

BEST PRACTICES PAPER

ECI BENCHMARKING GROUP ON
ETHICS AMBASSADOR PROGRAMS

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ABOUT ECI

The Ethics & Compliance Initiative (ECI) is a best practice community of organizations that are committed to creating and sustaining high quality ethics & compliance programs. With a history dating back to 1922, ECI brings together ethics and compliance professionals and academics from all over the world to share techniques, research and, most of all, exciting new ideas.

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ABOUT ECI'S WORKING GROUPS

In an effort to encourage networking and collaboration among ethics & compliance (E&C) professionals, ECI regularly convenes small groups of our members to network, share ideas, and address issues that are of particular interest. Working groups of 20 to 25 individuals meet to identify, research, and develop new resources to help practitioners prepare for a new or emerging E&C issue. They also learn from best practices with regard to an existing E&C program area.

Several new working groups are now open. For more information about those groups, please see the back cover. For other information about ECI's working groups, please visit: www.ethics.org.



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INTRODUCTION & BACKGROUND

The purpose of this Best Practices Paper is to provide Ethics & Compliance Initiative™ (ECI) member organizations with information that will support their efforts to plan and implement an Ethics Ambassador (EA) program or enhance an existing EA program.

In September 2017, ECI formed a benchmarking group to review best practices in EA Programs. EAs, also known as Ethics Liaisons, are increasingly used and relied upon in organizations as an effective and cost-efficient element of an overall ethics & compliance (E&C) program. Typically, an EA is a regular, full-time employee who assumes responsibility for supporting and promoting the E&C program in addition to his or her primary role, which is usually not related to ethics.

WHAT IS AN EA?

The EA Benchmarking Group determined its working definition of EA to be:

“ An employee designated as a single point of contact within an organization’s business units to assist with building and sustaining an ethical culture through communication, training and other ethics - or compliance-related initiatives.¹ ”

Across many industries, as E&C programs mature, the emphasis is on operationalizing ethics & compliance, weaving E&C considerations into the fabric of the organization and its decision-making processes. EAs help with this process, because their role is to represent their organization’s ethics program within their business units or at remote sites.

WHY HAVE AN EA PROGRAM?

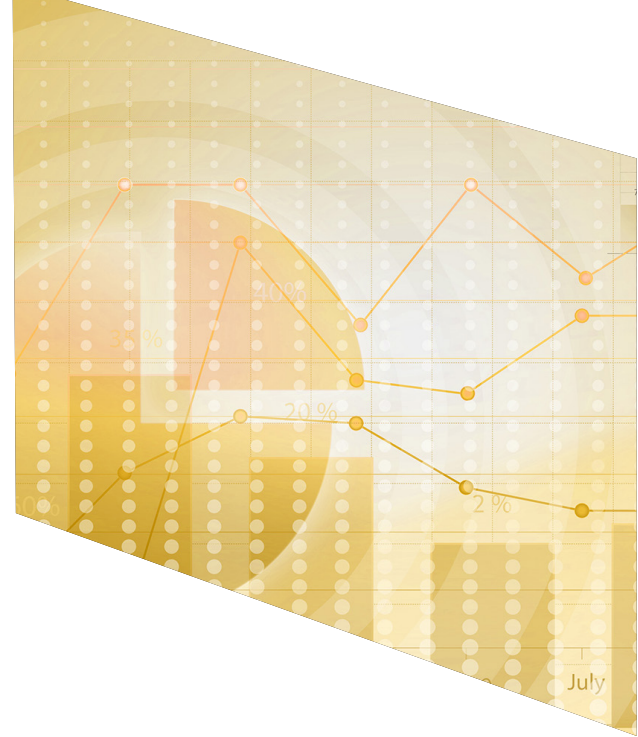
EAs extend the reach of the ethics & compliance office throughout the organization. They help to make ethics messaging relevant to the business units in which they operate and they demonstrate the organization’s commitment to ethics & compliance.

