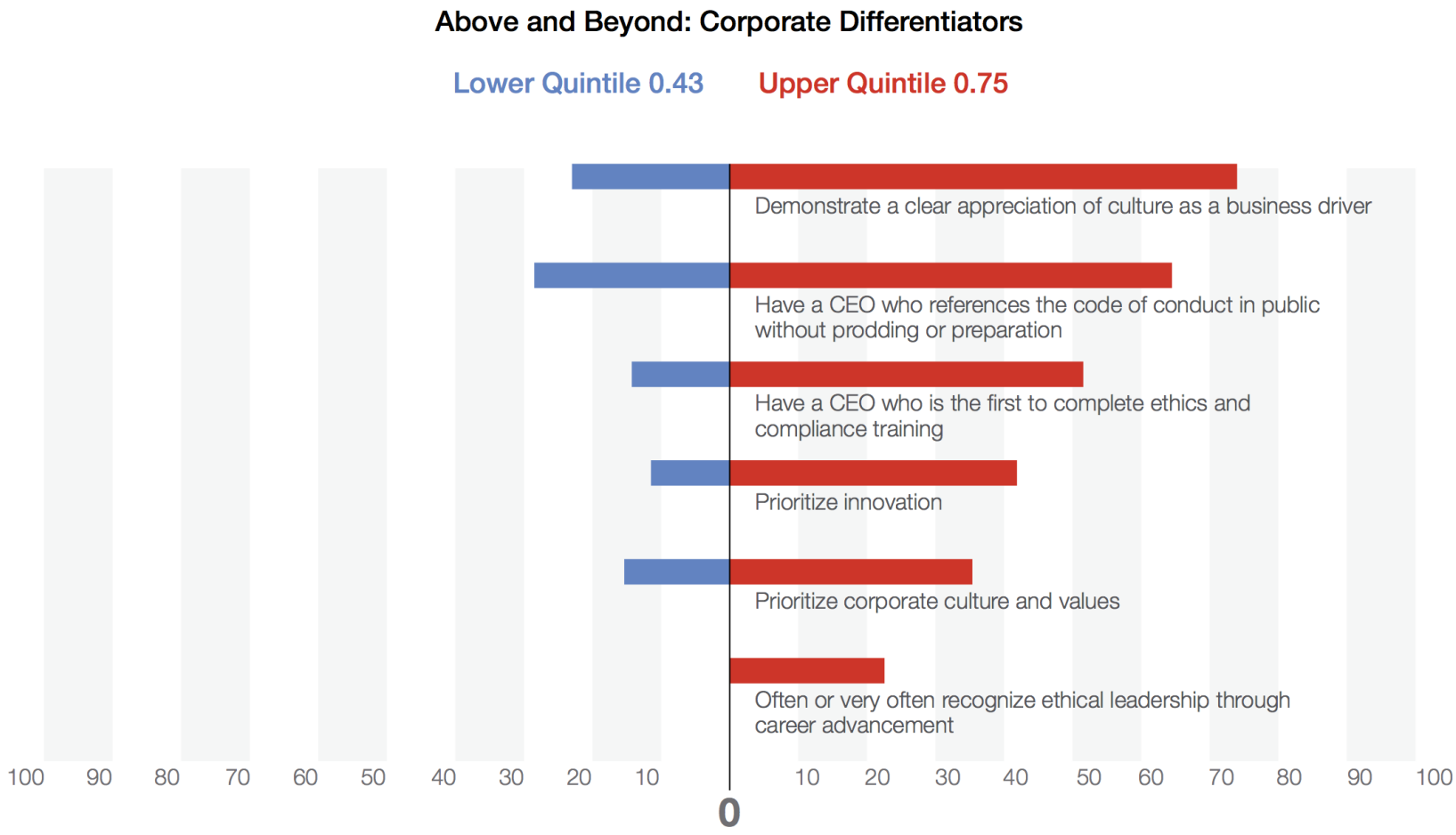
Why: Context Matters



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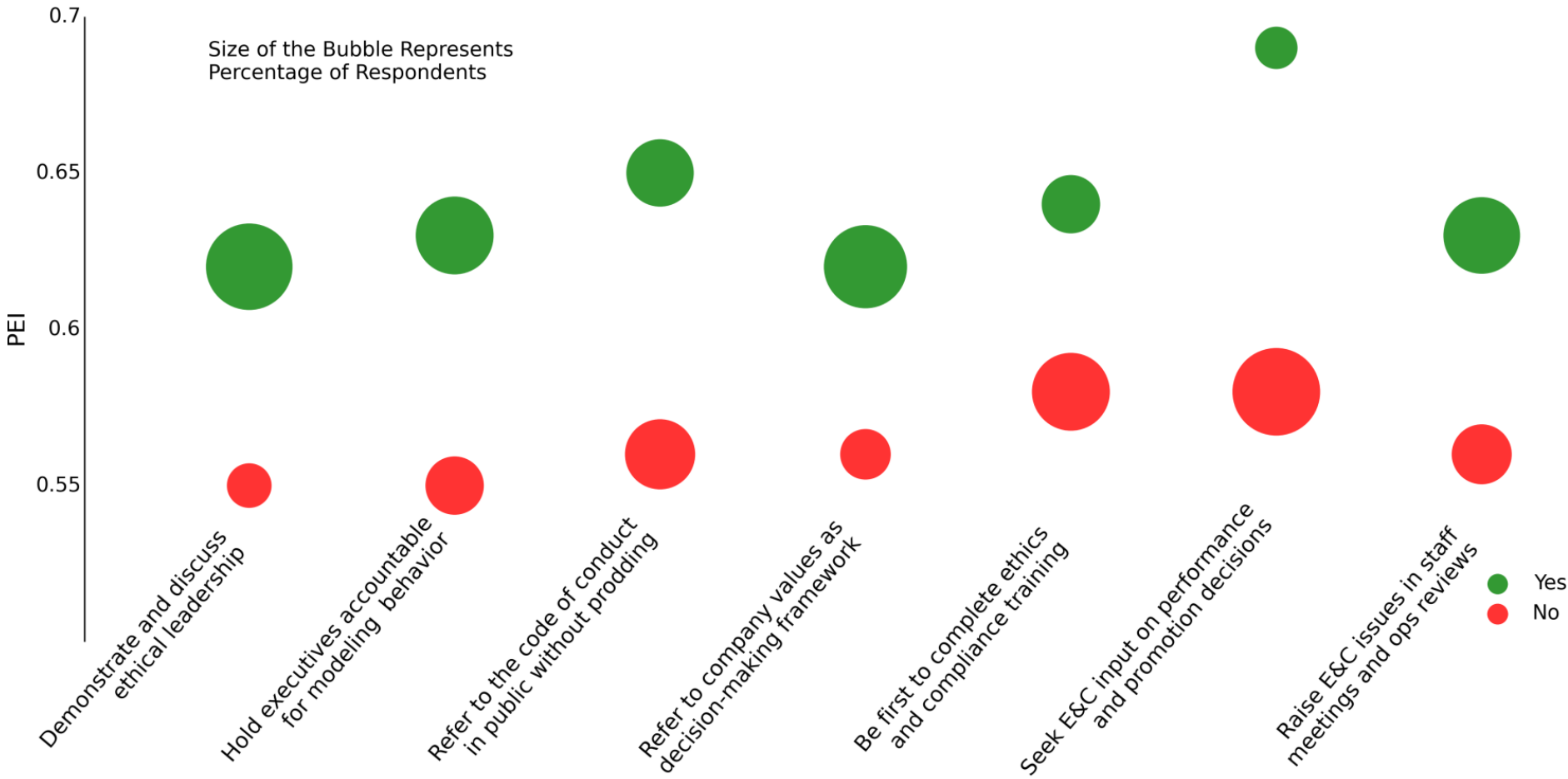
