

# Anti-Corruption Training That's Effective for Employees, Useful for You

**Paula Davis**

**SAI Global**

Director, Compliance Programme  
Operations, EMEA



**COMPLIANCE WEEK** **2013**  
POWERFUL INSIGHTS, PRACTICAL IDEAS, REAL SOLUTIONS

#CW2013

# Cambridge Silicon Radio's Challenge

## Business Objectives

- Respond to incoming legislation – the UK Bribery Act 2010
- Enable all employees to understand the impact of the law on them and the business
- Reinforce CSR's zero tolerance stance on bribery and corruption
- Mitigate the risk of bribery
- Create competitive advantage by embedding an anti-bribery culture

## Programme Learning Objectives

- Recognise the forms of corruption to which CSR might be exposed
- Highlight the severe consequences of involvement in corruption for CSR and individual employees
- Reinforce the message that rejecting bribery is the responsibility of all employees
- Recognise the 'red flags' that corruption may be occurring
- Describe when and how to report suspected corruption
- Provide employees with the knowledge and motivation to behave in line with the law and company values

# What is effective anti-corruption training?

“Culture eats ~~strategy~~ <sup>rules</sup> for breakfast”

*Mark Fields, President Ford North & South American Auto Operations*

*Wall Street Journal, 23 January 2006*

- Non-compliance is the gap between the law and the **behaviors** of our employees
- **Effective** training and awareness can close the gap and mitigate risk
- ... and drive a culture of compliance

# What is effective anti-corruption training?



- **Attitudes** - how employees feel about compliance, whether it seems important and their disposition to act
- **Knowledge** - understanding of compliance issues and requirements
- **Behavior** - key to compliance and is a result of employees putting their attitudes and knowledge into practice

*Effective compliance training addresses all three elements*

# The Solution

## Personalized

The screenshot shows a web-based quiz titled 'Preventing Bribery and Corruption'. It features a 'Welcome Back!' message and a table of questions with 'Yes' and 'No' radio button options. The questions are:

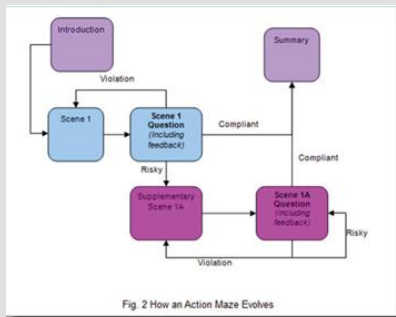
- Do you apply for licences and permits or deal with public officials?
- Do you work with suppliers, agents, contractors or other third parties?
- Do you travel overseas as part of your role?
- Are you responsible for or involved in making purchasing decisions?
- Do you sell products or services to customers and clients as part of your role?
- Do you manage any individuals or teams?

Below the questions is an 'Audio' section with a 'With Audio' dropdown and a 'Language' dropdown set to 'English'. There are 'Continue' and 'Change Selection' buttons. At the bottom, there is an illustration of a group of business professionals.

