BEST PRACTICES LANCE **CRAN**

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THE IMPORTANCE OF A COMPLIANCE EDUCATION PROGRAM

- Establishes/reinforces the foundation of a culture of compliance
- A strong program has the ability to mitigate enforcement actions by regulators
- Provides awareness of corporate policy and ties in with compliance-related regulations
- One of the 10 hallmarks of an effective compliance program according to DoJ and SEC
- Builds overall compliance program credibility and awareness





WHAT IS NEEDED TO DESIGN, IMPLEMENT AND MANAGE AN EFFECTIVE PROGRAM?

STRONG TONE AT THE TOP

•include completion goals on top executive scorecards

•engage in ongoing conversations with leaders about the program

•ensure consistent communications from leadership to all employees

SUPPORTING TONE AT THE MIDDLE

•discussion-based program that can be included in pre-standing meetings

•manager can have the power to select scenarios applicable to their employees

•equip managers with all necessary materials

PROPER PLANNING AND STRATEGY

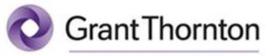
•understand and address cultural roadblocks

needs assessment

•enterprise risk assessments

•audit, investigation, and compliance hotline findings





An instinct for growth

WHAT IS NEEDED TO DESIGN, IMPLEMENT AND MANAGE AN EFFECTIVE PROGRAM?

TRAINING ALL ASPECTS OF YOUR PROGRAM

•code of conduct

•anti-corruption, including third parties

•interactions with government officials and members of the healthcare community

CENTRALIZED REPORTING

dashboards by region/area of responsibility

•program completion monitoring

GLOBAL NETWORK OF SUPPORT

•HR, legal and compliance champions

•business stakeholders





An instinct for growth

HOW CAN YOU ENSURE YOUR COMPLIANCE EDUCATION PROGRAM IS RELEVANT AND SUSTAINABLE?

Continual feedback and implement program improvements

- polling/pulse employee surveys
- focus groups

Total population receives relevant training through audience identification

- online employees
- "offline" employees

Develop supporting materials/programs for all levels of the organization

- "living" FAQs
- quick reference guides
- compliance "help desk"

Employee engagement efforts

- contests
- mobile app
- marketing materials/articles
- roadshows/live trainings
- communication campaigns





WHAT CAN A SUCCESSFUL PROGRAM BRING TO YOUR COMPANY?

- A key component in overall risk mitigation
- Assurance that employees and third parties understand your company's policies and stance on corruption
- Legal defensibility
- Continual support of a culture of compliance





STAY IN TOUCH



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THANK YOU



