

Corporate Compliance & Ethics Week at The Home Depot

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During the week of May 25–31, 2008, The Home Depot Corporate Compliance department participated in Corporate Compliance & Ethics Week. Enterprise-wide compliance broadcasts were sent during the weeks leading up to the events, and a series of events were held during the week.

At the very foundation of The Home Depot are our eight core values:

- Entrepreneurial spirit
- Respect for all people
- Excellent customer service
- Taking care of our people
- Giving back to the community
- Doing the “right” thing
- Creating shareholder value
- Building strong relationships

It was these values that provided the blueprint for the activities that were held in conjunction with Corporate Compliance & Ethics Week.

Entrepreneurial spirit

Our goal was increasing awareness of the Corporate Compliance department, and we decided to utilize Corporate Compliance & Ethics Week as the catalyst to launch departmental awareness and branding. In keeping with our value of entrepreneurial spirit, the

team was allowed to develop our event platform and means of communication without input from senior leadership.

Respect for all people

On Thursday, May 29, The Home Depot associates, members of the Atlanta Compliance and Ethics Roundtable, and compliance and ethics professionals from the Atlanta business community had the opportunity to attend a presentation at the Store Support Center (SSC) our home office. “Global Compliance and Ethics” was presented by The Home Depot Corporate Compliance department, The Home Depot Women’s Link Affinity Group, and The Home Depot Office of Diversity and Inclusion. Dr. Betty L. Siegel, the first woman to head an institution in the 35-unit University System of Georgia, and the longest serving woman president of a public university in the nation, served as the keynote speaker for this event. Dr. Siegel was president of Kennesaw State University from 1981 until July of 2006 and currently serves as President Emeritus, Kennesaw State University and Endowed Chair of the Siegel Institute for Leadership, Ethics & Character.

Dr. Siegel’s presentation addressed not only the need to be compliant in our business dealings, but also the importance of making sound ethical decisions and accepting everyone’s differences while still striving to achieve the same goal. Her point was clearly illustrated by her analogy of teamwork and the trees in the Sequoia National Forest. Dr. Siegel said she once remarked how magnificent the trees looked standing so tall, and that their roots must run deep into the earth. However, she went on to say that she was told the roots are

very shallow and the trees are held together by interlocking roots. This so clearly defines The Home Depot’s value of respect for all people. Just as the trees are able to stand tall and strong, a company can achieve so much more by associates working together and embracing each others differences.

Excellent customer service

As a corporate compliance team, we are not on the frontlines directly providing customer service, but we still have the responsibility to provide excellent customer service to the end users of our corporate compliance products. With this in mind, we hosted a “Lunch ‘n’ Learn” to provide details on how to determine whether you have a conflict of interest; how to avoid awkward gift returns and the proper disposition of unsolicited gifts, and why associates should call the AwareLine, the company’s anonymous reporting hotline.

Taking care of our people

With over 300,000 associates in various locations, both nationally and internationally, we were faced with the task of developing and communicating a message that would be beneficial to both store and non-store associates. To achieve this goal, slides containing a compliance question and the location of where to obtain the answer were developed for broadcast on The Home Depot Television (HDTV). Both store slides and SSC slides were designed to ensure that information applicable to associates’ daily activities was conveyed. These slides were broadcast into the break rooms at The Home Depot stores as well as on HDTV monitors located at the SSC. The slides ran for a week in a continually looping format from May 5–May 25 before being replaced with a new topic.

Additionally, the Corporate Compliance department was featured on the May 19 SamePage Broadcast. SamePage is a weekly

broadcast that is aired live every Monday to all The Home Depot stores. Randy Stephens, Senior Director, Internal Audit – Corporate Compliance spoke briefly on the upcoming Corporate Compliance & Ethics Week activities and fielded a few Compliance standard operating procedures (SOP) questions along with members of the SOP Team.

Giving back

The Home Depot is known for its various community partnerships and as a Corporate Compliance department, we wanted to capture this same spirit of giving back. We reached out to our community of over 6,000 associates at the Atlanta SSC by holding a Corporate Compliance “Meet and Greet” where the Corporate Compliance department (along with The Home Depot’s lovable mascot “Homer D. Poe”) shook hands, answered a few questions, and distributed over 2,500 Corporate Compliance department brochures and apron badges with our message of “Prevent, Detect, Respond.”

Doing the “right” thing

Corporate Compliance is the embodiment of the value: Doing the “right” thing. This was clearly evident during our Corporate Compliance & Ethics Week activities. From ensuring our messages were tailored to meet the needs of the company’s diverse population to the selection of events and topics of discussion that would appeal to associates at every level of the organization, doing the “right” thing was always at the forefront of our minds.

Creating shareholder value

Communicating the message of corporate compliance is one way we create shareholder value. Keeping corporate compliance top of mind for all associates is key in continuing our success as a retailer. Our schedule of events was announced through various communication channels, including elevator post-

ers, lobby easels, the company’s weekly communication newsletter, and a company-wide communication from CEO, Frank Blake. We also sent out personal e-mail invitations to our internal business and legal partners and external corporate compliance colleagues, inviting them to the week’s events.

Building strong relationships

To be truly successful, an organization should have strong relationships both internally and externally. In keeping with this value, we partnered with The Home Depot Women’s Link Affinity Group and The Home Depot Office of Diversity and Inclusion to ensure that we were meeting the needs of all associates. We continue to forge our relationships with our business and legal partners, so that the message of corporate compliance can be spread throughout the organization and to enhance our network with compliance and ethics professionals from the Atlanta business community.

The Home Depot, Inc. (NYSE: HD) was founded in 1978 with its first store opening on June 22, 1979. We now have more than 2,200 retail stores in the U.S. (including Puerto Rico, the US Virgin Islands, and the Territory of Guam), Canada, Mexico, and China. The Home Depot is the world’s largest home improvement specialty retailer and the second largest retailer in the United States. The Corporate Compliance department is comprised of three groups:

- The Corporate Compliance Team, who work alongside business and legal partners to develop, implement, and monitor corporate compliance policies,
- The Standard Operating Procedures (SOP) Team, who (along with business and legal partners) develop store-level compliance-related SOPs, and

- The Records Management Team, who (in partnership with all businesses throughout the enterprise) maintain and oversee the retention, retrieval, and destruction of documents. ■

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- **Achieving employee ownership of your ethics and compliance program: Easier said than done!** — By Dorothy Henley on page 4
- **Why smart leaders do dumb things** — By Patrick J. Kuhse on page 30
- **The role of a professional coach in corporate compliance and ethics** — By Sally Rhys on page 39

To obtain your CEUs, take the quiz and print your name at the top of the form. Fax it to Liz Hergert at 952/988-0146, or mail it to Liz’s attention at SCCE, 6500 Barrie Road, Suite 250, Minneapolis, MN 55435. Questions? Please call Liz Hergert at 888/277-4977.

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