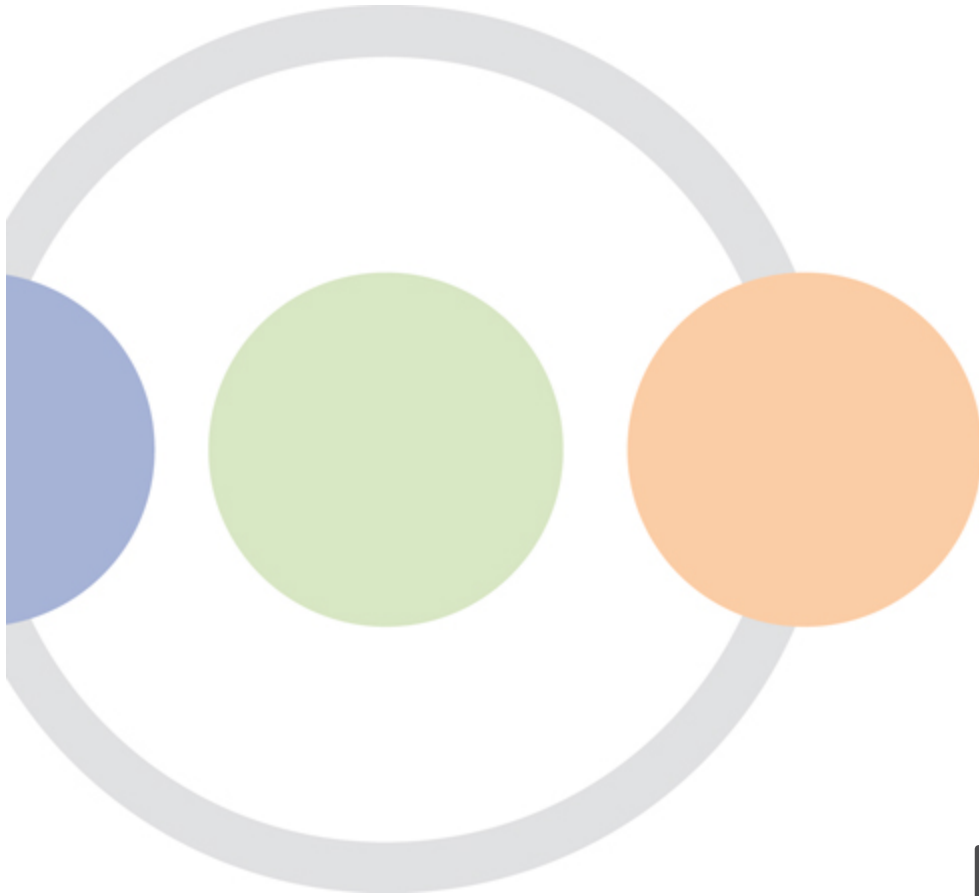# Globalizing Your Code of Conduct

Michelle Nichols, Manager, Program Consulting - The Network

Dan DeMeritt, Director of Business Conduct - ITT

Carlos A. Garcia, Compliance Counsel Americas - TE Connectivity

THE Network
Integrated GRC Solutions

TE connectivity

ITT

Michelle Nichols

**Manager, Program Consulting
The Network**

THE **Network**
Integrated GRC Solutions

Code Socialization and Training

- **Begin with the end in mind….**

  – How will employees **access** the Code?

  – How do you want employees to **use** the Code?

  – How will you **engage** employees to regularly access the Code?

  – How will you **train** and maintain awareness regarding the Code?

  – How will you **measure** the effectiveness of the Code?

Accessing the Code

- How does your workforce access information – on and off the job?

    - Connected (office workers)

    - Mobile (executives, sales)

    - Offline (non-office workers)

    - Disconnected (no internet access, low bandwidth)

- Tailor content to accessibility and audience

- Mobile accessibility is a must-have

- What shouldn't be mobile accessible?

