



101 Business Ethics: Implementing a Global Code of Conduct

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Ruth Steinholtz is general counsel & group security coordinator for Borealis A/S, a leading provider of innovative plastics solutions. She is responsible for the global legal department, which she has rebuilt. Ms. Steinholtz and her team have developed and are in the process of implementing a revised ethics policy.

Prior to joining Borealis, she held the positions of European general counsel and global incident management coordinator for Allergan, Inc. and of region counsel for Cadbury Beverages Europe. Ms. Steinholtz began her in-house career with Cadbury Beverages Europe (originally in Barcelona) and prior to that was in private practice as a corporate lawyer. She started as an associate in San Francisco with Graham & James and was transferred to the Milan office in 1982. Since then, she has lived and worked Europe and the Middle East. Ruth spent approximately three years in the Cairo office of Baker & McKenzie.

Ms. Steinholtz graduated from the University of Colorado at Boulder (B.A.) and the University of San Francisco School of Law. She also is a fellow of the Salzburg Seminar, and attended the University of San Diego School of Law Summer International Law programmes in Guadalajara, Mexico and Paris.



SHAPING the FUTURE with PLASTICS

Implementing a Global Ethics Policy

By
Ruth N. Steinholtz

You have just been asked by the CEO of your company to come up with an ethics policy or revise an old one written years ago. He or she wants the policy to be applicable globally. Your first impulse (after the panic subsides) is to read the ethics policies of your competitors, customers and suppliers and then pick up your "pen" and start writing. You figure you can write it, have it checked by outside counsel, and then publish it on your companies' intranet site in a couple of months. Is this the best way to proceed?

Most certainly not, if you want anyone to pay attention to the policy once it is published. You may also find that this method results in its being unenforceable or unable to be implemented in certain countries. The process leading up to the adoption of the final document is as important as the document itself to its ultimate acceptance by the companies' employees. If they feel that the policy was imposed upon them by the Legal Department, or Corporate, or whatever "them" they see as not part of "us" it will not succeed. So, what do you do?

First, you look around for opportunities to take soundings before you even think about putting pen to paper. I don't like the words "focus groups" but the concept is one which could be used in this context. Some companies have collaborations with business schools where projects are undertaken as part of the executive management development programme. This is the perfect opportunity to do some pre-work. The Courage to Lead programme Borealis runs together with IMD gave us a chance to begin the task of listening to the organisation. In addition, the managers participating in the project themselves were valuable possessors and transmitters of corporate culture, capable of reflecting the views and concerns of the larger audience. These people need not know anything at all about Ethics Policies, specifically or in general. They do not need to be lawyers. In fact, we recommend that only one member of the team have any expertise whatsoever in the area. The rest will be microcosms of the employee population. And, they will be creative, knowledgeable and interesting people who will be helpful ambassadors for the project in its later phases.

Even if your company does not have a formal management development programme, you can form a small team (5-7 people will be adequate, no more than 10 depending on the size and geographical reach of the company. You will want people from a representative sample of the company, in terms of geography, function and level (including junior non-managers if possible). Together, the team should define the scope of the project with the sponsor, who should be a senior manager, preferably a member of the Executive Board. Do not include actually writing the policy within the mandate of this team. Make this clear from the outset. Different expertise will of course be required to actually write the document. More on that later.

The team can work in various ways. One possibility is to develop a questionnaire to be circulated widely (again to a representative sample of employees) and to follow the questionnaire up with face to face interviews. We strongly recommend not relying solely on the printed word and email to generate this feedback. The team will want to sit down face to face with people and hear directly from them what issues they are confronted with in their work; what their concerns are; and what suggestions they have on the procedural side as well. By that we mean, what do they want the document to look like, do they have any



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preferences or suggestions for implementation, including training programmes, help lines (be prepared for lots of negative feedback on these), etc. In other words, this is a fact and emotion finding process to give you information which you can use to craft the policy and the implementation programme. Do not short change it by relying on busy people to write down meaningful information.

The Borealis Ethics Team found out many interesting things during this process. Some of the things we heard were:

- We'd like one document incorporating all related information (in the past we had a policy and guidelines and it was difficult to understand the interaction between the two)
- We'd like more guidance on how to deal with ethical issues, and resources beyond a document in case we do not know what to do
- We are not too keen on a whistleblowing line, because it smacks of collaboration and spying and besides we are an ethical company so we do not need it
- We think ethics is important and we are very supportive of this project

These are just some of the many things we heard from our colleagues. At the end of the fact/attitude finding phase the team got together and wrestled all of the feedback into categories in order to make sense of it. We used a "meta plan" process to do this in one afternoon, with lots of yellow stickies and flip charts. This was one of the most important afternoons we spent together as a team, because it helped us to clarify our own thinking. The categories of information we received were related to the various sections one would expect to find in an ethics policy as well as numerous suggestions regarding format and implementation.

The members of the team by this time had also read quite a bit individually about ethics, and had looked at the ethics policies and codes of conduct of many companies. In this way, they became knowledgeable and were a useful sounding board and incubator of ideas. The fact that they came from different functional and operational perspectives meant that they possessed diverse skills and points of view. The result was a series of meetings and discussions which produced a recommendation for an "ethics excellence process and an implementation plan. This was one of the most important contributions of the Team. In addition, they synthesised and digested all of the feedback from employees into a form useable by the eventual authors of the policy.