The Impact of the Tone at the Top is Reflected in Many Ways

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



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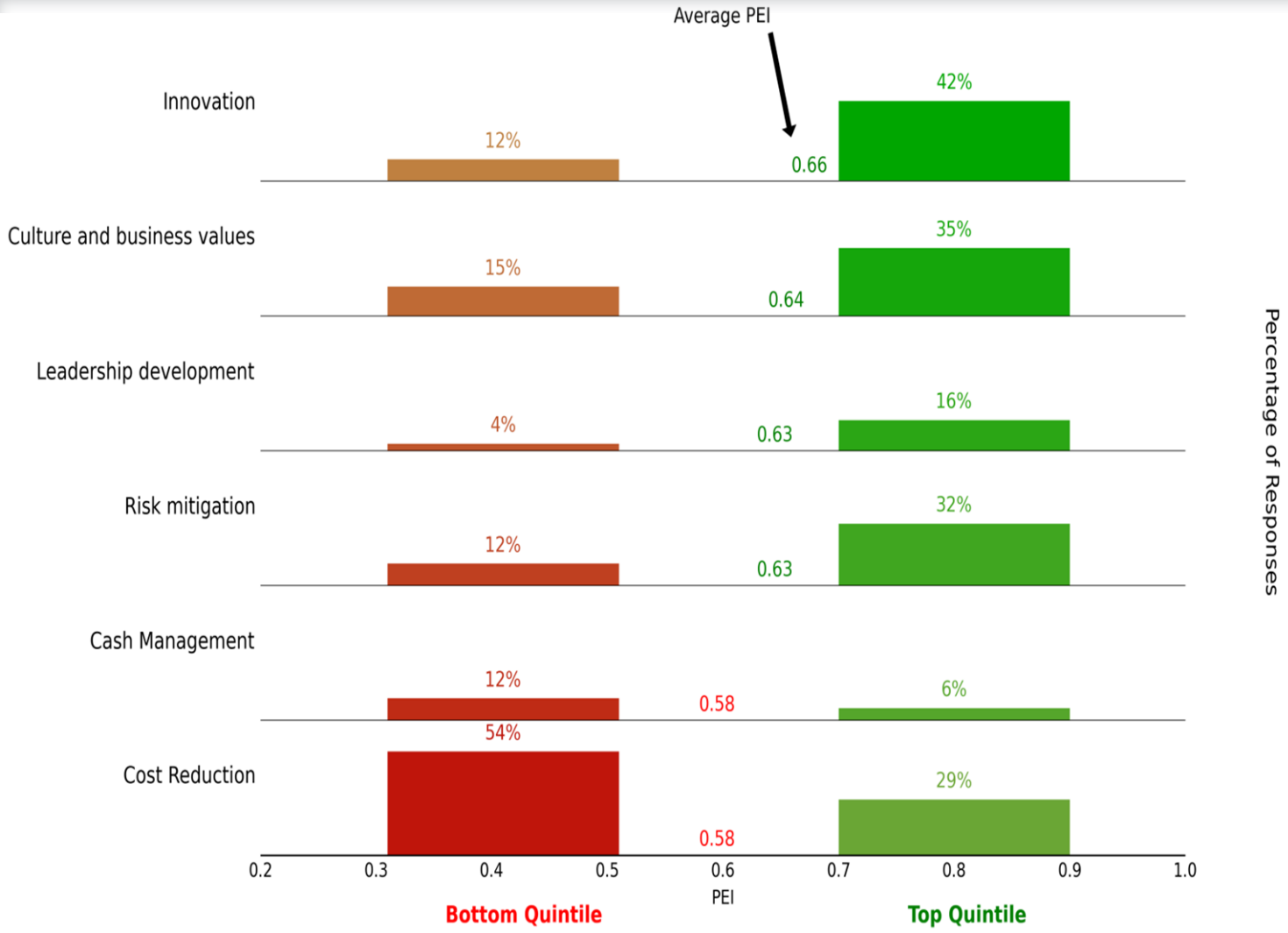
