

ENCOURAGING A SPEAK-UP CULTURE

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CREATING A SPEAK-UP CULTURE THROUGH OPEN COMMUNICATION

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AVOIDING CULTURE CLASH

The 'speak up' culture cannot go against the local labour relations culture

To be successful, it needs to blend in / surf the existing cultural trends

Don't equate 'speak up' to 'whistleblowing scheme'

Only present 'speak up' as a component of work place business ethics / good governance

BE PREPARED TO EXPLAIN

Be transparent & concrete:

What do you expect people to do?

What do you do with the reported information?

When are reported issues escalated?

What happens when they are escalated?

How does the company ensure that employees who speak up are not retaliated against?

How does the company manage abuses such as reports made in bad faith?

EXPLAIN, EXPLAIN, EXPLAIN SOME MORE

Involve other functions in passing on the message and in the processes:

Commitment by top management is key

Inclusion of HR and local/operational management is just as critical

MEASURE AND MONITOR... AND KEEP EXPLAINING

Look at the stats from the helpline, but not only

Consider including questions about 'speaking up' in the anonymous employee survey

Never stop explaining what you expect from people, always in the broader context of ethics in the workplace

SYNGENTA'S SPEAK-UP PROGRAM

Roman Mazzotta

Head Group Compliance and Trade Affairs

Syngenta

Compliance matters – Syngenta approach

Syngenta compliance program builds on two pillars to enable sustainable growth

- Ambitious compliance framework
- Strong compliance mindset & culture

Compliance framework

Compliance and Risk Management Committees (CRMC)
Global standards and policies
Standardized control and monitoring processes

Compliance mindset & culture

Ethics and integrity as an integral part of every-day decision making
Leaders taking accountability – tone at the top
Employees feeling responsible – speak-up culture

Securing our License to Operate
Enhancing our Freedom to Operate

Enabling sustainable growth

Mindset & Culture – compliance journey



Compliance helpline – key facts



- Syngenta encourages employees to raise concerns and questions with their line managers, the Compliance department or HR
- Syngenta also offers a compliance helpline
- Available in 24 languages, 24 hours a day, 7 days a week
- Operated through an external provider
- Concerns and questions can be raised via telephone or be submitted online
- Investigations follow a clear process which is available on the Policy site

Mindset & Culture – Speak-up culture campaign

Syngenta speak-up culture campaign is based on 3 key elements:

- Compliance program and communication is **based on Syngenta values** and not on rules and regulations
 - role of corporate culture is key
 - focus on key areas of compliance («don't try to cover all»)
 - internal policies written from a user and not an expert perspective
- Emphasis on **role of leadership** in compliance
 - leaders have the accountability to create the right environment that encourages employees to speak-up
 - leaders have to act as role model – their behavior sets the bar for others
- Making ethical behavior and commitment to compliance a **personal responsibility** for all employees
 - employees shall engage with team colleagues and line managers in open conversations about compliance risks and opportunities

Mindset & Culture – Speak-up culture campaign

Enabling leaders and employees to be successful:

- online compliance resource center



- allowing people to access compliance relevant information 24/7
- contains Compliance Communication Tools Guide and Compliance Material Time Guide for proper planning of ethics and integrity sessions
- Ethical leadership guide provides practical advice on how to deal with day-to-day managerial responsibilities

- engagement sessions



- Compliance team are running F2F engagement sessions for leaders and employees
- Managers are asked to run annual leader-led compliance sessions with their teams
- Compliance relevant stories are regularly published on the intranet

Mindset & Culture – Speak-up culture campaign

- **My personal experience**

- people across the globe have a very similar view and understanding of «ethics and integrity»
- people living in higher compliance risk geographies are very engaged in compliance dialogues (in particular young talents)

- **My personal opinion**

- global companies have to apply the same standards on ethics and integrity in all locations
- compliance message and program needs to be the same in all geographies
- local culture plays an important role in the way engagement sessions are conducted

MYLAN'S SPEAK-UP PROGRAM

Christophe Lesguer

VP, Chief Compliance Officer - Europe

Mylan

DOING WHAT IS RIGHT

Mylan's Culture of Compliance

- For more than 50 years, Mylan has built a culture and reputation of high standards and doing business with integrity.
- Maintaining our reputation is up to each one of us.
- Your dedication to doing what's right, not what's easy is what makes Compliance part of Mylan's culture.



DOING WHAT IS RIGHT

Mylan's culture of compliance

- Global campaign
- Senior leadership sharing their views
- Employees involved from all locations
- Long initiative lasting over one year
- External speakers shared perspective and experience
- Tracked throughout the company

... Not what is easy



MYLAN'S CULTURE OF INTEGRITY

- **Treat others with dignity and respect**
- **Learn, understand, teach, and enforce compliance**
- **Avoid conflicts of interest between work and personal life**
- **Encourage truthful and ethical behaviour in others**
- **Gain others' trust through openness and honesty**

MYLAN'S CULTURE OF INTEGRITY

Ask Yourself:

- Is this action or decision consistent with Mylan's values?
- Can this action withstand public scrutiny?
- Does this action uphold Mylan's reputation as a company with high standards?

SPEAKING UP!

If you see or learn about someone doing something you think or know isn't right, contact your:

- Direct supervisor
- Human relations representative
- Local Mylan attorney
- Management representative
- Local or regional compliance officer

Have a non-written policy – and make it public!



ANTI-RETALIATION POLICY

Retaliation against any company personnel who reports a compliance-related matter in good faith is prohibited.

A report made in good faith means that it is truthful to the best of the reporting party's knowledge.



THANK YOU

We want your feedback! Use the conference app or visit the Registration desk.

Be sure to join the Twitter conversation: @CWEurope