## Relevant and credible



## Interactive



## Engaging



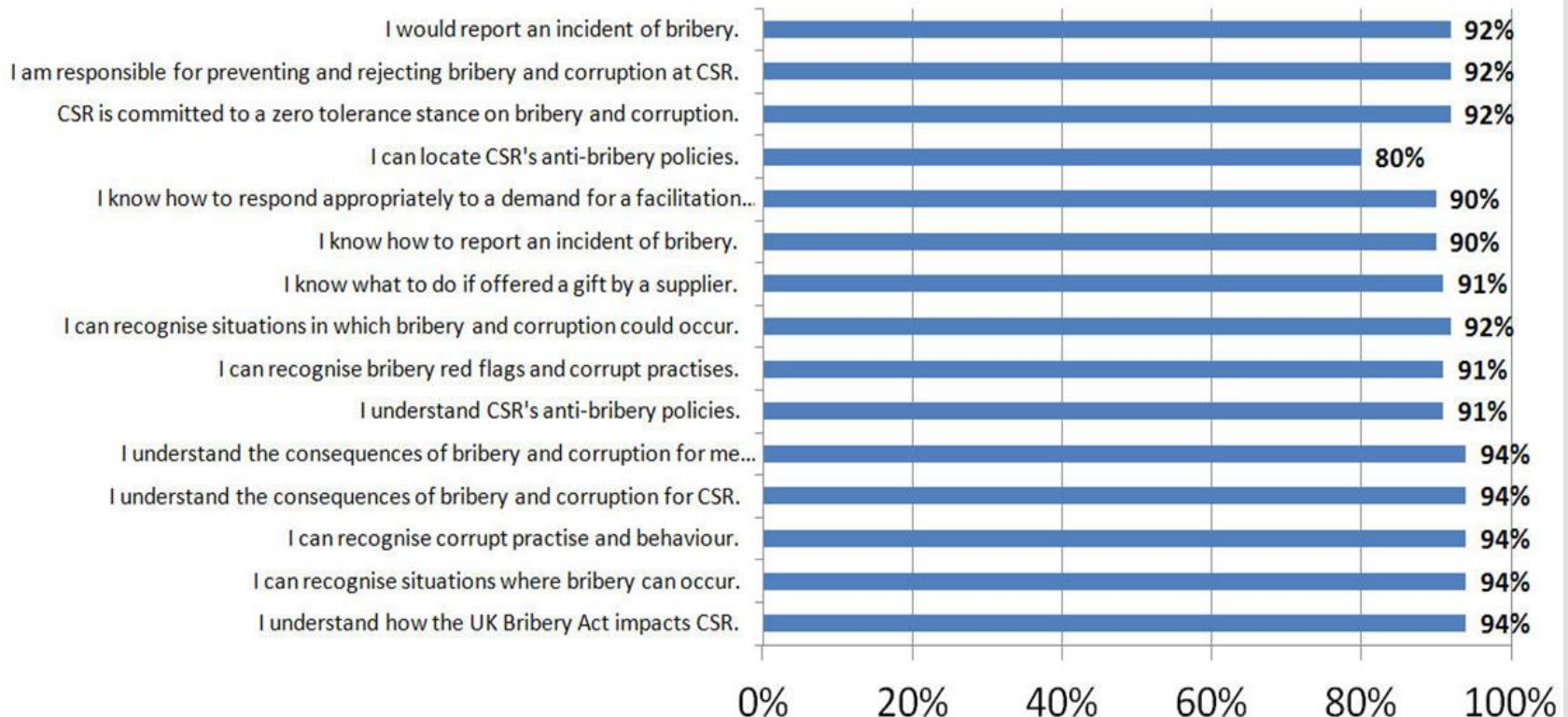