Using the Code

- Most employees don't actually **"read"** the code

- They **skim the headings** looking for an area of interest

- They stop at **bulleted lists**, bold or other **stylized fonts**, and call out boxes

- They search for **keywords**

- They try to locate additional **people resources** who can answer questions
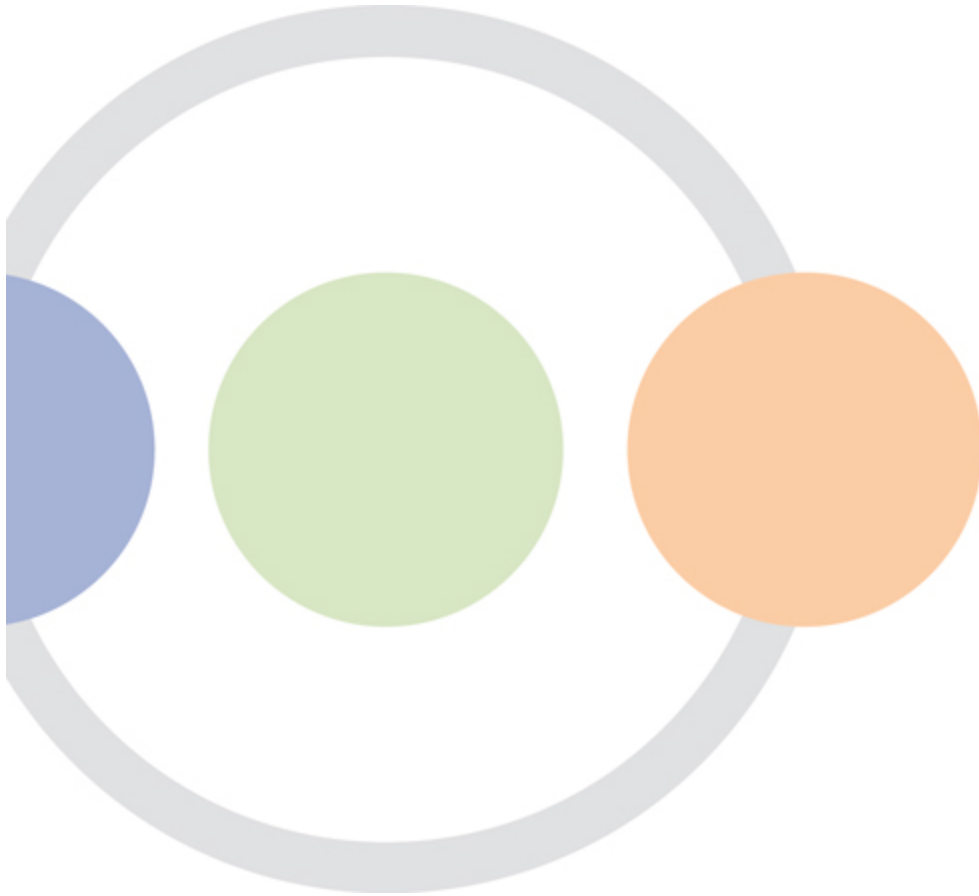
Training on the Code

- While engaged in the process of rewriting and / or rebranding your Code, start by examining your current Code training:

  - Does it "match" the look and feel of the new Code?

  - Are the messages still in sync?

  - Evaluate opportunities to add a video of your CEO to your training that addresses the new Code

- "Next Generation" of the Code will be apps and training will follow suit

  - Lines between Code, training and communications will be blurred

Evaluating the Code

- Determine how you will evaluate the effectiveness of your code before starting to write it.