In addition, they serve a critical role in promoting an ethical culture, improving local risk detection and encouraging a “speak up” culture. EAs provide feedback on the organization’s ethics culture that might otherwise not be brought forward by other employees. They can also provide guidance to employees who may not choose to use corporate disclosure channels or helplines.

1. This is a slightly modified version of the definition used in the March 2017 ECA Member Survey on Ethics Liaisons, conducted in partnership with DTE Energy.

METHODOLOGY

Over a period of 6 months, from September 2017 through March 2018, the ECI benchmarking group conducted its review of EA Programs. The group collected information about the benefits of EA Programs, as well as challenges experienced by organizations that have implemented such programs. The benchmarking group compiled best practices for the successful implementation of an EA program.



Methods of information gathering included:

- **Conference Calls:** The ECI benchmarking group held monthly conference calls. Group members employed by organizations with EA Programs shared their experiences. Conference call participants shared success stories, challenges, and lessons learned.
- **Benchmarking Surveys:** The ECI benchmarking group reviewed the results of a March 2017 Ethics & Compliance Association (ECA) member survey on “Ethics Liaisons.” In addition, the ECI benchmarking group developed another survey about EA programs to solicit additional information. The new survey was distributed to the ECI member community via email and completed by twelve (12) member organizations.
- **Document Reviews:** As part of the ECI benchmarking group’s research, documents pertaining to existing EA Programs were shared and reviewed by the group’s members.

This report is organized into four sections:

1. Ethics Ambassador Program Organization Design
2. Appointment, Training and Support of Ethics Ambassadors
3. Management of Ethics Ambassador Programs
4. Ethics Ambassador Performance Management/Program Effectiveness

Detailed information pertaining to each of the sections is provided in a question/response format.



1

ETHICS AMBASSADOR PROGRAM ORGANIZATION DESIGN

How does the organization structure an EA program?

Most commonly, a recognized organizational leader, such as the Chief Ethics and Compliance Officer (CECO), determines the structure of the EA program, with input from other leaders within the organization. Other leaders may include business unit heads, the Chief Financial Officer, and program managers. This top-down method makes sense given that tone often starts at the top, and because the organization's leaders set policy and have access to budgets.

How many EAs do organizations have and how is that determined?

Generally, organizations with EA programs appoint one for each business unit. The number may also be based on organizational risks.

Key Considerations:

- Number of company locations
- Number of business functions
- Requests from business units
- Percentage of total employee population

“ A good rule of thumb used by many organizations is **one EA** for every **200 employees**. ”

Where are the EAs located?

Organizations generally have at least one EA in each business unit location.

Key Considerations:

- The geographic regions (including states, provinces, and countries) in which the organization does business
- All major or mid-sized facilities
- High-risk business units
- Widely dispersed throughout the organization

Regardless of the formula an organization uses to determine the location of its EAs, it is best to factor in the size of the organization and number of locations. Since two of the key functions of an EA are to help identify issues that may otherwise be missed or not heard and to disseminate ethics messages to all areas of the company, it is best to recruit EAs from as many locations and business units as possible.

What is the “profile” of the EAs? At what organizational level or within what function do they sit? What competencies do they require?

Regardless of the process the organization uses to appoint them, EAs should be willing participants in the program. In some cases, senior leadership identifies well-suited employees and encourages them to volunteer for the role. Selection criteria should be carefully considered and communicated to stakeholders.

Key Considerations:

- tenure with the organization
- strong interpersonal skills
- good communication skills
- reputation for fairness and objectivity
- reputation as a leader who lives the organization’s values; acts as a role model and supports its ethics culture
- credibility
- approachability
- influential among their peers
- knowledge of the business unit and its formal and informal communication channels
- familiarity with the organization’s resources
- the ability to commit sufficient time to the EA program

Director- and manager-level employees most often are appointed as EAs, but in some organizations, first-line supervisors and/or individual contributors can fulfill the role, as well. The level generally depends on the responsibilities assigned to the role. EAs can be sourced from various business units and from various levels within an organization.