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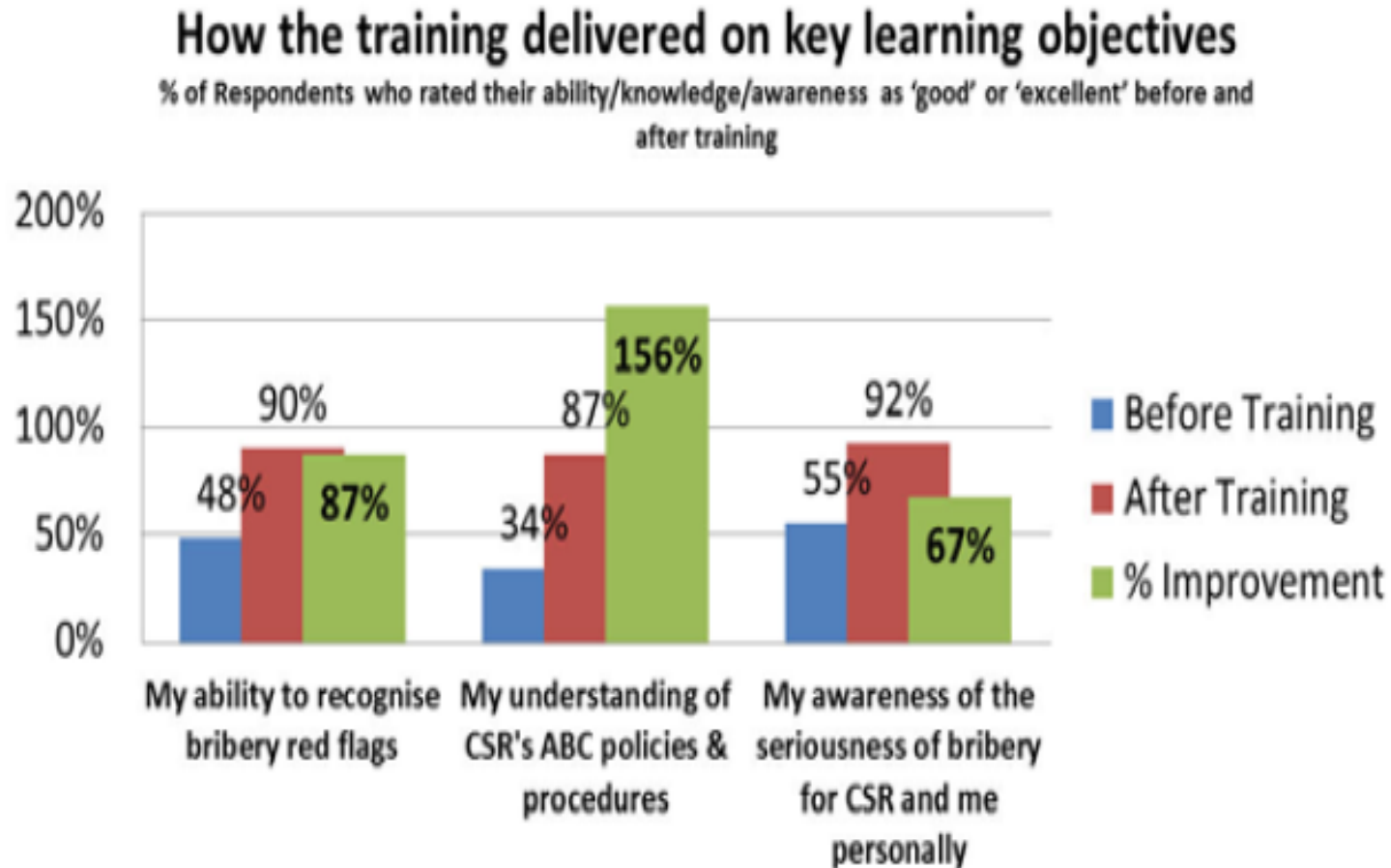
# The Results – Effective for Employees