Corporate Goals Matter



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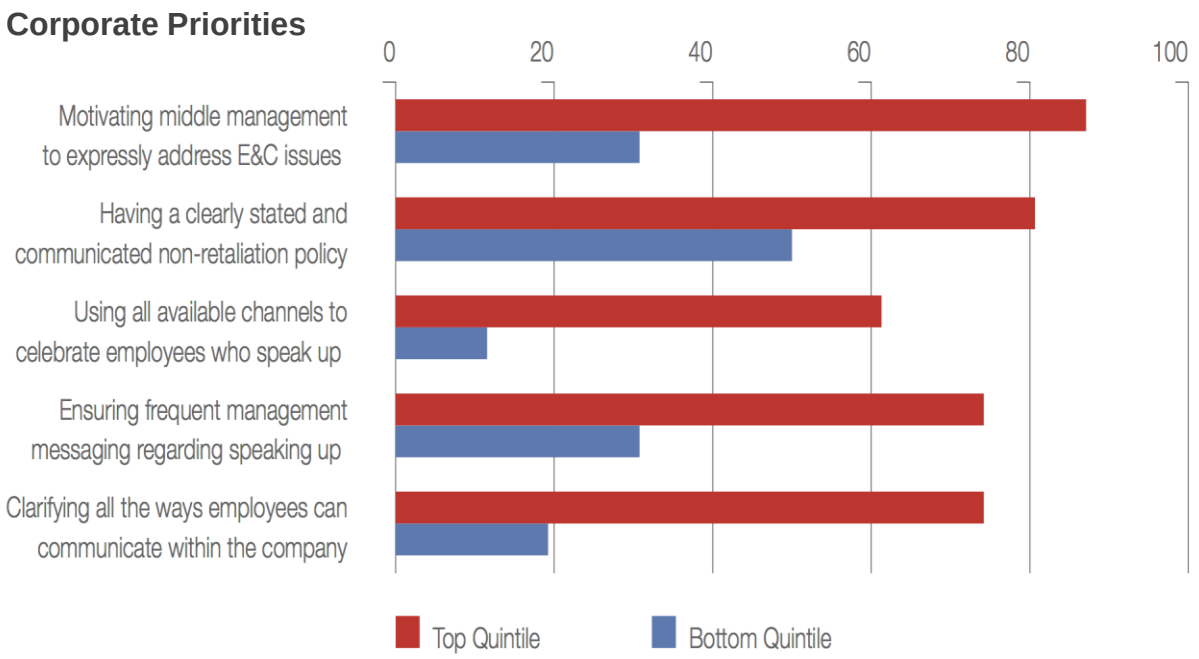
When the Business "Does Compliance"