Some organizations look for EAs who can perform duties such as conducting investigations or providing guidance to their colleagues. Most organizations screen their EAs through an internal process to ensure that candidates have not had their own ethical challenges because they will represent the ethics & compliance office.

Are EAs full-time? Do EAs assume additional responsibilities in addition to their regular job?

The difference between full-time ethics & compliance program staff and EAs is that EAs assume their ethics responsibilities in addition to those of their regular full-time jobs. Most organizations report that ethics responsibilities of an EA take approximately 5-15% of the employee's time. EAs are, therefore, a highly cost-efficient means of extending the reach of the ethics & compliance program. Organizations use EAs to promote an ethical culture, reinforce ethical messaging, encourage a "speak up" culture, and provide feedback to the ethics & compliance office on local risk issues.

What are the EAs' roles and responsibilities? Who are their major stakeholders? To whom are they accountable? With whom do they interact in their liaison role?

The role of an EA is to act as a point of contact within an organization's business unit to assist with building and sustaining an ethical culture through communication, training, and other ethics- or compliance-related initiatives and activities. EAs Responsibilities:

- Risk identification
- Report/Allegation intake
- Act as ground-level representatives of business units/provide a means to surface issues to upper management through the ethics office.
- Promotion of a "speak-up" culture
- Responding to employee questions on policies
- Identifying resources to employees
- Retaliation monitoring
- Conducting or supporting ethics investigations

Generally, EAs are accountable to their direct supervisor and the central Ethics & Compliance program (E&C) office.

Major stakeholders include the EAs' business unit colleagues, the E&C office staff, and fellow EAs.

2

APPOINTMENT, TRAINING AND SUPPORT OF ETHICS AMBASSADORS



How are EAs recruited and/or selected?

Most commonly, EAs are assigned or nominated to their roles by senior leadership. In instances where senior leaders nominate, but do not make the final selection, or where interested employees volunteer, organizations tend to use an application or interview process. Application processes are generally led by the E&C office or are a joint effort between the E&C office and the business unit.

Some organizations set certain seniority level requirements for their EAs, such as manager/director level positions or sometimes at lower band levels within an organization. The level of seniority needed for EAs depends in large part on the responsibilities set out for EAs in the program.

In addition, some organizations limit the eligible universe of employees who can take on the EA role by function. For example, an organization may determine that Human Resources or Legal department employees may not be EAs. There is no one-size-fits-all approach to defining the criteria; it depends on what works for each organization.

Additional information regarding selection criteria for EAs is available in the response to the question about the “profile” of EAs under the previous report section “Ethics Ambassador Program Organization Design.”

Is there a formal vetting process?

The E&C office staff generally takes the lead on vetting EA candidates. This screening should include a review of each candidate’s qualifications and desire to be part of the program. Organizations should be mindful of ensuring that the process remains focused on comparing each candidate against the stated qualifications for EAs, rather than allowing the process to evolve into a popularity contest. The vetting process may also include a review of whether the applicant has been the subject of an ethics investigation or other disciplinary matter.

What is the duration of the appointment as an EA?

When considering the duration of an EAs term, there are competing considerations that must be balanced. Organizations must weigh the time, effort, and expense of training new EAs with the need for prospective EAs (who take on EA responsibilities in addition to their regular job responsibilities) to make a manageable, time-limited commitment. Further, while the highly engaged EAs may want to stay in their roles for longer terms (or even indefinitely), consideration must also be given to the value of giving additional employees opportunities to participate. This is particularly important for programs that feature a professional development component as part of the value proposition to the EA. Organizations should also be mindful of the value that an ever-expanding network of “Ethics Ambassador Alumni” can provide. For organizations that use defined terms or term limits for EAs, durations commonly range from one to three years, with some organizations allowing EAs to elect to extend their terms.

How does the organization attract employees to the role of an EA?