## Did the Learning Deliver on the Business and Learning Objectives? % of Respondents who Agree or Strongly Agree with the Following Statements





# The Results – Useful for You



# Anti-Corruption Training

**Barney Rosenberg**

Meggitt

VP, Ethics and Business Conduct



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# Meggitt at a Glance

- UK corporation – Revenue \$2 billion
- London Stock Exchange – FTSE 100
- AeroSpace and Energy - Products on everything that flies, including the International Space Station
- 11,000 employees in 20 countries (1/2 w computers)



How Customers; Suppliers; Shareholders; and  
Regulators View Us



# Reputation is Everything



Isaac Newton *Philosophiae Naturalis Principia Mathematica* 1687  
5 years later, in Salem, Mass. 1692, we were hanging innocent people  
as witches



A reputation is a very fragile thing.

It's Ethical...It's not ethical...It's ethical....  
There's a better way to find the answer to Ethics and  
Business Conduct Questions



# Anti-Corruption Training

## Computer based and face-to-face

- All employees receive training on our **Code of Conduct** and **Anti-corruption** policy
- **Printed** Ethics Guide in 7 languages
- **Ethics coordinator** at every location where we have more than 2 people
- **Ethics Line** 24/7 worldwide – toll free
- **List of people** who can help and how to reach them

Our audits have stirred up a demand for face-to-face anti-corruption training



# Training at Meggitt

The screenshot shows a web-based training interface for Meggitt's Code of Conduct. At the top, there is a navigation bar with the Meggitt logo, a search bar, and several utility icons (ABC Check, AutoLink, AutoFill, Options). Below this is a header section with tabs for 'MENU', 'OPTIONS', and 'CODE/POLICY', and an 'EXIT' button. The main content area is titled 'CODE OF CONDUCT' and features a banner with four diverse professionals. Below the banner, the text reads: 'Introduction' followed by a quote from Terry Twigger, Chief Executive of Meggitt PLC, welcoming users to the training. To the right of the text is a video player showing a close-up of Terry Twigger. Below the video player are navigation controls including 'BACK', 'PAGE 1 OF 3', 'NEXT', and 'SLIDE' buttons. At the bottom, a prompt says 'Select "SLIDE" to continue.'

MEGGITT

MENU OPTIONS CODE/POLICY EXIT

CODE OF CONDUCT

BACK PAGE 1 OF 3 NEXT

**Introduction**

**TERRY TWIGGER, CHIEF EXECUTIVE:** Hello, I'm Terry Twigger, Chief Executive of Meggitt PLC. I'm pleased to welcome you to this training and to introduce you to Meggitt's Ethics and Business Conduct Program.

In our industry and in many others, the importance of ethical behavior is at an all-time high. Compliance with the laws and regulations that govern our industry is a critical first step, but more than that, it's expected that we will do the right thing. A good reputation takes years--even decades--to create, but only moments to destroy.

