Suggestions for Final User

1. Compliance Programs Elements - Review slide deck Communicating the Value of High-Standard Business Ethics (within a company) - Challenges and Opportunities (items 1-6 in Column Compliance Program Elements)
2. Ideas and Examples – for reference and idea generation
3. Outcomes - Consider Proposed outcomes and what system (financial, human resources, other) are already in place.
4. Measure - Can system or other data be used to measure the Compliance Program Element
5. Materials – additional resources to support

Compliance Program Elements	Idea	Examples	Outcome	Measure	Materials
Introduction	Starting the Conversation	Leadership Embracing Ethics (tone at the top and middle)	Company success and employee satisfaction	Performance and retention	PPT slide deck – Communicating the Value of Ethics Programs
	Ethics Drives Employee Engagement	Employees' perceptions of company ethics impact their overall engagement.	Engaged employees reduce ethics risk: they are more likely to react to misconduct by reporting their observations National Business Ethics Survey: Ethics and Employee Engagement Ethics Resource Center (ERC) with the Hay Group, 2010	Reduced employee turnover	<<ppt slides on Data for Ethical Performance>>
1. Written standards of ethical workplace conduct	A Code is a written standard of ethical business conduct.	Consider how the Code applies to each job function and provide clear, practical standards. Signposts to further support,			<<i.e. a template for a code>>

		advice and other relevant policies should also be provided.			
2. Training on standards	Empower an Ethics Officer (who should be a business partner, not just an enforcer) and/or Managers to provide ethics training to new employees and provide regular (at least annual) refresher courses. Communication and Awareness Programs – communication of a company's ethics policy never ends.	Don't just tick the box with online training – there is no substitute for face-to-face training. Discussion of real and hypothetical ethical scenarios better enable employees to understand a company's code of ethics and explore how they would/should respond. Expand communication/expectations to third party agents, such as distributors, PR agencies, etc.		Training Completion in a timely manner Retention of training topics – 3m or 6 m to refresh on key points and capture retention and "real-life questions"	
3. Advice 4. Reporting Company resources that provide advice on ethics issues	A key component of these arrangements is that staff feel comfortable to raise issues without fear of retribution.	Establish procedures for employees, contractors and third parties to confidentially and/or anonymously raise potential ethics violations. Enlightened companies are transparent about the	Is there a channel for reporting complaints in your company? Is this channel communicated to all employees? Suggest annually?	Share de-identified problems and resolutions across your originations Track problem	"Companies that invest in ethics reap an enormous return," ECI CEO Patricia Harned said. "Better workplace ethics

		number and nature of issues raised and the disciplinary actions taken when wrongdoing occurs.		resolution year on year and share	cuts business risks by reducing the chance that serious ethics problems will throw companies off course and distract them from their core business."
	Critical that employees see that potential violations are taken seriously and that there are appropriate consequences. Listen up and speak up culture.		Are new employees trained on this channel? Are managers trained on how to receive potential complaints? Does your company share the number and nature of complaints received? Share internally? Externally? What if no complaints are received (in a year)?	Use free online survey tools to measure employee "psychological safety" to speak up	Source: A Research Report from the National Business Ethics Survey® (NBES®)
5. Performance evaluations of ethical conduct	Create and drive an ethical culture	Promote ethical conduct through performance goals. Ethics needs to be brought up regularly so that it stays at the top of employee's minds. See the bigger picture – the livelihood of the company is at stake.	According to Cindy Schipani from University of Michigan, to know whether your company's environment fosters ethical behaviour. Do your company's incentives match its policies? Do colleagues feel the need to change who they are when they are at work? Are promotions offered exclusively to colleagues demonstrating ethical	a strong consistent leadership landscape an environment where the pressure on results and space for development are well balanced a system including processes and symbols	Studies have shown that companies that work to build and maintain ethical workplace cultures are more financially successful and have more motivated, productive employees.1

			behaviours? How much the upper management will lead by example? Does the company cover for employees in ethical lapses?	reinforcing the best practices (e.g.: reward and recognition, performance management, ethical decision framework, ethical questions being part of the normal course of the business conversations) an individual's commitment to the company's values and culture	
6. Systems to incentivize ethical conduct and discipline violations	Virtuous circle – When companies value ethical performance, misconduct is substantially lower.	The real litmus test of whether an ethics policy is working and embedded is if an employee feels comfortable enough to speak up if she or he has a concern and whether he or she believes the company will respond and, if need be, take appropriate action. Once an ethics policy is successfully implemented in a company, be sure to take			

		into account and consider your potential liability for your wider supply chain/third party agents. As your agents, you are responsible for their actions.			

1. For example, Workplaces with a high-trust culture have a competitive advantage in the marketplace. Publicly-traded companies on the 100 Best Companies to Work For® list deliver stock market returns 3 times greater than market average, according to the Great Place to Work Institute (https://www.greatplacetowork.com/business-case-poll, accessed 26 June 2018)