There are many different ways for an organization to attract employees to the role of an EA:

- Organization’s Ethics & Compliance Intranet Site – The organization’s E&C program site may provide an overview of its EA program, along with the EAs role and responsibilities, and frequently asked questions and answers.
- Current EAs – Current EAs are a good resource to promote the program. They are the co-workers and colleagues of potential EA candidates. An interested employee can get a first-hand perspective of what is expected in the EA role.
- Organizational Communications – These communications may include awareness or recognition articles written about an employee who is an EA and the organization’s EA Program, departmental or divisional newsletters, information boards, and electronic screens.
- Staff Meetings – The recognition and support of the EA in staff meetings can be essential in attracting employees. Getting EAs on meeting agendas and providing them time to fulfill their duties demonstrates that senior leadership is on-board with promoting E&C topics and the EA program.
- Information Sessions for Interested Employees – The E&C department can hold informational sessions to get employees excited about the EA role and program. These sessions also give employees the opportunity to ask questions.

What are the benefits to an individual employee for being an EA?

Organizations highlight several benefits to the employee for being an EA, such as:

- Learning new skills and in-depth training on specific risk areas – EAs have the opportunity to engage with internal subject matter experts or external resources through seminars and workshops to enhance their career development.
- Expanding their organizational network – EAs network with other EAs from other divisions or geographic areas across their organizations to share insights on best practices for their roles and learn about other areas of the organization.

- Early access to organization initiatives and information – EAs typically have the advantage of hearing about organization initiatives and topics early, which can broaden their exposure to E&C or other strategic business issues within the organization.
- Interacting with senior leadership – EAs get an opportunity to interact with senior leadership at meetings, allowing EAs to ask questions and hear insights from senior leadership. This is a valuable benefit for employees who do not usually have opportunities to meet with senior leadership in person or get in-person recognition from them.

What do organizations provide EAs for onboarding and ongoing training?

New EAs generally receive initial onboarding training about the history and evolution of the organization’s ethics program, responsibilities of their board and senior leadership with regard to the E&C program, responsibilities of those within the ethics/compliance function, familiarity with the organization’s Code of Conduct and related policies, the organization’s E&C training requirements for all employees, and the organization’s E&C training requirements for all employees, as well as training targeted for specific groups. Additional onboarding topics usually include:

1. how to respond when an employee approaches them and wants to share an ethics-related concern;
2. how the company hotline/helpline functions;
3. when and how to recommend an employee report their concern to the hotline/helpline; and,
4. when they, themselves, should refer matters to the E&C office or to management.

The benchmarking group survey revealed that companies use a combination of in-person, webinar and telephone communication methods to conduct onboarding training. Best practices include providing one-on-one orientation with the CECO director and meetings with other business leaders. Some organizations provide an EA Manual.

The majority of companies with successful EA Programs organize regular (monthly or quarterly) calls or meetings to bring the EA team together, whether by telephone or in-person. Many also hold semi-annual or annual in-person gatherings for all EAs. These regular meetings, conference calls, or webinars not only provide useful networking and team-building opportunities, they also are frequently used to provide in-depth training on specific risk areas. One best practice is to arrange for a subject matter expert to address a specific topic with the EA group.

Topics of training for EA include:

- Active Listening Skills / Complaint Intake Skills
- Conflict Resolution
- Presentation Skills
- Interviewing Skills
- Code of Conduct and other relevant policies

- Conflicts of Interest
- Conducting internal investigations (depending on the responsibilities assigned to EAs in the organization)

In many organizations, the primary job of the EA may be unrelated to their role as an EA and may require very different knowledge and skills. Therefore, it is important to provide training and support to equip EAs to be effective in their EA role, because any job-related training they receive may not be relevant to their EA responsibilities.

What other resources and support do organizations provide to EAs to help them succeed?

EAs are provided many different types of resources and support by the organization in order to ensure success. These resources and support are in the forms of:

- EA Team Meetings/Calls – The engagement of EAs in regular meetings and feedback sessions (via both phone and in-person) is essential to discuss current issues and concerns, plan initiatives, and evaluate statistical data.

