

Weaving a Culture of Ethics & Compliance into the Business

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INTRODUCTIONS



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The views and opinions we express are our own as individuals and not necessarily those of our respective employers



OBJECTIVES

Audience Survey & Reflection

Building Effective Partnerships

Building & Integrating Cultures

Measuring Success

Wrap-Up & Reflection

AUDIENCE SURVEY



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“THE BUSINESS” DISCLAIMER

What is “The Business”?

For this session, we will use **‘the business’** as a collective term for convenience, understanding that functions – and the people who lead and work in those functions – are unique!



INTRO REFLECTIONS

- Think of a few people who have helped to embed compliance/ethics within your organization
 - What behaviors do they display?
 - Did these relationships evolve over time?
- Think of a few people who have resisted compliance/ethics activities or initiatives
 - What behaviors do they display?
 - Are there opportunities for these relationships to evolve over time?
- Are there any business teams or colleagues where your touch points are rare or non-existent?
 - Is that okay or is there value in having more touch points with those who are “off the grid”?



“

**The most important thing in
communication is hearing
what isn't said.**

PETER DRUCKER

UNDERSTANDING THE BUSINESS IS **NOT**:

- A gimmick or trick to further an agenda
- A way to make it *look* like you care
- Just “speaking the language”:



Excerpt from “*Stuff Business People Say*”, Avaya

([YouTube Link](#))

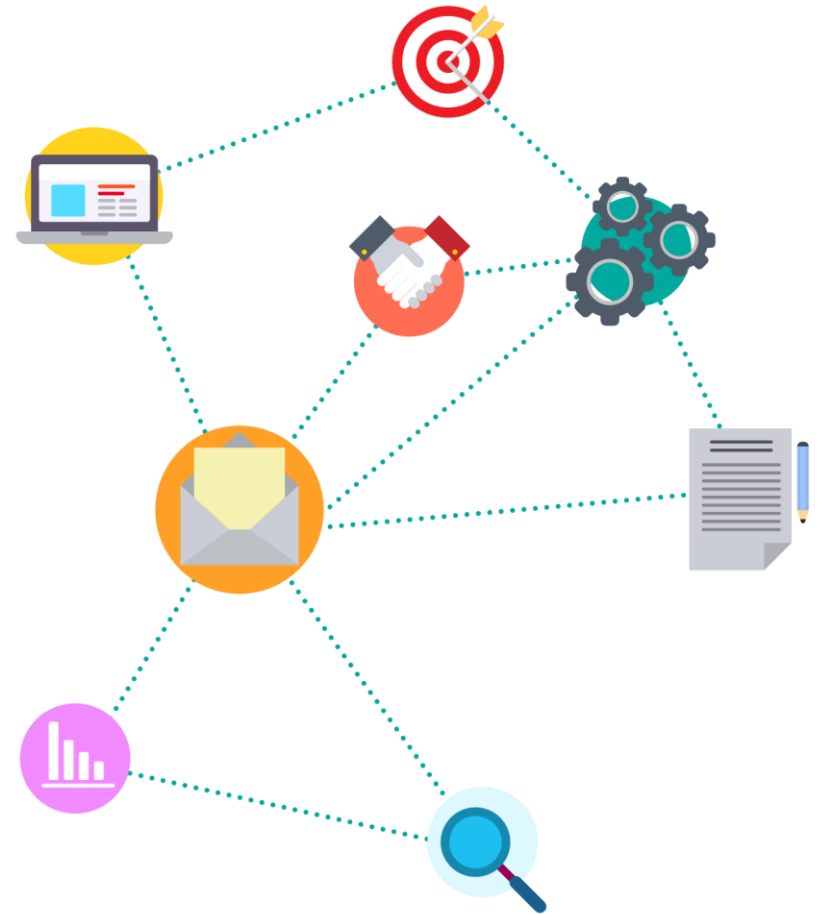
TRULY UNDERSTANDING 'THE BUSINESS'

- Begin with understanding your business partners':

- Goals
- Challenges and pain points
- Picture of what success looks like
- Budget cycle/pressures
- Assumptions (about compliance and in general)

- Unique aspects of each business:

- Product mix
- Competition
- Patient population(s)
- Payors
- Therapeutic area challenges



