

MINI SUMMIT XI: ADVANCED STRATEGIES IN COMPLIANCE TRAINING

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Ground rules

- Please feel free to share your experience in broad terms – keeping in mind not to share commercial or company sensitive information

Why training is important?

1) Companies need to ensure employees are aware of the rules and understand them → « **apply compliance** » vs « **tick the box** »

2) One of the most important elements of a robust compliance program is **training**¹ → key lever for **reducing compliance risk**

- Some arguments to justify DOJ & SEC have declined to pursue some companies are:
 - “improvement of the training compliance program”
 - “in addition to the immediate training at the relevant subsidiary, the company provided comprehensive FCPA training to ALL of its employees”
 - “the company instituted improved training”

¹ A Resource Guide to the U.S. FCPA
<http://www.justice.gov/criminal/fraud/fcpa/guidance/guide.pdf>

Strategic points to consider

- **Tone at the top**
 - How to introduce it in training
 - Which effect on training effectiveness



- **Ownership for training**
 - Compliance of course!
 - No, it should be the subject matter expert
 - And what about HR/learning department?



- **Scope: Global/Regional/Local**
 - Language management

Strategic points to consider

- **On-boarding for new employees/
new position**

- Role of different functions, such as HR
- Global/local
- Training platform

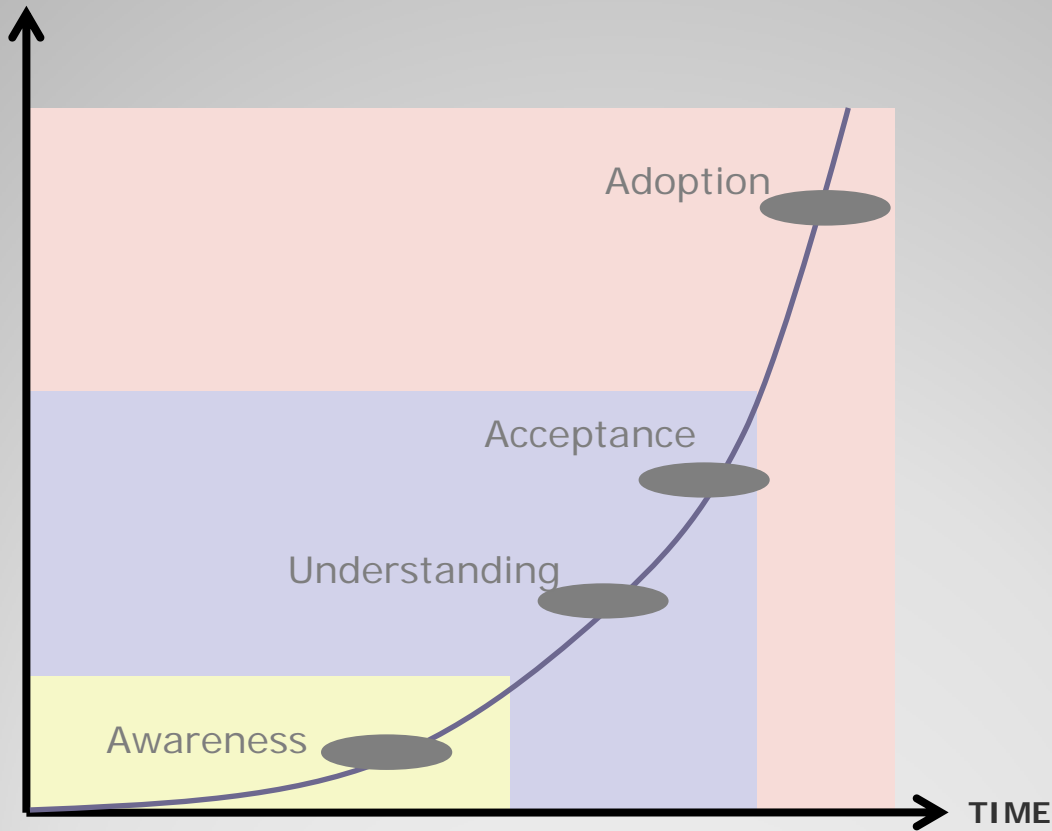
- **Reporting**

- e-learning and face/face
- Third-parties training
- How to answer in few minutes to a DOJ request



The learning curve: targeting effectiveness

LEARNING



experience

training

communication

TIME

Why awareness is also important?

- Why
 - To reinforce a culture of compliance & encourage effective questioning
 - To vary ways of instilling compliance behavior
 - As a reminder of previous training
 - To keep a level of « sensitivity » on certain topics

• Examples

- Compliance day
- Videos campaign
- Newsletter
- Intranet



Conclusion

Training is essential to instill a culture of the « should » versus the « can »¹, to help employees:

- do the right thing,
- at the right time,
- and for the right reason.



¹ The difference is what we « can » do legally as opposed to what we « should » do ethically