

# Compliance & Ethics Professional

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# Recipe for a Compliance Day in 2012

- » Reach out to SCCE and other compliance professionals for valuable ideas.
- » Events should reflect your company's culture and stay on budget.
- » Contact different company departments for their expertise and suggestions.
- » Initiate a Planning Committee early. Things always take longer than you think!
- » Plan a simple event for your first year. You can always add more later.
- » Engage your employees with fun contests and creative prizes.

At FIS™, the world's largest provider of banking and payments technology, we put our Compliance Day "recipe" together to promote ethical behavior through education and awareness. Our first Compliance Day—Spotlight on Ethics—was held in August 2011. The goal was to encourage internal reporting of ethical issues and raise awareness of the FIS ethics hotline/website as a tool for reporting potential ethics violations. We chose to put the spotlight on ethics because honesty and ethical behavior are integral parts of our corporate culture and the foundation of our company's five Guiding Principles.



Scavelli

Another selection consideration, in the age of the new Dodd-Frank Wall Street Reform and Consumer Protection Act, was the benefit to the company of making our internal reporting mechanisms more visible to employees. FIS's online Compliance Day enabled us to satisfy our employees' hunger for awareness regarding the company's Code of Business Conduct and Ethics, other policies, and ethical dilemmas (such as conflict of interest), as well as the tools used to report misconduct. The positive feedback we received from our annual

Ethics Awareness Survey in December 2011 confirmed our goal was achieved.

## Ingredients—Ideas from SCCE

SCCE's website<sup>1</sup> gave us the inspiration and resources to put together our first Compliance Day. The website provides a tutorial Web conference, awareness ideas, promotional posters, and articles from other companies documenting their various compliance celebrations. As a relatively new member, I found SCCE's Compliance and Ethics Academy was also a valuable resource, providing relevant training classes on topics and material which enhanced our vision of Compliance Day. Attending the Academy was especially beneficial because of the opportunity to meet other compliance professionals and swap "recipes." One ingredient for our recipe came from a fellow attendee who suggested an electronic scavenger hunt. This activity was challenging, educational, and a lot of fun for the employees. Details concerning this activity will be discussed later on.

## Know the shopping budget—Get creative

Each year, Corporate Compliance & Ethics Week is celebrated in May. Because FIS's annual client conference is also in May, we

chose to hold our compliance event in August so that we could draw upon internal FIS resources, such as Marketing, Professional Development Training, and Corporate Communications. We knew that our large and geographically dispersed employee base made it difficult to host an onsite event. Instead, we decided to have an online celebration. Our initial rollout was targeted to U.S. employees and featured our inaugural FIS Corporate Compliance “Walk the Talk” newsletter and new online ethics awareness training. FIS’s international locations are scheduled to have their own Compliance Days throughout 2012 with the appropriate customization and translations.

To garner attention and excitement surrounding the upcoming day, we announced an essay contest with a prize. Employees were encouraged to submit an essay, in 500 words or less, on what compliance and ethics means to them and describe how adherence to these concepts influences the day-to-day decisions they encounter on the job. The top three winners won a coveted (and “budget low-cal” item)—an extra vacation day. The first place essay winner was featured in our newsletter. Utilizing our budget low-cal approach, we tried to keep costs to a minimum and relied on internal resources to promote and host the event.

We advertised the event through an e-mail blast and a customized electronic banner on the FIS Intranet. The banner, featuring an eye-catching animation, was created free of charge by our Marketing department and conspicuously posted where most employees would see it during the weeks leading up to the day. We also mentioned the event in other online

communications. Our Marketing department also assisted with the format, branding, and customization of our newsletter. Fortunately, our customized new ethics awareness training was done in-house by our subsidiary, FIS Compliance Solutions,<sup>2</sup> which kept costs down as well. In keeping with our theme of a spotlight, the main expense was green (FIS’s main brand color) mini-flashlight prizes imprinted with the FIS Ethics website address.

### Event recipe

Combine department input and add a dash of your company’s culture.

When trying to create an event that aligns with your company’s culture, you need to ask some insightful questions. Are you an informal or formal company? What issues are important to your business and why? Who is

your audience? What time of the year is best for an event of this nature? What is your budget? What is your company’s culture and communications tone?

By using your company’s departmental

resources, you will be able to spice up your Compliance Day. By combining input from different internal resources and the answers to the above questions, you can create your perfect signature dish using the following quick recipe:

1. Start a Planning Committee with executive support to achieve the best collaboration possible. As we learned, tone from the top is very important for success.
2. Stir in representatives from Marketing, Professional Development Training, Human Resources (HR), Legal, Information Security, Risk, Internal Audit, and management. Every area has a different perspective and can be helpful in serving

*“When trying to create an event that aligns with your company’s culture, you need to ask some insightful questions.”*

up your creation. The FIS Marketing team assisted with the customization and layout of the newsletter, editing, and online advertising, and, together with HR, offered valuable insight into past successes (and failures) in organizing and conducting company-wide events. FIS's Information Security team contributed an article about the importance of data security and how to report a security incident.