SLIDE SLIDE

Select "SLIDE" to continue.

All of our ethics training is introduced by senior executives



library.midicorp.com/lms/tracking.aspx

Viewing Jason Trippet's desktop

Global Anti-Bribery: ... x

Meggitt PLC WebEx En...

avorites Tools Help

ference - C...

Google

ADP iPay

Aetna Rx

BenefitSolver

CELP

Ethics Program Office

Gmail

ListenUp

Meggitt Credit Card

Meggitt Web email

MEGGITT

MENU

OPTIONS

RESOURCES

EXIT

GLOBAL ANTI-BRIBERY

DOING BUSINESS WITH FOREIGN PUBLIC OFFICIALS

BACK

PAGE 1 OF 5

NEXT

Introduction

TIMES OF THE DAY

Government Minister Denies Corruption Charges

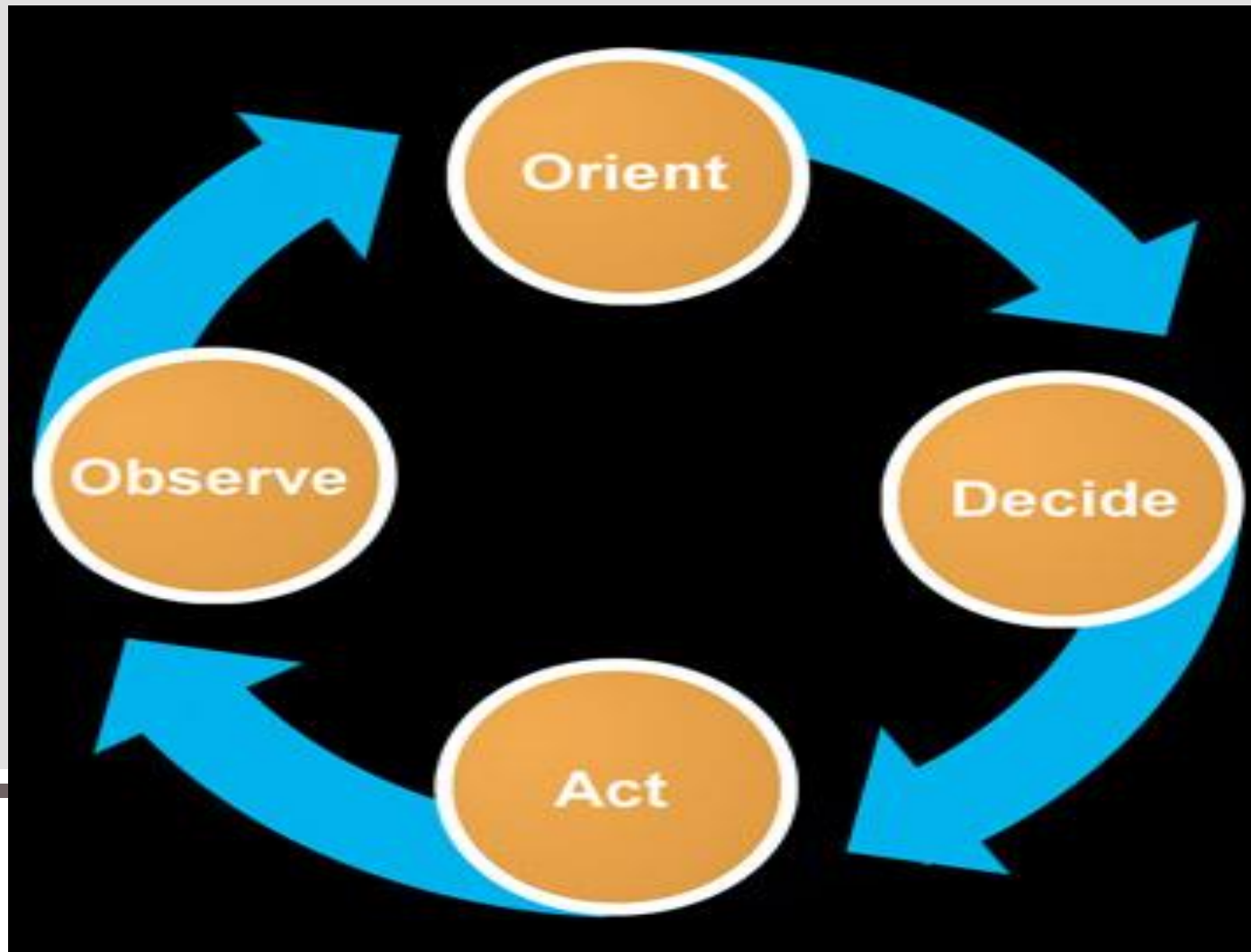
PLAYING

0:18/1:50

Poor Mr. Halstead begins his downward spiral

Scenario based

# OODA Loop



## What else do we do in the era of the UK Bribery Act?

- Internal audit
- Outside audit by NGOs
  - **Ethisphere Institute 2008**
    - Best US Gov't contractor in Europe
  - **Transparency International** – Defence Index 2012, one of only 10 of 129 global companies surveyed receiving highest rating
- On-going international law firm audit