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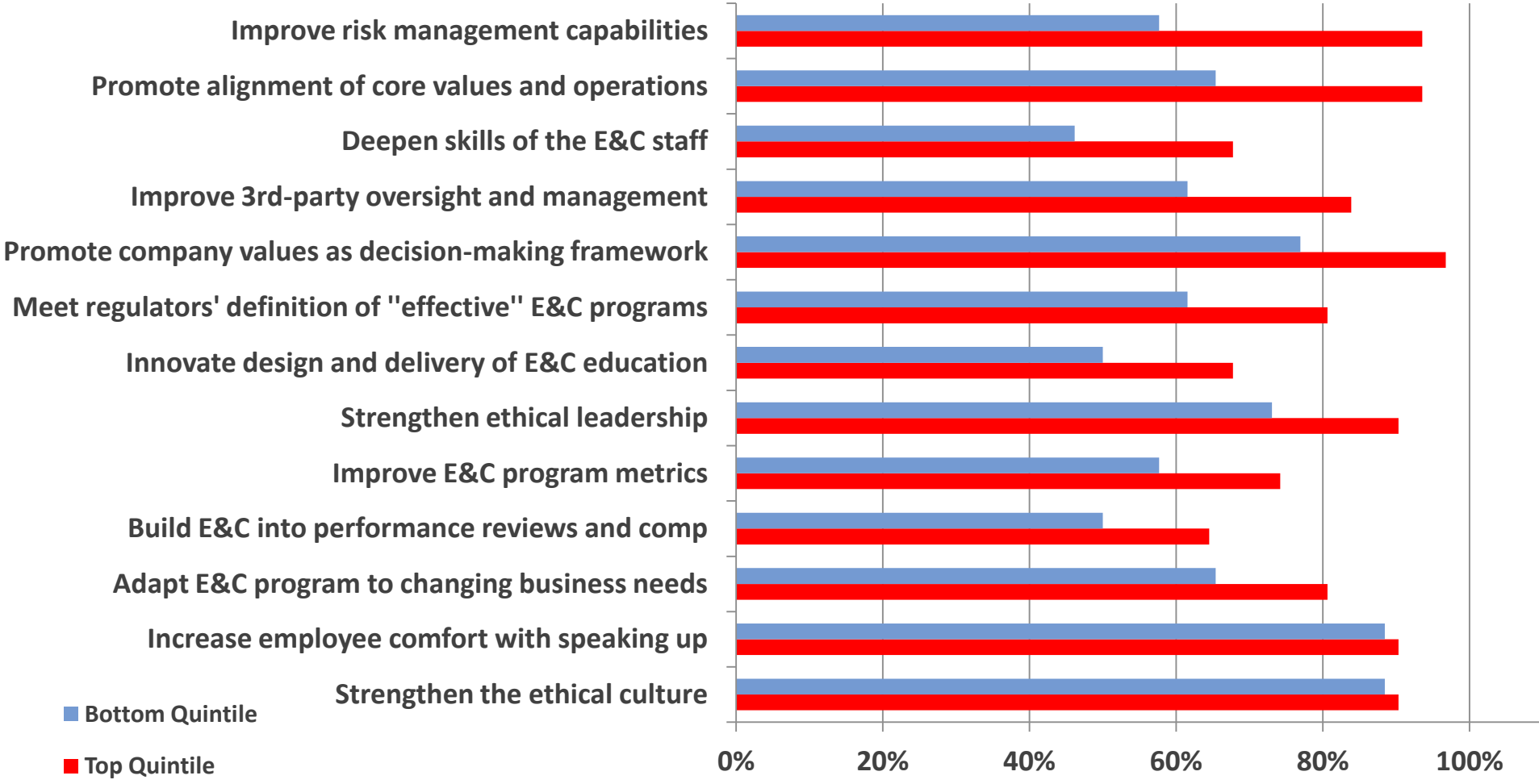
Everybody Wants to Build an Ethical Culture; Not as Many Know How



