



# Compliance Lessons from the Trenches

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# First Observation

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- The chief ethics and compliance officer, or ECO, should want to be seen as the leader of a business function in the Company and not as an internal police officer.



# Second Observation

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- Relationships are critically important.



# Third Observation

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- There is no room for ego in doing this job well.



# Fourth Observation

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- Innovation is a challenge!



# Fifth Observation

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- There must be individuals at each local business unit to deliver the ethics and compliance program.



# Sixth Observation

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- There must be a system to routinely solicit and consider field input.



# Seventh Observation

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- There must be an effective utilization of technical expertise.





# Eighth Observation

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- Ensuring that all operational leadership is engaged is very difficult.



# Ninth Observation

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- You need to have senior management who in a very intuitive way buy into this kind of effort.



# Tenth Observation

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- There must be an appreciation of true ethical dilemmas faced by an organization and how they should be resolved.



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