Ethics is what you do when nobody's looking



been supplied and shall not be



# You're not a one "man" band when it comes to Ethics and Compliance



# Anti-Corruption Training That's Effective

**Matt Tanzer**

VP, Chief Compliance and Ethics Officer




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# Anti-Corruption Training That's Effective

## Senior Leaders Set the Tone



A message from **George Oliver**  
Chief Executive Officer

11 March, 2013



**Vital Values Week 2013**

*Translations of this message can be found on the Tyco Yammer Network*  
<https://www.yammer.com/tyco.com/notes/618604>

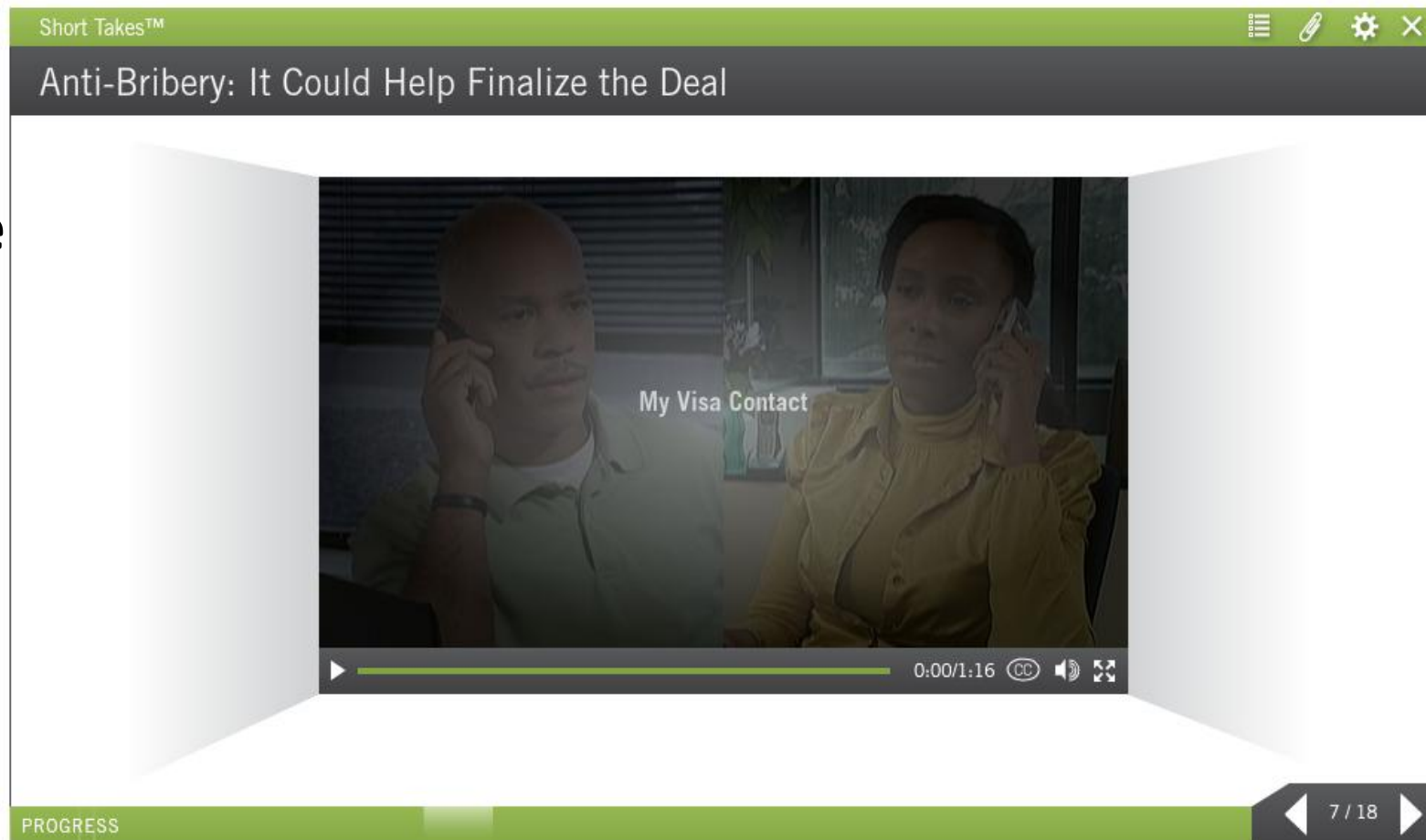
Dear Colleagues,

As the CEO of Tyco, I'm personally committed to ensuring that we bring awareness of our values to all employees around the company. In the new Tyco, these values remain strong and absolutely critical to the way we do business.



# Anti-Corruption Training That's Effective

**Shorter  
And More  
Interactive  
Online  
Training  
Works  
Better**



# Anti-Corruption Training That's Effective

## In-Person Training is Critical

- Gaming Tools Keep Attention High
- Simultaneous Interpretation Needed
- Substantial Time and Money Commitment



# Anti-Corruption Training That's Effective

## Latin America Training: Feb/Mar 2013

### Topics covered:

- Ethical Leadership
- Fair Competition
- Anti-Bribery
- Conflicts of Interest, Gifts and Entertainment

**More than 900 Finance, Sales, Controllers, HR And Other Managers Trained**

Country	Location	Attendees
Argentina	Buenos Aires	121
	Cordoba	32
	Mendoza	25
Brazil	Sao Paulo	94
Chile	Antofagasta	18
	Concepcion	14
	Santiago	189
Columbia	Bogota	51
Costa Rica	San Jose	89
Mexico	Guadalajara	15
	Mexico City	209
	Monterrey	29
Uruguay	Montevideo	29
Grand Total		915

# Anti-Corruption Training That's Effective

## Ethical Reflections: Manager-Led Training

- Highly Effective
- 14 Languages
- >40 Scenarios
- 8 Topic Areas
- 2-4 New Scenarios Per Quarter
- Each Scenario Has Facilitator Talking Points, FAQs, Links To Policies And Other Useful Information

The screenshot shows the website for the Vital Values Ethical Reflections Toolkit. At the top, there is a language selection bar with options: [English] | [Čeština] | [Nederlands] | [Italiano] | [Español (Latinoamérica)] | [Deutsch] | [Français] | [简体中文] | [한국어] | [日本語] | [Português - Brasil] | [中文 - 繁體]. Below this is a header image with the toolkit logo on the left, which includes the text 'Vital Values Ethical Reflections Toolkit' and 'vital values every one, every day'. On the right of the header is a blue banner with a 'Click here for' button and a 'GEC Resources' link. The main content area has a blue background and contains the following text:

**Welcome to the Vital Values Ethical Reflections Program**

Ethical Reflections is an ethics and compliance program which provides managers with an easy scenario-based toolkit to facilitate ethics-based discussions with their employees.

To use the toolkit please follow the steps below:

1. Select a subject area listed below that is meaningful to your audience.
2. Choose a scenario from that topic.
3. Review the materials and conduct the session.
4. Return to this site and select "Training Validation" to confirm you completed your session.

Below this is a section titled 'Case Studies' with a list of eight topics, each preceded by a small icon:

- Conflicts of Interest
- Doing Business with Integrity
- Financial Integrity — **NEW**
- Gifts and Business Entertainment
- Political Activities and Charitable Contributions
- Promoting a Positive Workplace and Respecting Others
- Protecting and Managing Company Records
- Protecting Employees and the Environment: Zero Harm

# Anti-Corruption Training That's Effective

## Yammer Online Community



**Marty Morehouse** ▶ **Vital Values Week 2013**



Very innovative crack the code game. Thanks.