These meetings/calls provide encouragement, answer questions, and solicit ideas. They are opportunities to:

1. pass along materials for EAs to use while engaging colleagues;
2. provide assistance regarding E&C related issues and concerns;
3. network with other employees across the organization;
4. hear from senior leaders and organization subject matter experts on notable organization initiatives;
5. discuss and evaluate data from surveys, allegations, inquiries, and feedback from senior staff; and facilitate the creation of organizational; and
6. local training plans.

These meetings/calls are typically held either monthly or quarterly.

More specific examples of what is shared during these meetings/calls include: ethical spotlights; ethics moments; messages to the field; newsletters; case studies; and reports.

- E&C Program Information – EAs are provided information regarding the E&C program, significant issues or cases, evolving laws, regulations and /or policies, etc., throughout their tenure. This can be accomplished with an Ethics SharePoint Site, an Ethics Discussion Board, and/or access to an Ethics Database.
- Training Materials – Training and communication materials are prepared and provided to EAs along with visual collateral (posters, handouts, and apparel) for their use with the employee

populations they support. In addition to formal training material, EAs may be provided with a script with monthly themes/interest items to discuss with colleagues.

- Outreach – EAs are provided the opportunity to invite external speakers, conduct site visits, and participate as guest speakers during existing division training sessions and meetings. EAs may be assigned a team to engage with by holding monthly calls to discuss trending information, ethical dilemmas and allegations (scrubbed versions), and ideas on how to prevent behaviors and mitigate risk. EAs also have opportunities within each function to train, present, or otherwise engage employees. The materials to conduct these calls and engage employees are provided by the organization to the EAs.
- Tool Kits – One best practice is to provide EAs with an EA Tool Kit, which may include:
 - A summary of EAs roles and responsibilities
 - Contact information for EAs
 - A copy of the standards of ethical conduct
 - A copy of key policies
 - Key E&C office communications
 - An ethics officer manual
 - A desk guide to investigations
 - Quarterly themed presentations and materials; videos; games; and flyers
- Conference Attendance – EAs attend annual conferences, annual investigation training, and engage in development opportunities and training on more in-depth topics.



3

MANAGEMENT OF THE ETHICS AMBASSADOR PROGRAM

This section is about the common challenges that arise from the ongoing management of an EA Program and the best practices utilized by organizations to mitigate or overcome them. In the Benchmarking Group survey of ECI member companies, the top challenges in managing EA Programs were identified as:

- Keeping EAs engaged
- Not having enough coverage
- Attracting desirable talent to become EAs
- Getting buy-in/support from the EAs direct supervision
- Gaining buy-in/support from other business leaders

The other significant challenge identified in the survey had to do with clarifying the role of the EAs as the program evolved, particularly the challenge of identifying how the EA could have optimum impact, given the sometimes-limited amount of their time allocated to EA Responsibilities.

Additionally, EAs represent the ethics program/office and their actions impact the reputation of the program. An EA who consistently gives poor guidance, is uninformed or disengaged, or whose conduct places them under the scrutiny of an investigation can undermine the program's credibility. Therefore, it is critical to ensure EAs remain committed, engaged and up to date with current information. Periodically coordinating with the internal investigations or human resources teams to monitor whether any EAs have had any issues, themselves, with misconduct allegations is recommended. Ethics program administrators are responsible to hold EAs accountable for following through on their responsibilities and managing the program in ways that ensure the EAs enhance its effectiveness.

How do organizations keep EAs engaged?

Many companies include having a passion and genuine interest in ethics as criteria for selecting EAs. EAs want to make a difference and the program gives them an opportunity to support their organization's ethical culture. To be successful, EAs must have clearly defined expectations, so that they understand their mission and the boundaries of their role. Second, they must be given the tools and support necessary to execute their mission. Lastly, there must be activities that are meaningful to both the EAs and

the organization. A critical component to their success is finding ways to keep them engaged.