One of the most important functions of the Team's work was one that they were perhaps not aware they were performing. It was to give legitimacy to the policy and implementation plan that emerged at the end of the project. This was crucial because it was a departure from past practice. It was important to be able to show that the changes were the result of a concerted effort to listen to employees at all levels and to reflect the company's culture in the revised Ethics Policy. People will generally resist change, even if they do not particularly like the status quo. They are more likely to accept it when they see it as coming from within. This may be obvious but how often do managers forget it when introducing a new procedure?

Another important result of the first phase described above is that it will give you a warning if there are likely to be issues with the final document. You can then prepare for any opposition or controversy you know you will encounter; marshalling your arguments more carefully in those areas. In the case of Borealis it was the need to initiate a help line that we knew would provoke the most concern, based on the feedback we received during Courage to Lead. Particularly in the Nordic countries, the concept of whistle-blowing had very



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negative connotations. So, we were able to design the QuestionLine around these concerns and to reassure people about its purpose and utility. We made it more of a source of information when reading the Policy itself did not answer a question, and we staffed it internally to enhance its profile. Although anonymous submissions can be made, they are discouraged and most means of contacting the QuestionLine require the employee to identify themselves. This has lessened the concerns around the line.

The time spent up front before you write a word of the Policy will result in better acceptance when it is published. The second way of ensuring this is to widely circulate drafts both internally and externally to selected advisors during the writing process. I will say more about the need for external advisors later in this article. In this stage, you will be asking for written comments from middle and senior managers in key positions. Depending on your corporate culture you may wish to meet with some of them to go through the draft to ensure that it has been read and understood. Finally, when seeking approval from your Executive or Supervisory Board or Board of Directors, it is important to explain the process of listening to the organisation that you went through before reaching the point of writing the document. We prepared a Q&A which we circulated as pre-reading to the Board along with the final draft policy. It contained both a description of the process and answers to some of the obvious controversial questions which we thought they would ask. This short circuited a lot of discussion and satisfied the Board that we had really thought things through from many perspectives. It was a winning formula.

It goes without saying that you have to be willing to compromise and to incorporate suggestions from many different people in order to gain acceptance in this way. Working by consensus is a feature of some companies more than others. In this context, however, you are asking employees to adopt behaviours and attitudes which may not be entirely familiar to them. They therefore need to understand the reasons behind the requirements. The dialogue that develops around the process I described above has the effect of raising people's awareness of the importance their individual actions have to the reputation and success of the company. It is a mutual learning process which is actually the beginning of the implementation, even before the Policy is written.

Ideally of course the Policy will be related to the company values and it will have to be written to comply with law. The legitimacy you will gain from being perceived as listening and adapting will carry you through the areas where you feel you must impose a certain approach because of legal requirements. You will encounter less resentment in my experience because your obvious attempt to understand others will make them more interested in understanding you. This greater openness should spill over into other areas of the Legal Department's work later. That is why it is a good idea to keep the majority of the drafting and the process of guiding the draft through the revision stage inside the Legal Department.

I cannot underestimate the importance of producing not only the Policy but all of the presentation material used in training sessions in as many languages as are spoken in your company. It is very hard work and can be rather expensive to do but it is worth every Euro cent. Giving people the opportunity to discuss and debate the dilemmas they encounter in dealing with ethical issues in their own language is crucial to drawing them out and making sure they really understand what you are asking of them. Take the time with the translations to make sure that you are giving the same message in each of the languages, and make sure you stay away from controversial words which can crop up in translations.

In a sense I have jumped ahead because you will be consulting with local legal advisors in parallel with the process described above. If you are a listed company subject to the



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Sarbanes-Oxley Act (SOX) your options will be limited by that fact, and you will need to comply with US law, but you cannot afford to ignore the national laws of other jurisdictions in which you operate. Whether you are subject to SOX or not, a review of the relevant laws and regulations your company must comply with is essential. Anti-bribery legislation has been implemented in many European countries and the law may have changed since your company's original ethics policy was adopted. In any event, do not make the mistake of believing that if you are compliant with US law, the policy will work everywhere.

It would be remiss of me not to mention the issues related to whistle-blowing lines and ethics policies which have surfaced in France, and for different reasons, Germany. Numerous articles have been written on this subject so I will not go into detail here. Suffice it to say that Sarbanes Oxley compliant whistle-blowing lines have been found to conflict with French Data Protection rules by the CNIL (French Data Protection Agency). The CNIL has recently issued guidelines on this subject with the goal of insuring compliance with French law and international regulations. In a German labour court Wal-Mart ran afoul of German law after it unilaterally imposed its ethics policy without prior consultation with the works council. These cases reinforce the need to obtain local advice prior to adopting the Ethics Policy. You are certain to have to consult with works councils in various European countries beforehand. Wait until after you adopt the Policy and it will be too late to avoid complications.

Once you get to the implementation phase you will have to decide how quickly you wish to roll it out, and how far down the organisation. It is recommended that everyone receive a copy of the Policy (and acknowledge receipt) however how you do this will depend to some extent on the labour laws of the countries you operate in. In many countries, the Policy will have to become a part of the employee's contract in order to be enforceable. So, work with local counsel and your HR departments to determine the requirements. In this phase, one size does not fit all.