### Crack the Code Interactive Game

Posted in Vital Values Week 2013 ▶ Notes

\*English \*Spanish LA \*German \*Spanish EU \*Chinese Simplified \*French \*Dutch \*Czech \*Italian \*Portuguese Brazil \*Korean

Like · Reply · Share · More · April 4 at 7:40am

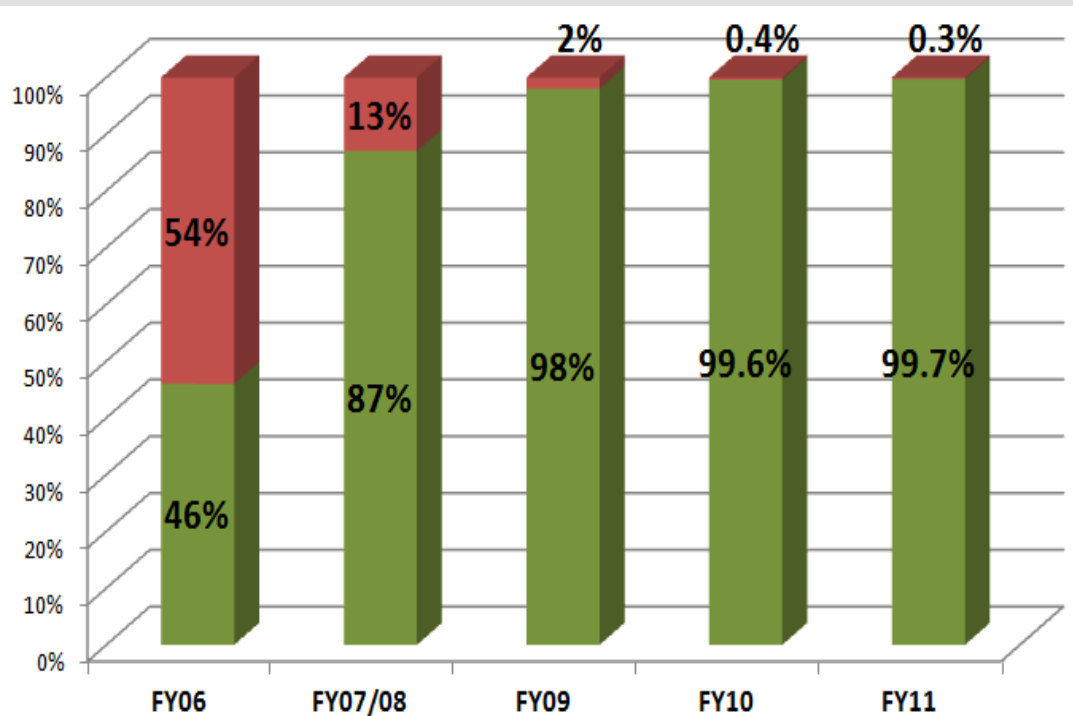
👍 Liked by Emily McKinley and Steve Goldman.



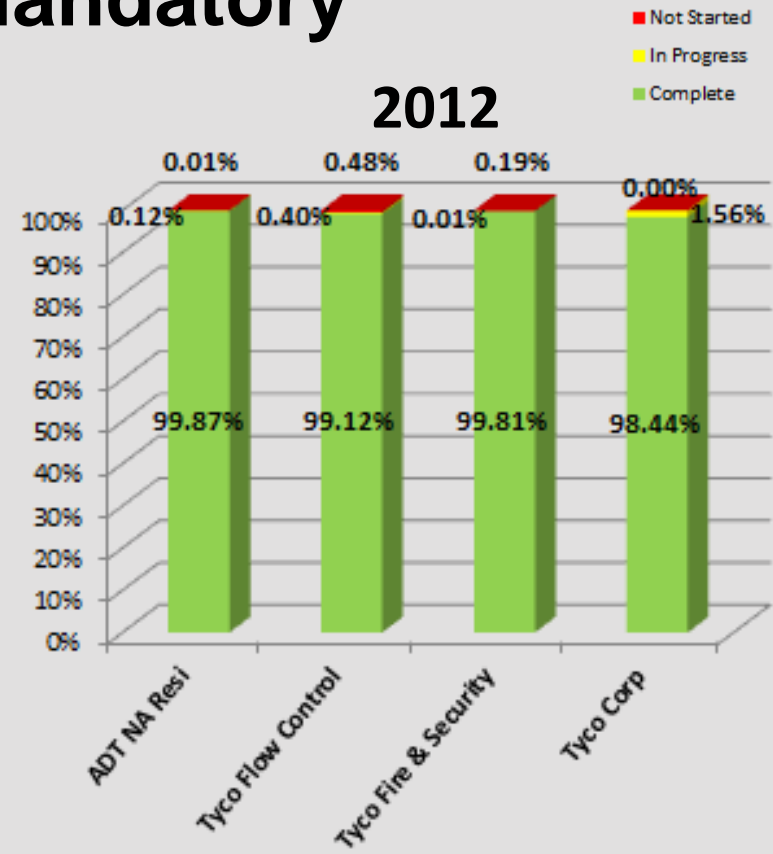
# Anti-Corruption Training That's Effective

