

How to Communicate and Collaborate with Colleagues in Related Functions and Departments

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Disclaimer

The statements made by the presenters during this session represent their individual views and should not be construed to represent the views of their respective organizations.

To Whom We Communicate

- **CEO and Board**
- **Audit Committee**
- **Compliance Committee**
- **Senior Management**
- **Regional/Business Unit Compliance Colleagues**
- **Business Unit Leaders**
- **Commercial Operations**
- **R&D/Medical Affairs**
- **Employees**
- **Legal**
- **Finance**
- **Internal Audit**
- **Human Resources**
- **EHS**
- **Security/Site Services**
- **JV/Co-promotion Partners**
- **External Parties**
 - **Vendors**
 - **HCP Consultants**
 - **Government Agencies**

Why Communicate and Collaborate

- **Build trust**
- **Create opportunity for dialogue**
- **Create awareness**
- **Build consensus**
- **Ensure high level of engagement**
- **Encourage ownership & accountability**
- **Establish shared responsibility**
- **Educate**

What We Communicate

- **Code of Conduct**
- **Policies, procedures and processes**
- **Availability of reporting mechanisms**
- **Compliance risks and responsive strategies**
- **Training and refreshers**
- **Legal, regulatory & compliance updates**
- **Real life examples from investigations, audits and monitoring**
- **Surveys**

How We Communicate and Collaborate

- **Reports to Board Committees and Senior Management**
- **Compliance risk assessment**
- **Investigation/Monitoring reports and trend analysis**
- **Attendance at internal meetings**
- **Cross-disciplinary project teams**
- **Consensus meetings**
- **Training and FAQs**
- **Mass mailers**
- **Awareness campaigns (posters, tri-folds, etc.)**
- **Outside conferences/Professional development**

Communication and Collaboration:

A Practical Example – U.S. Project

- **Legal and Regulatory Risk Assessment**
- **Internal Resources**
 - Compliance
 - Legal
 - Finance
 - Regulatory
- **External Resources, Investigations/Auditing**
- **Develop Risk Register**
 - Likelihood/Impact Ranking
 - Evaluate Effectiveness of Controls
- **Develop Annual Monitoring/Auditing Plan**
- **Review with U.S. Compliance Committee**

Communication and Collaboration:

A Practical Example – Global Project

Code of Conduct Revision

- **Bi-annual publication of Code**
- **Engage cross-functional team**
 - Legal
 - Compliance
 - Business
- **Obtain internal/external perspectives**
- **Engage subject matter experts**
 - Internal reviewers
 - Internal logistics
 - External vendors
- **Revise Code accordingly**
- **Circulate for internal review and approval**
- **Present draft for Board comment**
- **Begin preparing training**
- **Final draft to Board for approval**
- **Upon approval, U.S. distribution and training begins**
- **International**
 - Code translated: 21 languages
 - Internal reviewers validate translations
 - Code distribution
 - Electronic – translated
 - Hard copy – English only
- **Training**
 - e-Learning system
 - Manager-led

Results of Poor Communication and Collaboration

- **Lack of trust**
- **Lack of knowledge and engagement**
- **Lack of accountability**
- **Breakdown of compliance program elements**
- **Inefficiency/duplication of efforts**
- **Potential increase in compliance violations**
- **Government investigations**
 - CIA/DPA
 - Fines/Penalties
 - Potential Exclusion

Questions?