WEAVING A CULTURE OF E&C THROUGH GENUINE RELATIONSHIPS

- Build relationships with *obvious* business teams and leaders in:
 - Commercial (Sales, Marketing, Market Access, etc.)
 - Medical Affairs
 - Legal
- Don't forget about relationships with those that may *not* be obvious:
 - Finance
 - IT
 - HR
 - Communications/Public Relations
 - Government Affairs
 - Procurement
 - Clinical/R&D
 - Patient Advocacy
- Ensure your “value-adds” meet or exceed your “asks”



“

**The single biggest problem in
communication is the illusion
that it has taken place.**

GEORGE BERNARD SHAW

COMMUNICATION, CULTURE, TRUST

- Communication between Compliance and business teams should:
 - Be objective and authentic
 - Allow for communication and feedback to flow both ways
 - Allow for true insight into the organization's activities
- Building Culture
 - Listen to, partner with, and play a part!
 - Compliance officer is a team member of an organization, not a police officer
- Building Trust
 - Requires creating an environment where people are comfortable speaking up generally on a wide range of topics



“

**I've learned that people will
forget what you said, people
will forget what you did, but
people will never forget how
you made them feel**

MAYA ANGELOU

Creating Psychological Safety at Work

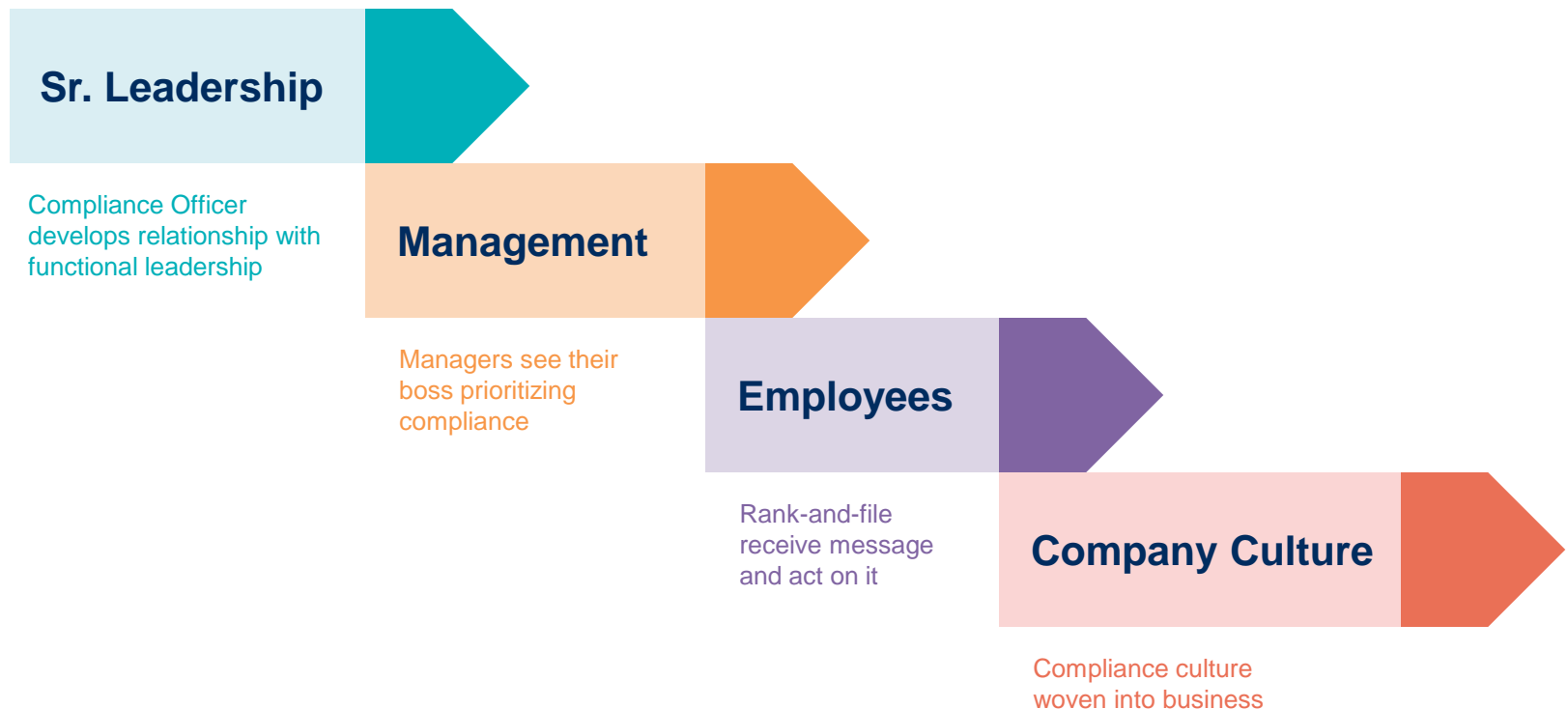
Amy Edmondson, Ph.D. | Harvard Business School