- Options for effectiveness evaluation:

  – More questions generated to management or your help desk

  – Employee surveys conducted prior to launching the code (benchmark) and after the launch to measure changes

  – Adding code topics to internal audits

- If you have a true web Code (not a pdf), you can measure:

  – Pages viewed

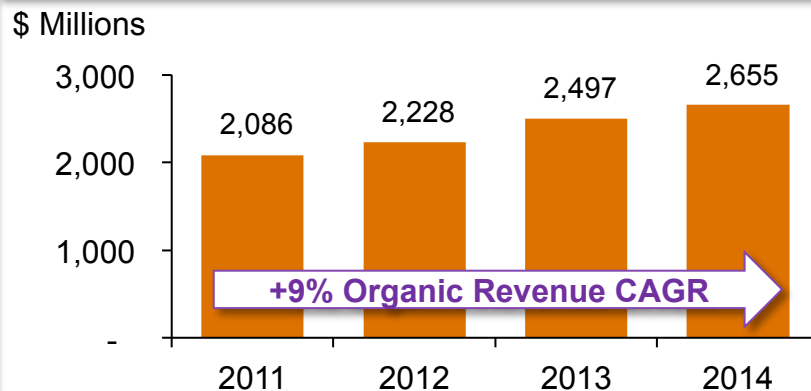 – Time on page

  – Top searched key words

Dan DeMeritt

**Director Business Conduct
ITT**

ITT – Engineered for Growth

Revenues

$ Millions

- 2011: 2,086
- 2012: 2,228
- 2013: 2,497
- 2014: 2,655

+9% Organic Revenue CAGR

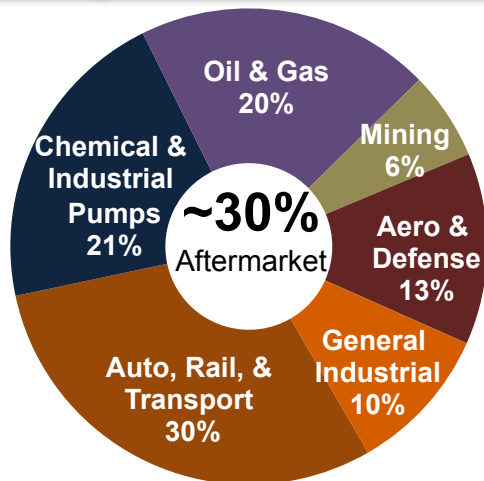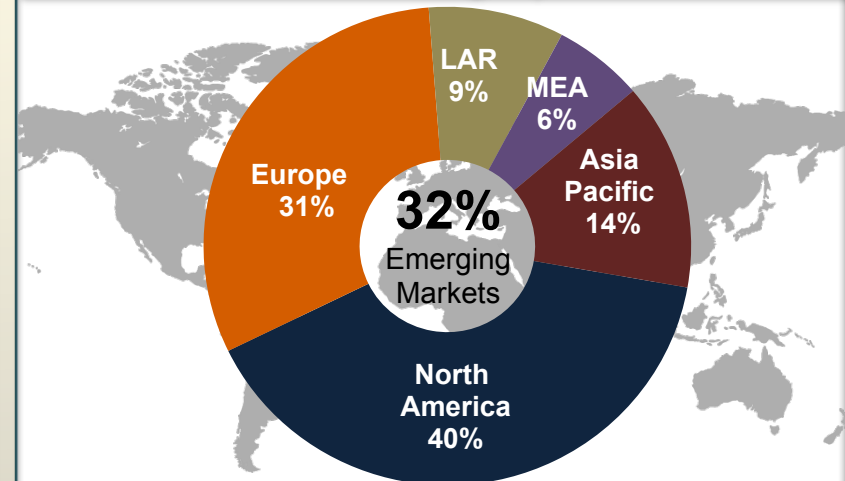## Highlights

- Leading Manufacturer of Highly Engineered, Critical Components and Customized Technology Solutions for the Energy, Transportation and Industrial Markets

- Well Aligned Portfolio with Attractive End-Markets & Long-Term Macro Trends
  - Automotive
  - Chemical
  - Aerospace
  - Oil & Gas

Strong Growth End Markets

~30% Aftermarket

- Oil & Gas 20%
- Mining 6%
- Aero & Defense 13%
- General Industrial 10%
- Auto, Rail, & Transport 30%
- Chemical & Industrial Pumps 21%