This article has meant to give you some guidance with regard to the implementation and development of a global ethics policy. It is a fascinating task which will allow your legal department to get to know your company and the environment in which it operates, better. You can also use it as a means to give lawyers exposure to parts of the company overseas that they rarely see. Your ultimate success measured by the acceptance of the policy throughout the organisation will be directly proportional in my opinion, to the time you spend developing it. Enjoy the journey.

Ruth N. Steinholtz is General Counsel and Group Security Coordinator for Borealis A/S and can be reached at Ruth.Steinholtz@Borealisgroup.com. The opinions stated in the article are her own.

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Some European Reactions to Sarbanes-Oxley Codes of Conduct and Whistleblower Hotlines

Paul Smith, Eversheds LLP
15 May 2006



What does SOX actually require in Europe?



European reactions to SOX, US-style codes of conduct and hotlines have been mixed but are becoming more predictable



The UK experience with US-style codes of conduct and hotlines



The French experience with US-style codes of conduct and hotlines



The German experience with US-style codes of conduct and hotlines



The proposed EU Working Group 29 response to US-style codes of conduct and hotlines



Conclusion:

- Codes of conduct seem to be here in Europe to stay, but local business and social customs and local knowledge must always be taken into account.





ACC- Europe Panel Discussion Implementing a Global Code of Conduct

Donna Boehme, Group Compliance & Ethics Officer
BP plc
Athens, 15 May 2006

BP Scope and Scale

BP is an oil, gas, petrochemicals and renewables company

Around 102,900 employees

Operations on 6 continents and in over 100 countries

...market capitalisation \$215 billion (on 28 April 2005)

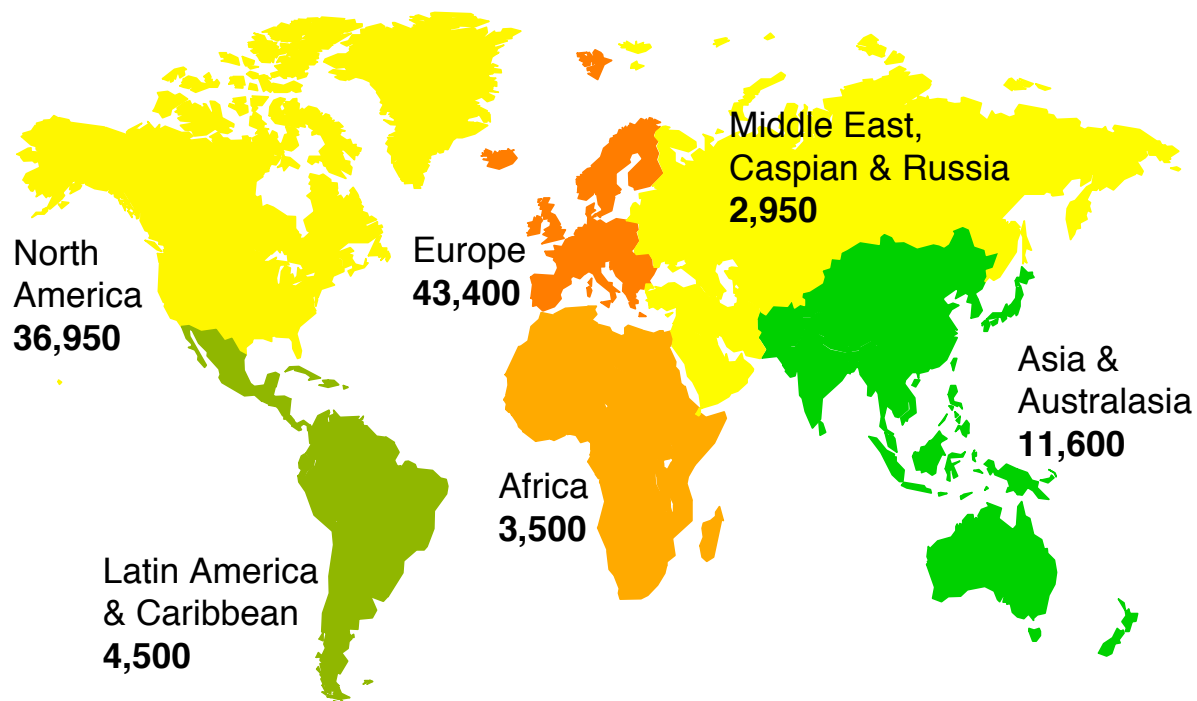
...annual revenues/turnover of \$285 billion (in 2004)

...the 2nd largest oil & gas company and one of the 10 largest companies in the world

...with approx 30,000 service stations worldwide

...serving 13 million customers every day

Where BP employees are located



Challenges of developing a global programme

- Diversity of cultures, businesses, people & languages
- Different legal (and ethical) standards
- Perception of just another initiative from HQ
- Incorporating input from other functions (HR, Legal, Audit)
- Creating engagement and ownership in the line
- Creating individual engagement
- Making it meaningful/keeping it fresh
- Helplines & privacy issues
- Consistent enforcement