Excerpt from “*creating Psychological Safety at Work in a Knowledge Economy*”, Amy Edmondson

([YouTube Link](#))

WEAVING CULTURE THROUGH GENUINE RELATIONSHIPS

- Genuine relationships build trust – **trust builds credibility**:
 - Cascades within a function
 - Spreads through the organization



“

**Often, good controversy
allows people to figure out
what they actually believe
together**

PRIYA PARKER

REACHING “ANTI-COMPLIANCE” AND SKEPTICS

- Foster a mutually-beneficial environment between the business and Compliance, rather than adversarial
 - Understand the background and the problem the team is trying to solve
 - Seek to align goals and reduce shared risks
 - Create alliances instead of rivalries
- Communicate how a culture of compliance can help achieve their objectives
 - Improves efficiency (when done correctly)
 - Standardizes processes
- Seek out and encourage engagement
 - Don't confuse debate with anti-compliance
 - Debate is often an attempt to solve a problem
 - Anti-compliance opinions should be aired to address concerns and root causes



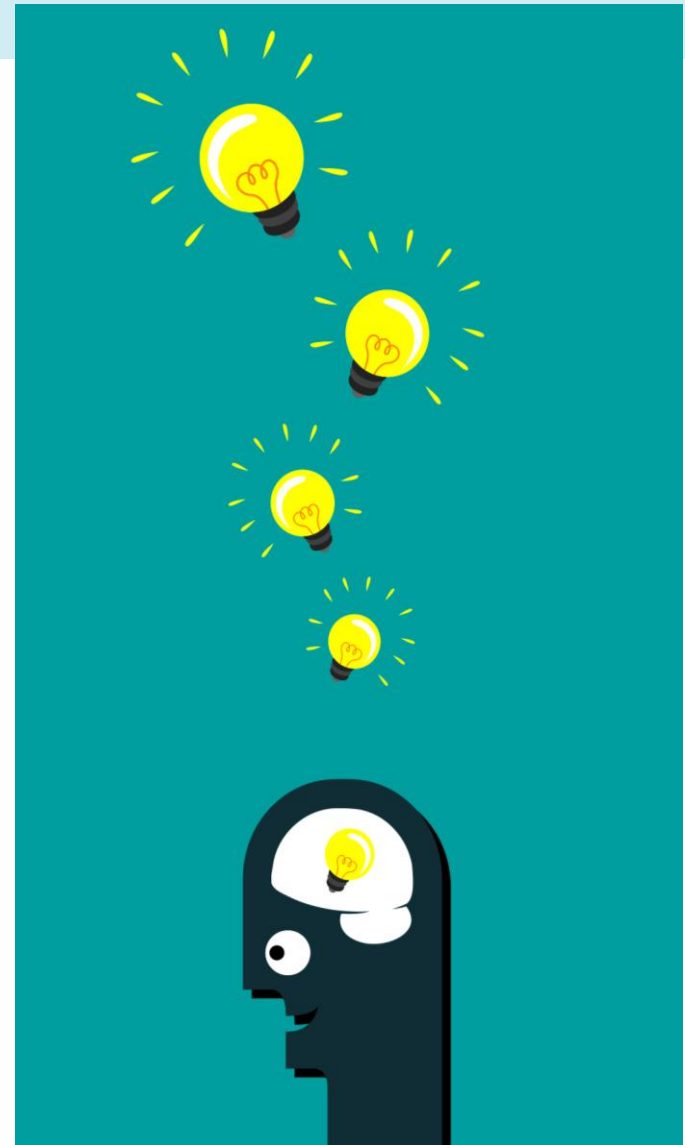
BUILDING A CULTURE OF COMPLIANCE



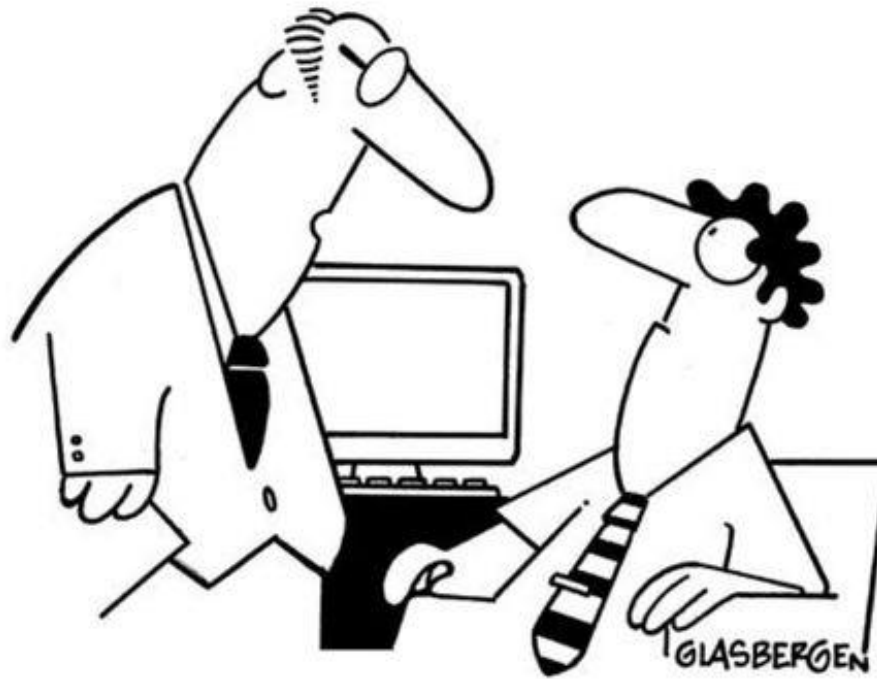
- How to develop culture within a new organization or Compliance group?
 - What are the drivers?
 - What is the strategy?
 - What is risk tolerance?
 - Develop touchpoints
- Enlist leadership to set a tone of compliance with mission, values reminders, and actions
- Survey and engage employees
 - Find out what is working...or not working
- Set and communicate clear expectations

KEY CONSIDERATIONS IN M&A

- How to merge two compliance cultures post M&A?
- Merging standards and attitudes
- CIA to non-CIA transition
- Survey employees
