

Advertising, Sales, Marketing and Promotion: Integrating Compliance into Commercial Practices

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From the Start: the Partnership Approach

- You can't (and you shouldn't) do it alone
- First: listen and learn
- Show how business and E&C goals are aligned
 - Short-sighted business goal: make the most money fast
 - Short-sighted E&C goal: write a policy for every move
 - Real goal: lasting commercial success
- Turn “can we do it” into “how can we do it”

Keys to Success

- Visible management support
- Customized standards
- Effective communications & training
- Individual commitment & accountability

Management Support: Dedicating Resources

- People
 - Ethics and compliance infrastructure
 - Designated business support
- Time
 - Getting on the agenda
 - Face time with management
- Money
 - Direct and indirect funding

Dedicating Resources: Examples

- Chief ethics/ compliance officer
- Executive steering committee
- Oversight by Board of Directors
- Substantive cross-functional working groups, e.g.:
 - Promotional materials review
 - Pricing calculation and discount disclosure
 - Sampling, other free goods programs
 - Meals and gifts control
 - Standardized disciplinary actions, communications

Management Support: Setting Expectations

- Delivering message
 - Directly
 - In different vehicles (formal/ informal)
 - Repeatedly
- Leading by example
- Drivers and reminders
 - Incorporating goals
 - Negative and positive incentives

Setting Expectations: Examples

- Management emphasis on doing the right thing:
 - Strategic/ tactical planning sessions
 - Sales meetings
 - Promotional program development
 - Interactions with customers
- Balance of sales and ethics/ compliance goals
- Employee recognition programs
- Management delivery of good and bad news, lessons learned

Management Support: Enforcing Standards

- Investment in solutions
- Balanced decision-making
- Consistency
- Meaningful corrective action

Customized Standards: Tailor-Made is a Better Fit

- First step (again): listen and learn
- Input from ground up
- Rules written in business language
- User-friendly tools
- Synergy with business needs
 - Data tracking, reporting
 - Sales communications (to and from head office)
- Roll-out by management, business groups

Customized Standards: Examples

- Time-saving reports, documentation
 - Check-boxes, minimal text required
 - Ready-made forms
 - Intuitive layout
- Handy support resources
 - Fast access (on-line, help desk, hotline)
 - Fast response
- Make the right way the easiest way to get through the system

Effective Communication

- Transparency works here too: take the mystery out of the process
- Celebrate good news, learn from bad news
- Measurable progress, results
- Become part of business routine

Effective Communication: Examples

- Use regular business channels
 - Sales communications
 - Team meetings
 - Business newsletters
- Tailor to the audience
 - Sales: fast, fun and functional
 - Marketing: strategic, tactical fit
 - Executive: get to the point
- “KISS”

Effective Training

- Understanding “why” leads to better “how”
- Mix of vehicles works best
 - Live training for real-time interaction, current questions
 - Computer-based for consistent delivery, broad-based education
 - Short & sweet vs. in-depth
- Repetition is good
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Effective Training: Examples

- Live training:
 - Case studies taken from actual business experiences
 - Promote interaction, avoid solid lecture format
 - Use workbooks, tools for hands-on participation
 - Sales trainers are your best resources
- Computer-based training:
 - Off-the-shelf resources provide basic primers
 - Customized modules make it real

Individual Commitment and Accountability

- Creating an ethical culture
 - Critical to success
 - Turns compliance into a tool, not a weapon
- Taking responsibility: employee and manager
 - Link to personal integrity, pride
 - Avoid the “just following orders” excuse
 - Management role: accountability for staff actions

Continuous Improvement

- *Revisit* program components:
 - What do the trends tell you?
 - How are they working in the business?
- *Revise* as needed
 - Update for new developments
 - Clarify with FAQs, examples
 - Streamline for more practical use
- *Refresh* to keep the message meaningful