

Best Buy's Path to a Code Refresh.

Updating policies and codes is a common activity in compliance and ethics offices. It can be a huge undertaking, but it should not be a miserable one. Ethisphere had the opportunity to talk to Best Buy about the recent experience of updating their Code of Ethics.

One of the first tasks given to Bill Underwood when he came into the role of Director of Global Compliance and Ethics at Best Buy was to rewrite their Code of Ethics. Like a lot of compliance professionals faced with a code rewrite, Underwood spent a good deal of time benchmarking other best-in-class codes. In particular, he was drawn to codes that had “conversations with employees, customers, shareholders and vendors that were real and not full of legalese.” Those examples inspired him to build a new code that would focus on real life, day-to-day examples of what it means for Best Buy to be at its best.

The timing of the code rewrite coincided perfectly with Best Buy's launch of their new brand strategy. The strategy is anchored on the Rallying Cry of “Let's talk about what's possible” and three Guiding Behaviors: Be human, Make it real and Think about tomorrow. “As soon as I looked at the new strategy, the foundation of the new code immediately took shape in my head,” recalls Underwood, adding, “I knew what it would look like, how it would feel and the way it should read.” The new Guiding Behaviors would be the foundation for the code. But getting from vision to code rollout would be an 18-month journey. For Best Buy, the path to a successful code refresh was paved with forethought, trust, and a commitment to that new brand strategy.

Forethought

The team knew they would use an outside provider to create the code. But before they started the RFQ process, they brought in members of the IT team to determine the best way to deliver the code to internal and external audiences. Would the code be web-based or PDF? This involves examining the cost and issues of protecting confidential information and online security. Knowing how the end product will work – allowing employees access to policies and resources, including videos, and incorporating easy links to forms and the hotline, etc. – are all factors to consider. Underwood cautions, “I think people can underestimate the importance of the conversation and the time involved in coming to an appropriate conclusion” on delivery format. They decided to use a PDF format and create internal and external versions.

Best Buy's compliance and ethics team also engaged the company's creative team early in the process. Since the creatives developed the new brand strategy, it was imperative to get them involved early to ensure the tone and visuals supported that brand strategy. Not only does it do that, but Best Buy leadership – from the CEO to board members – have declared it “a beautiful document, and that's not something you often hear about a code,” remarked Underwood, adding that “has a lot to do with engaging creatives early on.

Another aspect of planning is to clearly outline early on the role and expectations for subject matter experts (SMEs). Underwood met individually with SMEs to discuss the goal of consolidating the information in the new code from 40-some topics with a good deal of overlap and redundancy to a more streamlined and efficient way to address topics. He worked to get alignment from SMEs at several points along the way. “You need alignment about what we were going to talk about and, more

importantly, how we are going to talk about it,” says Underwood. Still prior to the RFQ process, the team worked on developing a draft table of contents. Underwood highlighted the importance of doing this early because “the vendor will provide recommendations, but it is important for you to have a strong point of view” before kicking off the process with your selected vendor.

When going through the vendor selection process, examine the samples offered by vendors beyond a thumbs-up or thumbs-down inquiry. “You’re going to see great [vendor] examples and beautiful codes, and you’ll also see codes that do not resonate at all with where you want to go,” says Underwood, emphasizing the importance of keeping in mind that the end work product of vendors is heavily dependent on two things: (1) the end-customer’s influence and desires, and (2) the individual vendor team members assigned to the project. Underwood advises asking vendors, “Who worked on this code who was your lead writer and who was your lead designer?” Don’t be shy to ask the vendor to assign particular writers to the project when you find a good match for your goals and get those individuals connected to your internal creative team from day one.

Trust

The team for this project consisted of more than 35 people. That required influencing without authority — up, down and sideways. People will have opinions on things outside of their scope of expertise and you have to be prepared to ask people to stay within their lanes. It’s also important to be clear about who has final say over the various aspects of code development. When the first draft arrived, Underwood bifurcated the review. Creatives were responsible for tone, style, images and design; SMEs were focused on the accuracy and clarity of the content. And Underwood worked closely with the lead writer to maintain a consistent tone throughout the document. Underwood would remind the SMEs, “Don’t focus on the photographs or text layout.” This also meant sometimes having tough and honest conversations with his leaders. Underwood explains, “A leader might say ‘I don’t like the way this looks. I would do this differently.’ But if that conflicts with what the creatives told me, 99 times out of 100 I’m going to defer to the creatives on that. Trust played a big role in the successful outcome of this project. “I was fortunate to have great leadership who had strong trust in me, the core team and our creatives to do what we do best,” Underwood says.

Trust, also, in knowing that things will not go according to plan but the solutions are available. “No matter how much you plan, no matter how much time you put into perfecting every single detail, something will not go according to plan and you have to roll with it,” says Underwood. In this case, the team was within a few months of completing the project when Best Buy’s CEO announced he was moving to a new role as executive chairman and his successor was selected.

Brand Strategy

To align the updated code with the new Guiding Behaviors, language and tone were paramount. In order for the code to read as a cohesive document with a single voice, they relied on a single writer (with the support of the project team). As long as the content was accurate, that writer had significant control over the narrative. The outcome was a document that employees are actually reading because it resonates with and rings true to the culture at Best Buy. “If I could describe the language in one word, it would be ‘real,’” Underwood said. And employee response has been very positive. When people talk about the code, Underwood says, “they use adjectives like warm, welcoming, inviting, real and human.” Compliance documents are not known as popular reading material, and you can hear the smile in

Underwood's voice when he says, "the greatest compliment that somebody can give me on this code is to tell me they read it."

When it comes to translating the code in Chinese, Spanish and French, it's not only the words that need translating, but also the meaning, feeling and tone. Underwood feels one of the exciting things about this project was the opportunity to see how each of the countries took the new Rallying Cry and Guiding Behaviors and made them their own in their respective language. The challenge was to maintain that meaning and tone in both the code and the Open & Honest Ethics Line landing page because chances are you're not getting the same person doing the same translation. "Our internal partners did a very nice job of ensuring cohesiveness of the message across both platforms," notes Underwood.

Not only is the code language reflective of the Values and Guiding Behaviors, but the design of the code is people-focused, taking the Guiding Behavior of "Be human" as central to the entire effort. Part of the new brand strategy at Best Buy involved the creation of a beautiful portfolio of portrait photography that focuses on employees across the entire enterprise. The code prominently features these portraits. "Of course, our products and services are critical. But the code reflects Best Buy's greatest asset: our people," says Underwood. "It's very intentional. You will not see a picture of a product within our code. It is all about our people."

Because the Guiding Behaviors had been fully championed across the entire enterprise and people were really embracing them, the project team was able to harness that momentum to carry them through the journey of rewriting a code of ethics that would be real and human. Underwood sums up the experience saying, "It was a pleasure to do this work. Shepherding a document through dozens of internal partners could be a potential nightmare, but it was actually a fantastic experience".