 - Gauge prior compliance culture
 - Look for opportunities for positive change



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"I'd like you to do a presentation on business ethics. If you don't have time to prepare something, just steal it off the Internet."

**Source: the Internet
(www.glasbergen.com)**

WEAVING ETHICS INTO A CULTURE OF COMPLIANCE

- Compliance:
 - Adhering to laws, codes, regulations, and policy
- Ethics:
 - Doing what is right based on moral and philosophical values
- Ethics vs. Compliance
 - Often used synonymously or without differentiation
 - How are they different?
 - How are they similar?
- How do we balance ***what we must do*** with ***what we should do***?



MEASURING SUCCESS

- Measurable vs. Meaningful?
 - Not mutually exclusive
- Sample opinion across functions, roles and leadership
- Compare tangible results in regular intervals:
 - Hotline statistics
 - Policy violations
 - Training scores
 - Internal audit findings
 - Survey results



Metric	Increasing	Decreasing
Hotline Statistics	May indicate better hotline awareness or speak-up culture OR more potential violations are occurring or identified	May indicate less violations are occurring OR less reporting is occurring

- Maintain key relationships and develop new relationships

WRAP-UP REFLECTIONS

- What are the biggest challenges or concerns facing your organization?
- Who are the key functions and individuals that you need to help embed a culture of compliance and ethics?
- What have you found helpful for building effective relationships?
- What *isn't* being said and are there opportunities to engage more directly on any issues or topics?



KAHOOT SURVEY



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Thank You!