Kilpatrick

Insights: Perspectives

9 Key Takeaways | Leveraging "Low-Hanging Fruit" to Improve Compliance Programs in 2020

FEBRUARY 7, 2020 Written by

KILPATRICK TOWNSEND

9 KEY TAKEAWAYS

Leveraging "Low-Hanging Fruit" to Improve Compliance Programs in 2020

Adria Perez, Kilpatrick Townsend Partner on the firm's Government Enforcement & Investigations Team, offers the following 9 Key Tips in "Leveraging 'Low-Hanging Fruit' to Improve Compliance Programs in 2020."

Key takeaways from the presentation includes:

1. Develop and collect evidence of senior management's commitment to compliance and "tone from the top," including meeting minutes, newsletters or videos.

2. Ensure your internal policies are adapted to the relevant local languages and laws and are culturally relevant.

3. Develop compliance reminders throughout the year, including those concerning:
   - Whistleblower system and how to use it;
   - Where and how to seek compliance advice;
   - Local holidays that may lead to gifts and entertainment requests and the related internal procedures to respond to those requests; and
   - Key compliance policy provisions and processes to keep in mind.

4. Coordinate with other departments, such as HR and IT, on communication methods and timing, including via:
   - Workplace by Facebook;
   - Email;
   - Screen savers;
   - Intranet posts or app notifications; and
   - Five-minute or less videos when logging onto the corporate IT network.

5. Recognize compliance and ethical leadership and those who embody corporate values on the corporate communication platforms.

Share internal compliance "near misses" or stumbles (without disclosing names or

Share internal compliance "near misses" or stumbles (without disclosing names or confidential information), as well as competitor mishaps, to provide examples of when issues can occur and how to notice "red flags."

6

7

Start the processes to continuously collect compliance program-related data, such as

- Hotline usage;
- Hits on the corporate compliance intranet pages;
- Number of comments or likes related to Workplace compliance posts; or
- Number of employees, who watched the reminder videos, etc.

Schedule dates to review the compliance program-related data on a regular and consistent basis in order to improve any communication methods.

8

9

Develop brief "Do's and Don'ts" for various department personnel, such as those in sales, based on yearly events, like regular sales and marketing conferences and industry events.

For more information, please contact:
Adria Perez, aperez@kilpatricktownsend.com

www.kilpatricktownsend.com