BP Code of Conduct

- Launched globally on 15 June 2005
- Communication to 100,000+ employees
- 10 + 24 languages
- Live on BP external and internal websites
- Code video, also translated
- Global employee concerns line “OpenTalk”
- Robust training & communication plan



The Code is the centrepiece of BP's compliance and ethics programme

CEL Network – the engine

- 125+ senior leaders in every segment, region, function
- Mostly part-time, some fully dedicated (eg Angola, Retail)
- Trained in a series of CEL Leadership Events
 - Berlin (pilot), London, Istanbul, Beijing, Chicago, Houston, Melbourne
- Delegated authority to lead c & e activities
- Starting with rollout of Code of Conduct

"Compliance and ethics leaders are getting very direct development in the most important part of leadership...it is at the centre of leadership"

"All members of the group leadership... will be evaluated on how well they live the values of the company as leaders and how well they live the code of conduct and influence people to abide by that Code of Conduct."

- Lord John Browne, Group Chief Executive 2005

Employee Dialogue Sessions (20)
November 04



Preparing the way- the significance of the “Soft Launch”

- Engaging senior leadership
- Training & preparing CEL network
- Engaging and training key “front lines” networks (HR, Legal, Control, Audit, Security)
- Preparing & training Functional Owners network
- Preparing OpenTalk response teams
- Preparing team leaders
- Preparing GC&E team

Creating a state of readiness throughout the BP group

The results- 1 year later ...but it's just a start

"The real endeavour is to communicate what the Code means to each individual employee...to embed this Code in the "DNA" of BP."

Donna Boehme, 15 June 2005

2005 Group milestone: to communicate the Code to all employees

- **99%** awareness confirmed by independent survey
- Approximately **5,000** awareness sessions held
- Distributed to over **100,000** employees
- Downloaded over **7,000** times from the BP website
- a record in BP history
- Code video viewed online **3,500** times

Other elements of BP programme

- Job (risk) related targeted training
- Compliance risk management & tools
- OpenTalk global employee concerns line
- Annual compliance and ethics certification
- 25% of Group leader bonus tied to Code behaviours
- Code values incorporated into 360's
- Quarterly reporting to Board

“All members of group leadership will be evaluated on how well they live the values of the company as leaders and how well they live the code of conduct and influence people to abide by that code of conduct. ..It is at the centre of leadership. ”

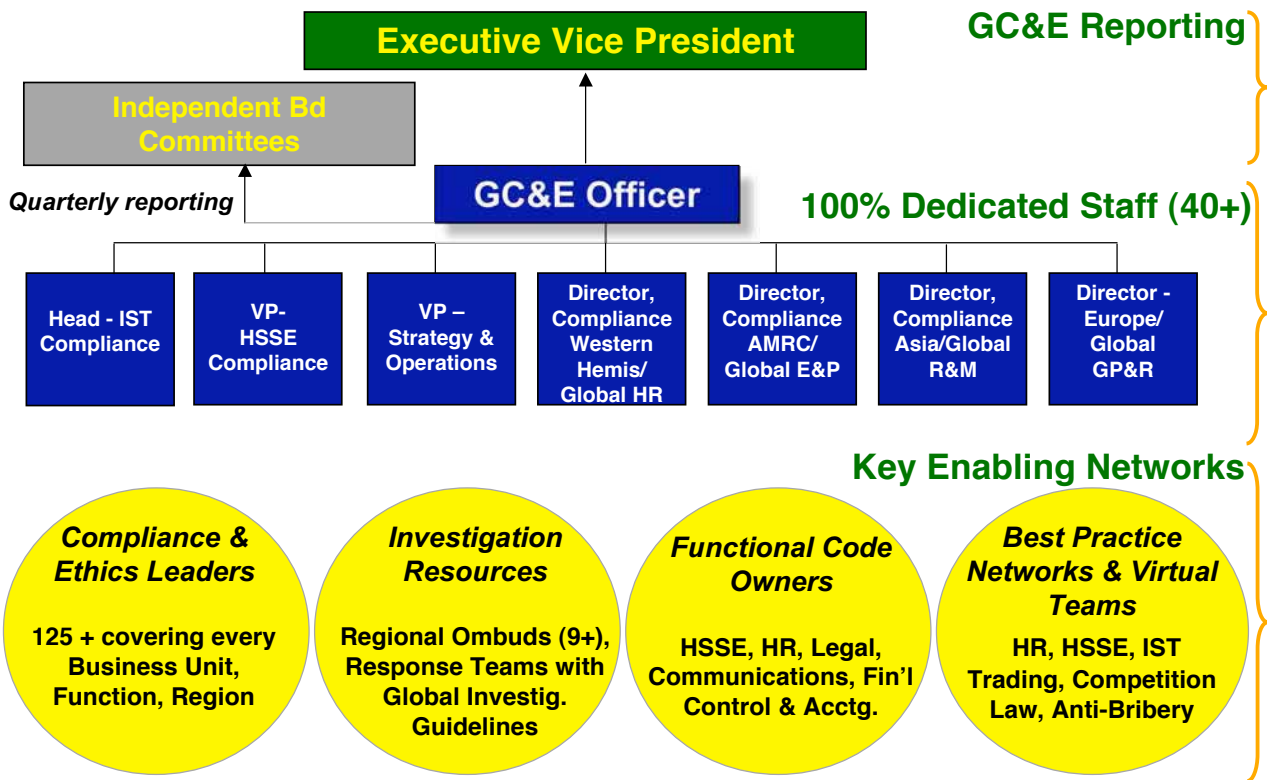
- Lord

Browne

Some BP solutions – some a work in progress !