In a successful EA program, their managers understand the EA role, give them time to fulfill their duties, and consider the EAs additional efforts when evaluating their performance. To maximize engagement, EAs should be provided with tools that help them to communicate a consistent ethical message across the company, while maintaining the ability to tailor the message to their local audience. Customizing a message that will resonate locally allows the EA to be of service to their co-workers by providing communications that will resonate in their unique work environment. The ability to tailor messaging, with appropriate oversight from the Ethics Office, allows the EA to exercise creativity outside of their day-to day area of expertise. The EA can have a direct impact on the ethical culture by bringing a fresh perspective to ethics communications.

Impactful and engaging activities include:

- Providing feedback to the Ethics Office on the effectiveness of the Code of Conduct, ethics initiatives, communications and outreach, including messaging and training
- Participating as guest speakers during training sessions and meetings
- Recommending modifications to the Ethics Program, as necessary, to meet new situations and challenges
- Promoting a Speak Up culture
- Providing guidance to employees on ethics questions, including conflicts of interest and gifts, meals and entertainment
- Providing opportunities to network with other employees across the company
- Hearing from senior leaders and company subject matter experts on notable company initiatives
- Learning more about the company and its business
- Attending E&C professional conferences/meetings
- Participating in developmental training on relevant topics such as team building, skill development, leadership training, active listening skills, presentation skills and conflict resolution
- Writing articles and blogs for their organization's communication vehicles
- Organizing local ethics events
- Meeting regularly with local management to identify specific compliance and ethics issues for feedback to ethics & compliance office
- Promoting and encouraging the timely completion of compliance training

How do organizations ensure sufficient coverage of EAs throughout the organization?

Organizations utilize different options regarding coverage, including; at least one representative in each business unit, EAs widely dispersed across the organization, in some of the states/provinces/countries where they do business, one for each geographic region in which they have operations, at each company facility/business unit or in nearly all major to mid-sized facilities and in many smaller sites.

Appointing EAs at many organizational levels also affords greater coverage throughout an organization.

Some organizations indicated that they use social media sites (i.e., Yammer) to connect their EAs so that they can support each other. Organizations also try to bring all EAs together regularly (or at least annually) for meetings and trainings; either physically or they conduct monthly/quarterly conference calls.

How do organizations attract desirable talent to want to be an EA?

The earlier section of this report entitled “Recruitment, Training and Support of Ethics Ambassadors” includes information about (1) mechanisms organizations use to inform and generate interest among employees in becoming EAs and (2) the benefits realized by individual employees as a result of serving in an EA role.

As an EA program matures in an organization, employees gain familiarity with the role and its purpose, which encourages participation in the program. Organizations emphasize the potentially career-enhancing benefits of taking on the role to interest desirable candidates, including:

- Learning new skills
- Networking with other EAs across the organization
- Visibility and the opportunity to interact with senior leadership
- Having EA responsibilities added to one’s performance review
- Early access to company information and initiatives
- Gaining a broader visibility and understanding of the business and the organization
- Recognition: EAs are recognized by being mentioned in corporate communications materials, individually by senior leadership, by having EA Activities mentioned in annual review process, provided with training and development opportunities and/or at company award ceremonies.

Since the majority of responses to both surveys considered by this Benchmarking Group indicated that EAs are most often assigned or recommended by Senior Leaders or ethics & compliance leadership, it is key to have a process for soliciting nominations from Senior Leaders that helps them identify optimal candidates for the EA role. Reaching out to ask for nominations takes place among other populations, as well: some organizations prefer to have the organized parts of their workforce fully participate in the EA program, so they work with union leadership to solicit nominations.

How can the program gain buy-in from leadership?

Research shows that businesses with strong ethical cultures outperform those without strong cultures. Today many companies face the challenge of communicating across multiple, geographically diverse sites, with varied operations and, in many cases, unique cultures. An EA is a person who knows their business the best and can deliver and frame messages in language that will resonate locally and be

delivered at the right time in their business cycle.

Much has been written about the importance of tone from the top and middle in creating an ethical culture. Getting buy-in and support from EAs direct managers and other leaders is key to creating and sustaining a successful program. Leaders from the C-suite to first line of supervision must be sold on the value of EAs as a mechanism to integrate business ethics into daily operations. So the question becomes...how to sell leadership on the value of an EA program?