## Measurements Mandatory

2006 – 2011



2012

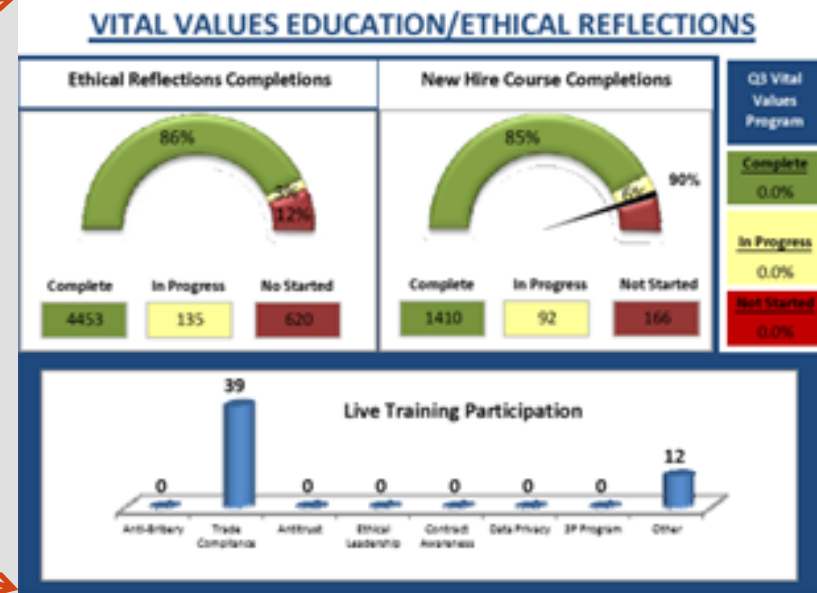
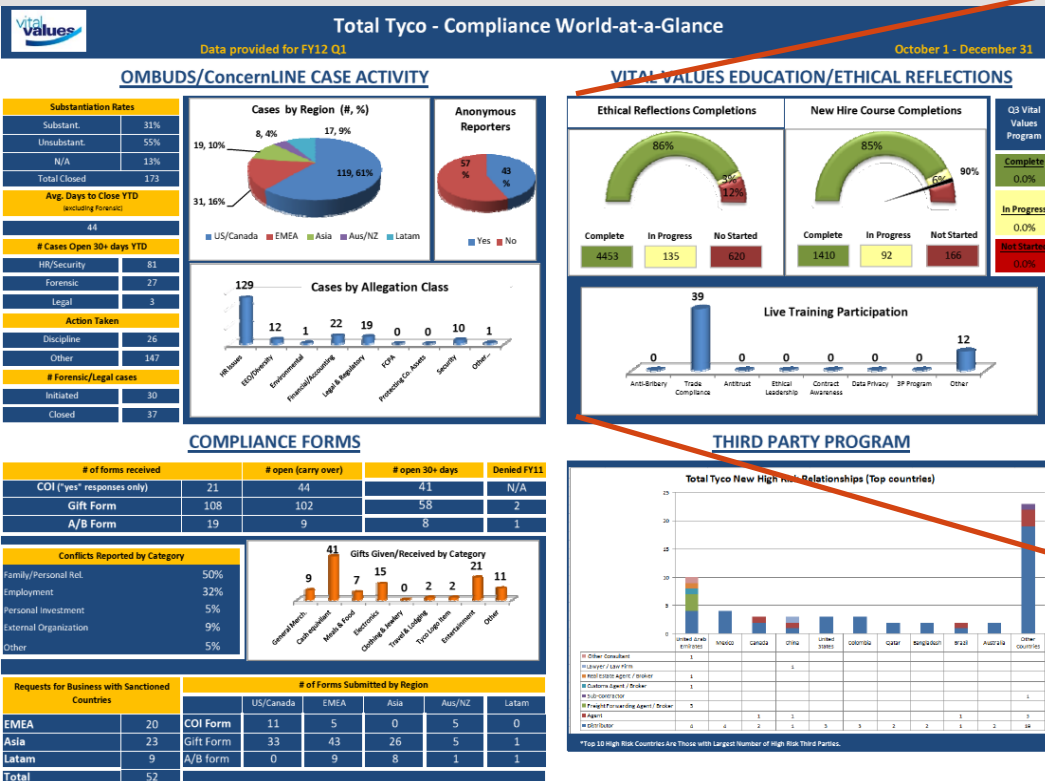


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# Anti-Corruption Training That's Effective

## Communicate Measurements Internally



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