<p>Diversity of cultures, languages, etc</p>	<p>Different legal and ethical standards</p>	<p>Perception of just another HQ initiative</p>	<p>Input from other functions</p>
<ul style="list-style-type: none"> • Translations of Code into 34 languages • Translations of many tools into 10 core languages • Diversity on Code video • 20 Employee Dialogue Sessions 	<ul style="list-style-type: none"> • 20 Employee Dialogue Sessions • Clarity about single universal Code • Higher local standards apply 	<ul style="list-style-type: none"> • Early engagement of team leaders and opinion formers • Lord Browne active involvement and quality of launch events • Messages about individual accountability • Integration into regular business activities 	<ul style="list-style-type: none"> • Development of enabling networks • Engagement of functions as owners of Code sections
<p>Engagement & ownership in the line</p>	<p>Creating individual engagement</p>	<p>Making it meaningful</p>	<p>Consistent enforcement</p>
<ul style="list-style-type: none"> • Compliance and ethics leaders network • Business leaders engaged to lead workshops, town halls 	<ul style="list-style-type: none"> • Targeted messaging about individual accountability • Making Code and tools easy to use and understand • Encouraging creative engagement 	<ul style="list-style-type: none"> • Real life scenarios in awareness training • Encouraging open discussion about grey areas 	<ul style="list-style-type: none"> • Investigation & disciplinary guidelines • Performance alignment

Group Compliance & Ethics – Global Structure



ACC – Europe
Panel Discussion

Implementing a global code of conduct

Ruth Steinholtz
Borealis
Athens, 15 May 2006

Who we are

- 40+ years of heritage in polyolefins
- State-of-the-art multimodal Borstar® PE & PP technology
- 63 new product launches in 2006
- EUR 5 billion sales revenue
- 4,500 employees in 11 countries
- Four European hubs
- Expanding in Middle East and Asia
- Ownership
 - 65% IPIC of Abu Dhabi
 - 35% OMV of Austria

Strong in Europe; Growing in Middle East/Asia



Successful implementation starts before the Policy is even drafted

- Listen to the organisation before you put pen to paper
- The company values provide your foundation: go from there
- Do not need ethics experts to accomplish this task, use them as guides through the process
- So, don't let "lack of dedicated resources" be an excuse
- Borealis has trained 45 Ethics Ambassadors to assist in training

Top 10 Mistakes

Top 10 Mistakes Organisations Make in Developing Global Ethics Programmes

1. Lacking consensus on the objectives for globalization
2. Not **integrating international personnel** into the **development process**
3. Discounting the importance of promoting the programme as a competitive advantage
4. Not establishing ethics offices or **resources in international locations**
5. Basing company policies on legal requirements in the domestic market
6. Appointing headquarters staff or expatriates (i.e. non-International employees) to fill ethics positions
7. Offering training materials only in English
8. Using the word 'ethics' extensively in programme materials
9. Translating the code without translating the code
10. **Focusing** on the few cultural differences rather than acknowledging the many **cultural similarities**

Source: International Business Ethics Institute

text

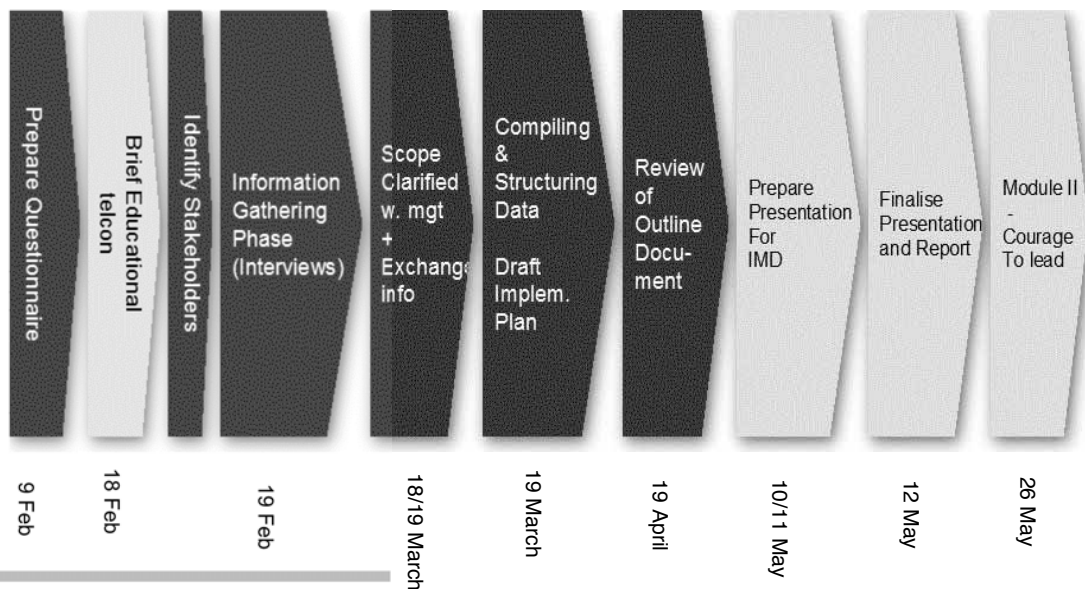
"Expecting an ethics policy to have any effect when no training is provided really does not make any business sense."