Key points to consider communicating to leadership to ensure buy-in include:

- Companies with ethical cultures attract and retain high quality employees
- Ambassador programs are a cost-effective way to extend Ethics & Compliance reach and effectiveness
- Actively promoting a culture of integrity and responsibility protects all employees and safeguards company assets
- Can improve local risk detection
- EAs give feedback on the ethical culture that might otherwise not be brought forward
- EAs can feel the “temperature” of the organization by listening to the stories people share about the company and its values
- Supporting an EA program demonstrates a visible commitment by leadership to ethics & compliance
- EAs are a source of advice and guidance for employees who may be uncomfortable with using corporate disclosure channels or hotlines and would prefer to talk with someone locally
- In an era of mergers and acquisitions, EAs can provide insight about how successfully cultures are integrating
- EAs can recommend modifications to the Ethics Program and compliance training to meet new situations and challenges
- EAs can tailor ethics messaging and make it relevant to the business units in which they operate by using examples from their own work

What are the special considerations for establishing an EA program with a global reach?

According to the benchmarking group survey, significant challenges in implementing an international EA program include:

- The need to comply with different and sometimes competing regulations
- Communication issues
- Working across time zones
- Differing access to technology and resources

- Additional cost due to working with multiple languages
- The need to answer to different regulatory bodies

Other challenges identified included gaining leadership buy-in for low risk areas, accounting for cultural differences in materials with languages and graphics, keeping EAs engaged when geographic distance prohibits in-person meetings with E&C staff and other EAs, and keeping EAs trained when their full-time jobs take priority.

Global companies attempt to mitigate distance challenges by holding regular meetings via teleconference and/or at varying locations and centers of operation, e.g., major cities. Some organizations conduct conference calls multiple times in a 24-hour period in order to provide access to EAs around the globe.

Translation issues are always a communication challenge in a global organization, but communication challenges can be rooted in cultural differences, as well. A company's EAs can serve as a valuable resource to help with proofing / reviewing translated communications, Codes of Conduct, training, and so on, as well as providing cultural sensitivity checks on these types of materials.

The right resources must be brought to bear on situations complicated by the need to comply with a variety of jurisdictional regulations. E&C program leadership should be aware of the issues and work with legal counsel to take the appropriate approaches, including helping EAs in remote international locations. Some organizations support their EAs by creating supplemental materials for the Code of Conduct, ethics training, etc., with country-specific tailored guidance.

4

ETHICS AMBASSADOR PERFORMANCE MANAGEMENT AND PROGRAM EFFECTIVENESS



How does an organization evaluate the performance of EAs? Who has input to their performance goals and performance evaluations?

Measures most commonly used to evaluate the performance of EAs include:

- Employee engagement and awareness
- Number of inquiries/requests for advice raised to EAs from other employees
- EA communications and other initiatives
- Training activities
- Subjective evaluation of the EA by the ethics & compliance office in consultation with the business unit.

Performance goals of the EAs are primarily identified by the ethics & compliance office and the business unit that the EAs support. Performance evaluations of EAs are conducted by business unit management, with input from the E&C office.

Does the organization have a means to recognize or reward exceptional EAs?

Since the EA role is a voluntary addition to the employee's regular job, for which there is not usually additional monetary compensation, recognition for this "above-and-beyond" role is critical. Most organizations provide recognition for their EAs' contributions in visible ways, such as:

- Written recognition in corporate communications
- In-person recognition in business unit or department meetings
- Invitations to meetings with company leaders with whom the EAs would not normally interact
- Internal recognition programs involving nominations for superior performance
- Annual performance reviews.

Why does an organization choose to utilize EAs? What are the primary benefits to the organization for having EAs?