3. Combine the expertise of these groups to suggest topics, write content for the ethics awareness training, and be part of the pilot group to provide feedback on the training.

### **Our signature dish—FIS Compliance Day 2011: Spotlight on Ethics**

Several months prior to the event, we planned an initiative to have employees renew their acknowledgement of the Code of Business Conduct and Ethics. By doing so, employees refreshed their understanding of the company's ethics expectations and were primed to be receptive to our message about Compliance Day. We then mentioned the upcoming event in an Ethics Essentials article featured in our quarterly HR newsletter. Three weeks prior to the online event, we sent out a communication announcing the essay contest and explaining that Compliance Day would feature brand new ethics awareness training. We also sent an inaugural FIS Corporate Compliance "Walk the Talk" newsletter.

On the actual Compliance Day, we sent out an electronic communication with a link to our newsletter and the online training link through FIS Compliance Solutions. Our training topics included:

- ▶ Conflict of interest
- ▶ Gift policy
- ▶ Fair dealing
- ▶ Compliance with laws
- ▶ Handling confidential information
- ▶ Security awareness

- ▶ Security incident reporting
- ▶ Privacy
- ▶ Open door policy
- ▶ Reporting to our ethics hotline/website

Mini-quizzes after each topic assisted employees in staying focused on the training. At the end of the training, each employee had to pass an eight-question test and print their completion certificate. FIS Compliance Solutions' training platform enabled us to keep track of the completion rate of employees for auditing purposes and gave us the ability to send out reminders.

*"Many employees came forward with suggested topics for future articles and ways to improve awareness of our compliance program...We hoped that Compliance Day would open new lines of communication and were pleased that is what it did."*

The newsletter featured an introduction with the purpose of the event, a Compliance Quick Reference section, the winning essay, an article about the importance of data security and how to report a security incident, the ethical quote of the day, an electronic scavenger hunt, and "Compliance Talk." The Compliance Quick Reference section provided an overview of company's expectation of its employees. Each subsequent newsletter will have this section with different information and will eventually be combined for concise employee guidance on multiple issues. The electronic scavenger hunt asked employees questions about FIS policies and directed them to use our Intranet to find the answers. This fun exercise was not only educational, but it drove employees to our Intranet to find the policies

and become more savvy about the location of items housed on the Intranet. “Compliance Talk” featured a Q&A-style format in which our Chief Compliance Officer (CCO) answered frequently asked ethics-related questions and provided additional information about how to report suspected misconduct.

Many employees came forward with suggested topics for future articles and ways to improve awareness of our compliance program. Employees who participated in the electronic scavenger hunt or essay contest, proactively made suggestions, or were the first to complete the training were awarded a mini-flashlight as a prize with a special note from our CCO thanking them for their participation. We hoped that Compliance Day would open new lines of communication and were pleased that is what it did.

### Think to the future...What's next on your menu?

Corporate Compliance & Ethics Week for 2012 is scheduled for May 6–12. Now that you have a basic recipe, your Compliance and Ethics department can capitalize on this by serving up a different theme and message each year. At FIS, we are already planning Compliance Day 2012: Spotlight on Privacy.

Bon appetite! \*

1. SCCE's website, [www.corporatecompliance.org](http://www.corporatecompliance.org), Resources section: Corporate Compliance and Ethics Week.
2. FIS Compliance Solutions is FIS's regulatory compliance software and consulting services arm that serves U.S. financial institutions. It provides risk assessment software, e-learning, instructor-led training, advisory services, regulatory reporting solutions, compliance tools and expert consulting services. For more information, please call 866-355-5150 or email [compliance.solutions@fisglobal.com](mailto:compliance.solutions@fisglobal.com).

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## Don't forget to earn your CCEP CEUs for this issue

Complete the *Compliance & Ethics Professional* CEU quiz for the articles below from this issue:

- ▶ **Nuts & bolts for boards: What ethics oversight really means** by Frank J. Navran (page 44)
- ▶ **Computers and copyrights: A continuing source of avoidable liability** by Thomas W. Kirby (page 59)
- ▶ **Is your ethics and compliance training really preparing your employees?** by Charles Ruthford (page 63)

### To complete the quiz:

Visit [www.corporatecompliance.org/quiz](http://www.corporatecompliance.org/quiz), then select a quiz, fill in your contact information, and answer the questions. The online quiz is self-scoring and you will see your results immediately.

You may also fax or mail the completed quiz to CCB:

**FAX:** +1 952 988 0146

**MAIL:** Compliance Certification Board  
6500 Barrie Road, Suite 250  
Minneapolis, MN 55435, United States

**Questions?** Call CCB at +1 952 933 4977 or 888 277 4977.

*To receive one (1) CEU for successfully completing the quiz, you must answer at least three questions correctly. Quizzes received after the expiration date indicated on the quiz will not be accepted. Each quiz is valid for 12 months, starting with the month of issue. Only the first attempt at each quiz will be accepted.*