Simon Webley,
Institute of Business Ethics

Borealis took advantage of its IMD Courage to Lead Programme: Team Charter

- Do the groundwork for the development of a new Borealis Ethics Policy building upon Borealis' Values; which is clear, easy to understand and to use.
- Our aim is to provide Borealis employees with a clear set of principles, together with the guidance and support they require in order to resolve the ethical dilemmas they may face in their work. In addition, the Policy will contribute to external stakeholders confidence in Borealis' ethical standards. For this reason, the Policy will be published on Borealis' website.
- We will also develop a draft implementation plan, including appropriate training for all users and communication to internal and external stakeholders to introduce the new Policy.

IMD Code of Conduct project



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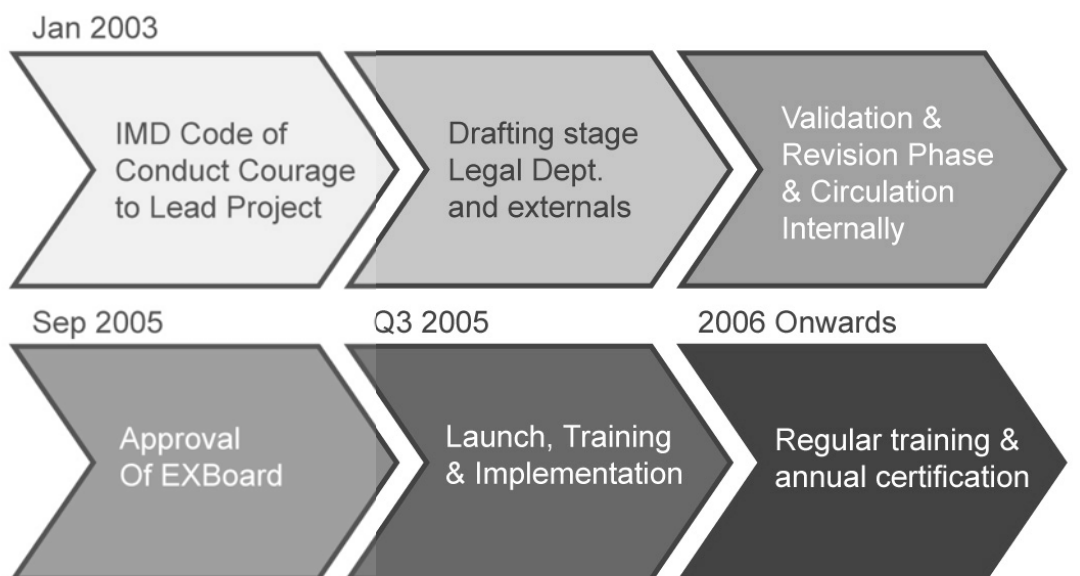
Page 8
17.02.2005
Reference

Sponsor Check

**Questionnaires & interviews in 12 locations,
involving 15 nationalities, covering all BU's,
Functions & Sites**



Development – The Overall Process



Implementation – Actions 2005-06

- | | | | |
|--|--------------------|-----|------|
| • Exboard Final Sign Off | September | ✓ | |
| • Presentation to Supervisory Board | November 9 | ✓ | |
| • Ethics Ambassadors Training | September 20 | ✓ | |
| • CCC Meeting | September 22 | ✓ | |
| • Local Works Councils Meetings | October | ✓ | |
| • Initial Distribution of Ethics Policy | Late October | ✓ | |
| • Official launch at Senior Leaders Meeting | November 14 | ✓ | |
| • Certification level 7+6 | December | (✓) | |
| • Training and Workshops for all levels | January - December | | 2006 |
| • Continued distribution (in connection with training) | January – December | | |
| • On-line Ethics Training begins | June 2006 | | |
| • Certification level 4,5,6,7 (and selected others) | December | | |
| • Continuing 2 year training cycle | Forever! | | |

Ethics Pack



Framework for Making Ethical Decisions

For the occasions on which an issue or situation arises which falls into a 'grey area', use the following 'Framework' to guide your thinking



Recognise that you have an ethical issue in the first place
Are you being asked to do something that you think may be wrong?
Are you aware of potentially illegal or unethical conduct by a colleague, customer or supplier?



Think before you take any action
Summarise the issue you believe you are facing. Is it clear?
Ask yourself, why is this a problem?
Consider what your options are.
Review all of the relevant facts and considerations.
Could anyone else be affected?
Consult with others as appropriate
– ask for guidance from the Legal Department.



Decide what course of action to take
Re-read the Ethics Policy.
Consult others as outlined elsewhere in the Ethics Policy.
Are there any legal or fiscal considerations?
Assess the risks and how they could be minimised.