EA programs offer companies a highly cost-effective way to extend the reach of the ethics & compliance office – and promote and support an ethical culture - throughout the organization. The most significant benefits to organizations that responded to the surveys are that EAs:

- Reinforce ethics messaging
- Improve local risk detection
- Promote ethical culture
- Improve speaking up
- Enhance communications through the ability to tailor tone, content and timing to improve local effectiveness
- Improve ability of HQ / the ethics & compliance office to understand business unit local culture and constraints

In the previous section of this report entitled “Management of the EA Program” is a list of key points to emphasize when gaining leader buy-in for the program; these points represent additional benefits to the organization.

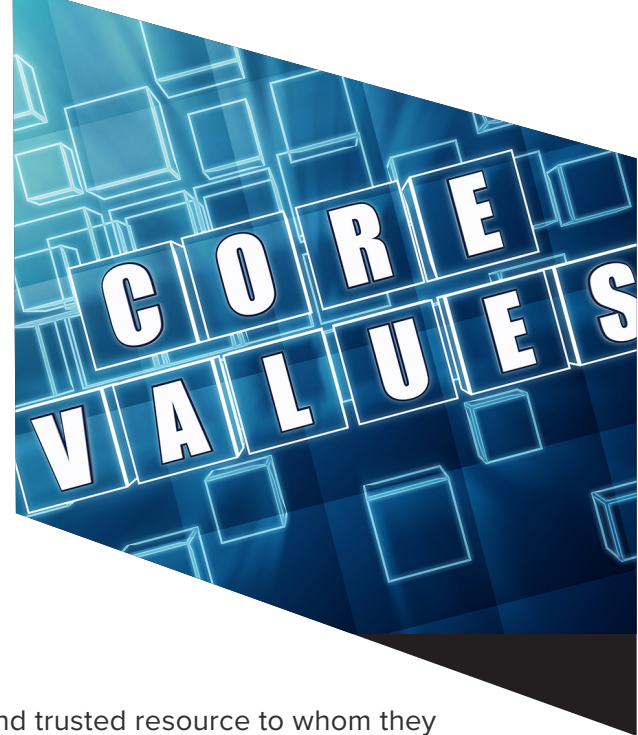
How does the organization measure the success of the EA program? What are the objectives of the program? What metrics are used to measure it?

Common metrics used to evaluate the effectiveness of the overall EA program include:

- Program awareness
- Training activity
- Number of inquiries/requests for advice raised to EAs
- Changes in behavior in the workplace

Some organizations also consider factors such as culture scores, volume of communications on ethics and conflict of interest disclosures.

CONCLUSION



More and more, organizations are implementing EA programs to work in conjunction with the ethics & compliance office to actively promote and embed the firm's values and culture company-wide. This approach is highly cost-effective, as it leverages the experience, knowledge and skills of employees who are already established in the business and augments their responsibilities with the additional role of the EA.

EAs serve as local advisors to provide employees with a known and trusted resource to whom they can report concerns and ask questions. EAs are able to steer employees to helpful resources and refer them to other departments or individuals (e.g., in Human Resources, Security, or the ethics & compliance office) when appropriate. They function as a liaison for the ethics & compliance office, sharing insight into unique business unit character and needs. They promote the values and ethical culture messages of the organization across the business.

For the EA, taking on this supplemental role offers opportunities to learn and practice new skills, gain visibility into new and different facets of the organization, interact with a broader group of colleagues, and enjoy a new level of exposure to leaders.

EA programs need to be carefully planned and implemented in accordance with the unique needs of the organization, but when well managed, they are a highly efficient and effective means of enhancing the ethical culture and contributing to the long-term success of an organization.

JOIN A WORKING GROUP

New working groups are forming now. Each group is dedicated to comparing program practices based on one of the HQP principles. Join 20 to 25 peers to get new ideas and discuss the ways your organization can advance your efforts. Groups are limited to ECI members and new topics include:

- ANTI-RETALIATION
- IMPLICATIONS OF ARTIFICIAL INTELLIGENCE IN E&C
- PREVENTING CORRUPTION
- PRACTICAL APPLICATIONS OF TECHNOLOGY IN E&C
- STRATEGIC PLANNING IN E&C

*To join a working group, please contact
Casey Williams at casey@ethics.org.*