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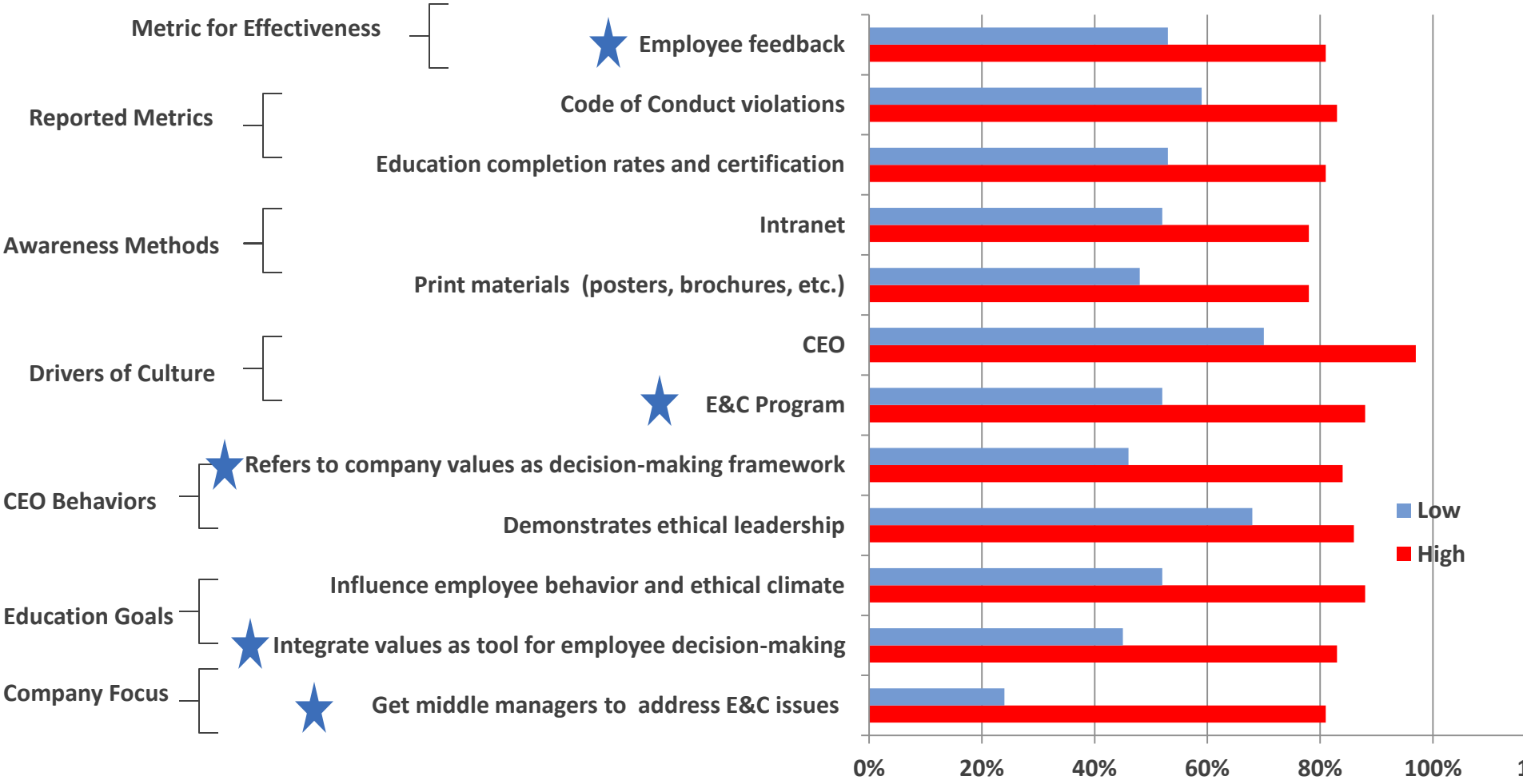
Many Aspects to Impact: Differences Between Programs With High-Impact vs. Low-Impact Education