Once you have formulated your decision:



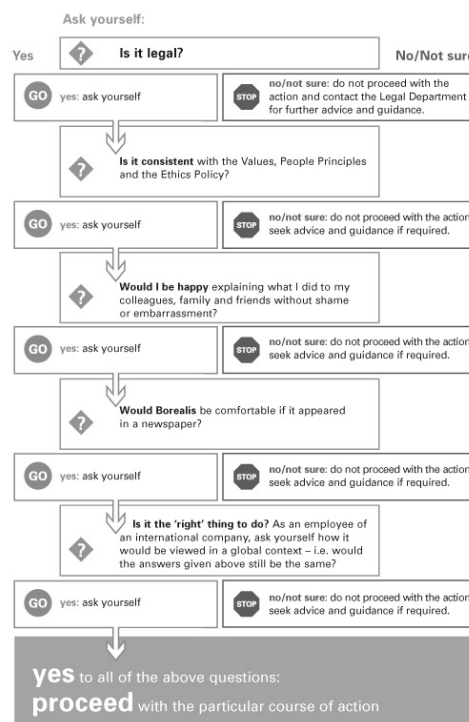
Test your conclusion
Apply Borealis' Values to your decision – are they aligned?
Consult others – go back and discuss it again, one last time.



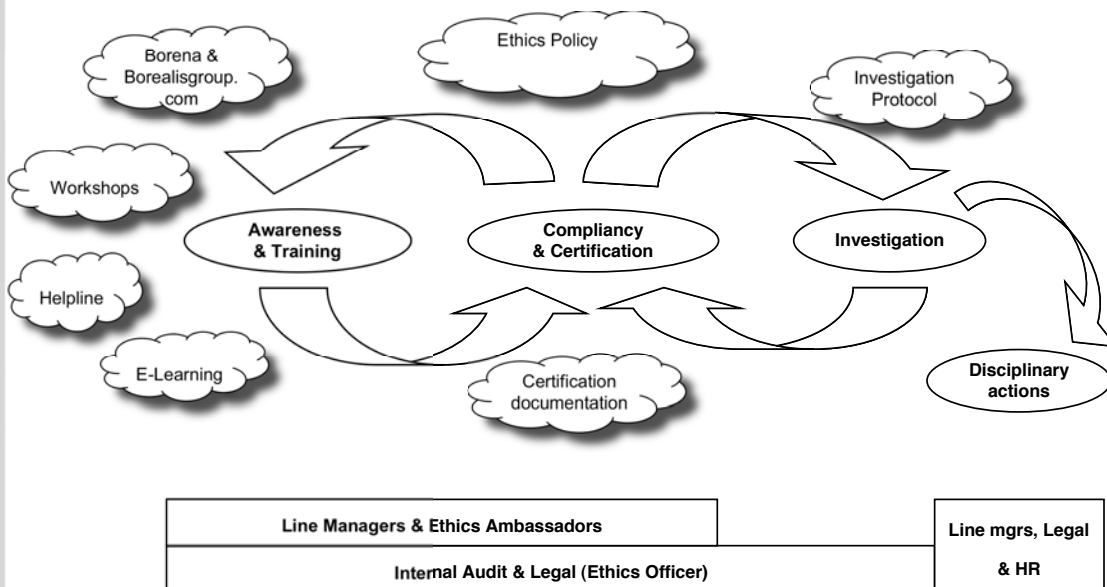
Proceed
Communicate your decision and rationale appropriately. Ensure changes are made to standard operating procedures where relevant.

Decision Tree

Use the Decision Tree to help you decide whether a course of action is correct when you cannot otherwise find the answer in the Borealis Ethics Policy



Managing Ethics Going Forward



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Case Story

Ron Unstoppable

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Reference



% of employees trained by BG

Reporting date: 10/05/2006

• Business Group	Employees	Trained	%
• Business Support	278	38	13,67%
• Human Resources & Public Affairs	96	22	22,92%
• Hydrocarbons & Projects	193	14	7,25%
• Innovation & Technology	322	17	5,28%
• Operations & Procurement	3002	96	3,20%
• Polyolefins	800	139	17,38%
• TOTAL	4693	327	6,97%

text

"I am very impressed
by the way in which
the Ethics Policy was
developed and
implemented in
Borealis. It shows that
Borealis takes ethics
and the control
environment
seriously."

Torben Kristensen
Partner, KPMG, Denmark

% of employees trained by Location

Reporting date: 10/05/2006 (1)

• Location	Employees	Trained	%
• Barcelona	15	0	0,00%
• Beringen	463	3	0,65%
• Burghausen	126	0	0,00%
• Croatia	1	0	0,00%
• Czech Republic	1	0	0,00%
• Duesseldorf	54	1	1,85%
• Itatiba	78	0	0,00%
• Kallo Kieldrecht	162	0	0,00%
• Kongens Lyngby	77	29	37,66%

% of employees trained by Location

Reporting date: 10/05/2006 (2)

• Location	Employees	Trained	%
• Linz	200	0	0,00%
• Mechelen	246	34	13,82%
• Monza	80	40	0,00%
• Poland	4	0	0,00%
• Rockport	115	100	86,96%
• Porvoo	865	145	16,76%
• Romania	1	0	0,00%
• Rönningen	508	5	0,98%
• Rungis	6	0	0,00%

% of employees trained by Location

Reporting date: 10/05/2006 (3)