Balanced Geographic Mix

32% Emerging Markets

- LAR 9%
- MEA 6%
- Asia Pacific 14%
- North America 40%
- Europe 31%

2014 Data

Strong Foundation for Growth

Globalizing ITT's Code of Conduct

Discovery

- **Presentations**
- **Interviews**
- **Surveys**
- **Communications**

Globalized Code of Conduct

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Globalizing ITT's Code of Conduct

Discovery

- **Presentations**
- **Interviews**
- **Surveys**
- **Communications**

Globalized Code of Conduct

Culture

- **Aspirations**
- **Words**
- **Opportunities**
- **Successes**

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Globalizing ITT's Code of Conduct

Discovery
- **Presentations**
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- **Communications**

Globalized Code of Conduct

Culture
- **Aspirations**
- **Words**
- **Opportunities**
- **Successes**

Extended Team
- **Levels**
- **Functions**
- **Purpose**
- **Globalization**

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AWARENESS

Movie Trailer

Travel

Ethics Champions

Leadership Communications

ITT

Carlos A. Garcia

Compliance Counsel Americas
TE Connectivity

GLOBALIZING YOUR CODE OF CONDUCT

TRANSPORTATION Solutions

NETWORK Solutions

INDUSTRIAL Solutions

CONSUMER Solutions

GUIDE TO ETHICAL CONDUCT CERTIFICATION RATE

99%+

TOTAL EMPLOYEES
83,000

AMERICAS
38

EMEA
29

Manufacturing

CHINA
15

LANGUAGES
25

MANUFACTURING EMPLOYEES
53,000

ASIA
8

Source: http://investors.te.com/files/doc_financials/TEL_2014AnnualReport.pdf

GLOBALIZING YOUR CODE OF CONDUCT

DELIVERING THE MESSAGE

Content

- Employee Guide
- Managers Guide
- Considers industry trends
- Considers cultural differences

Connecting with Our Values
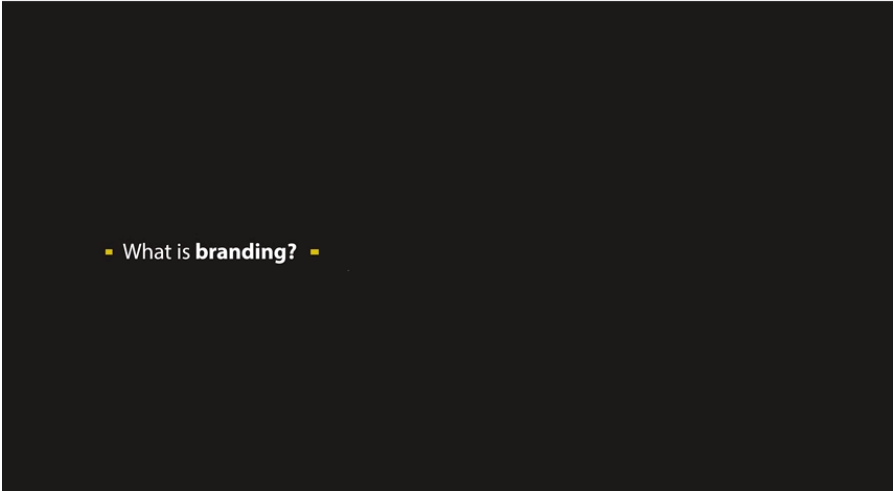TE CONNECTIVITY GUIDE TO ETHICAL CONDUCT

Basic Guide Elements

- Website availability
- Abridged version
- Color
- Company values
- Ethical Decision Guide
- Glossary
- Graphics
- Index
- Interactivity/Links
- Letter from CEO

Format

- Printed copies
- Dedicated Intranet site
- Corporate webpage
- Kiosk
- Mobile app

GLOBALIZING YOUR CODE OF CONDUCT

FOOD FOR THOUGHT

- What´s your on-line/off-line code communication mix?
- What other communications tools you have?
- Are you "branding" your program?
- What is motivating your employees to read the code?