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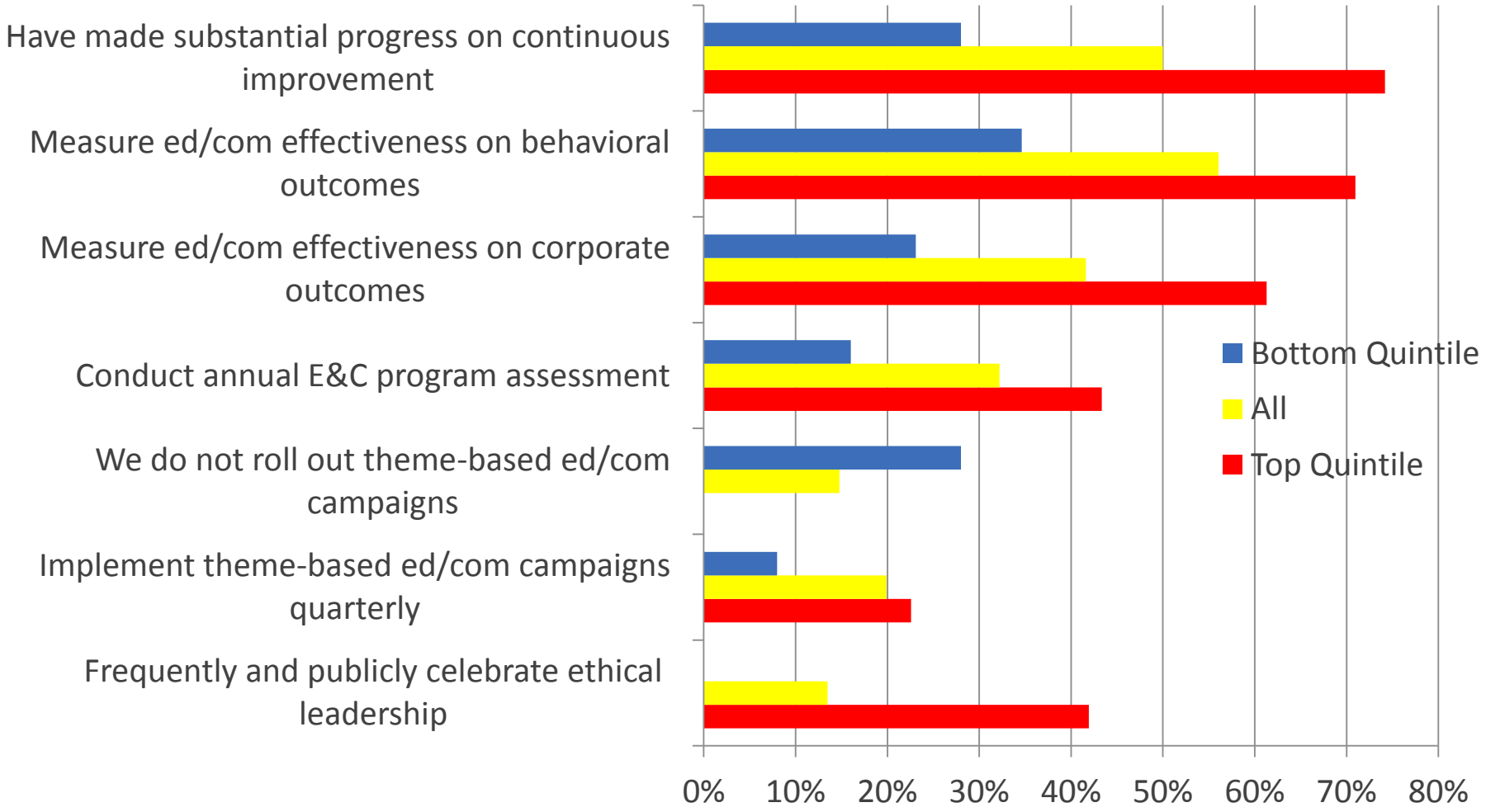
Many Levers Are Within Reach



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