• Location	Employees	Trained	%
• Russia	4	0	0,00%
• Schwechat Mannswoerth	532	5	0,94%
• Stenungsund	1012	5	0,49%
• Triunfo	45	0	0,00%
• Turkey	5	0	0,00%
• Wilmslow	6	0	0,00%
• Zwijndrecht	87	0	0,00%
• TOTAL	4693	327	6,97%

Legend

Reasonably effective
Very effective
Not effective

Frequency of Antifraud Methods

Effectiveness of Antifraud Methods



ACC – Europe

Panel Discussion

Implementing a global code of conduct

Wolter Kymmell

Flexsys

Athens, 15 May 2006

ACC-E Athens 2006

Some facts and figures (1)

	1987	1991	1998
	in %	in %	in %
Have Public Code	13	37	68
CEO	80	78	95
General Counsel	41	78	92
Board of Directors	21	41	78
Consultants	2	10	15
HR	N/A	69	86

US more instrumental vs EU more values based

ACC-E Athens 2006

Some facts and figures (2)

Topics addressed (1998)

• Bribery:	92
• Conflict of interest:	92
• Confidential information:	92
• Receiving gifts:	90
• Equal opportunity:	86
• Giving gifts:	84
• Environment:	78
• Antitrust:	76

FLEXSYS

- Flexsys: Rubber Chemicals
- 50/50 J.V. Akzo Nobel - Monsanto
- < \$ 1 Billion turnover
- Global presence, global business
- Only ± 1,000 employees
- Host-guest relationships

ACC-E Athens 2006

The process

1. Define objectives
2. Define core values
3. Implement
4. Maintain focus

ACC-E Athens 2006

Objectives

Compliance	vs	Integrity
External standards	Ethos	Self imposed
Compliance	Why	Responsible conduct
Lawyer driven	Who	Management
Obligation	Aim	Aspiration

ACC-E Athens 2006

Example: Case 1

Employee receives by mistake sensitive and very useful information, from competitor.

Your advice:

- Is o.k., don't worry, share info with Business Team
- Send it back, make limited use
- Destroy it, do not use it
- Inform sender, ask for instructions

ACC-E Athens 2006

	Integrity heart	Sound judgement head
Individual You !	Personal Character	Decision making skills
Organizational Flexsys!	<ul style="list-style-type: none"> • Tradition • Values • Leadership 	<ul style="list-style-type: none"> • Policies • Practices • People

ACC-E Athens 2006

Challenges

- Develop global values
- From principles to practice
- Cynicism
- Resolve conflicts

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Some personal views

- Empowerment
- Personal leadership top
- Face-to-face
- K.I.S.S.
- Local involvement
- Create missionaries

ACC-E Athens 2006

Flexsys Core Values at a Glance

Honesty

ESH

Accountability

Respect

Trust

ACC-E Athens 2006

Example: Honesty

- Demonstrate honour in principles, intentions and actions by being:
 - Open
 - Truthful
 - Unbiased

- Evidence of Honesty
 - Informed workforce via upward/downward communication
 - Promises are kept
 - Questions are asked
 - Constructive feedback is sought, given and used effectively
 - Barriers to success are recognised and removed

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What do others do?

- Surveys
- Ombudsperson / compliance officer
- Communicate regularly
- “Case of the month”
- Publish Global code of conduct
- Short briefings / work-shops
- Training and education
- Use symbols
- Hot-lines
- Involve stakeholders
- Local involvement / champions
- Make part of Bonus / appraisals
- F.A.Q. on intranet
- Integrate in team meetings

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What did we do?

- Communicate
 - Site visits
 - Symbols
 - Video "Delivering the Vision"
- Educate
 - Focus groups
 - Luncheon discussions
 - Game
 - Presentations
- Lead by example: How?
- Move to behavioral change globally

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The six questions

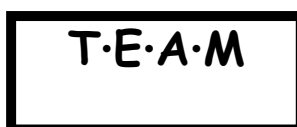
1. Why is this bothering me?
2. Who else matters?
3. Is it my problem?
4. What is the 'core value' concern?
5. What would others think?
6. Am I true to myself?

*“Always do the right thing.
This will gratify some and astonish the rest.”*

Mark Twain

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Towards Excellence
And More



Towards Excellence
And More

KEY BEHAVIOURS	PRIORITY BUSINESS ISSUES (over the next 3 years)
1) ACCOUNTABILITY/RESPONSIBILITY - hold yourself and others accountable for commitments. - take responsibility for achieving excellence in everything we do, even outside your strictly defined accountabilities.	1)
2) HONESTY AND CHALLENGE - speak up when you see something you know is not right. - if it doesn't work speak up again. - don't be afraid to challenge people - we can't put personal comfort before the success of Flexsys.	2)
3) RISK-TAKING AND ENTREPRENEURIAL BEHAVIOUR - treat the company as if it were your own (we are a small company). - try to question the status quo & don't be bound by unwritten rules. - think "out of the box".	3)
4) DECISION-MAKING AND COMMUNICATION - seek clarity and effective closure in all discussions & decisions. - ensure you understand what's being said and make sure others do.	4)
5) SELF-IMPROVEMENT - the company can only improve if we improve as individuals. - seek feedback on your performance and behaviour. - make discussing performance an integral part of managing yourself and those who work for you.	5)
6) FUN AND TEAM SPIRIT - try to embrace the above points with enjoyment and good humour. Help create a lively energetic and strong team spirit.	