Jon White

- 35 years in Asia

- 22 years with Connor (Sourcing)
  - Chief Ethics & Compliance Officer

- Established Omega Compliance in 2005
  - Managing Director

- jwhite@omegacompliance.com

Omega Compliance

www.omegacompliance.com

- Global Service Provider to multi-national retailers and consumer good brands

- Operations covering over 30 countries

- Investigations & Integrity Program Development

- Corporate Social Responsibility & Responsible Sourcing Program Development & Consulting

- On-site Factory auditing

- Intellectual Property Due Diligence

- Country of Origin Verification

Omega Compliance Limited

"

It takes 20 years to build a reputation and five minutes to ruin it."
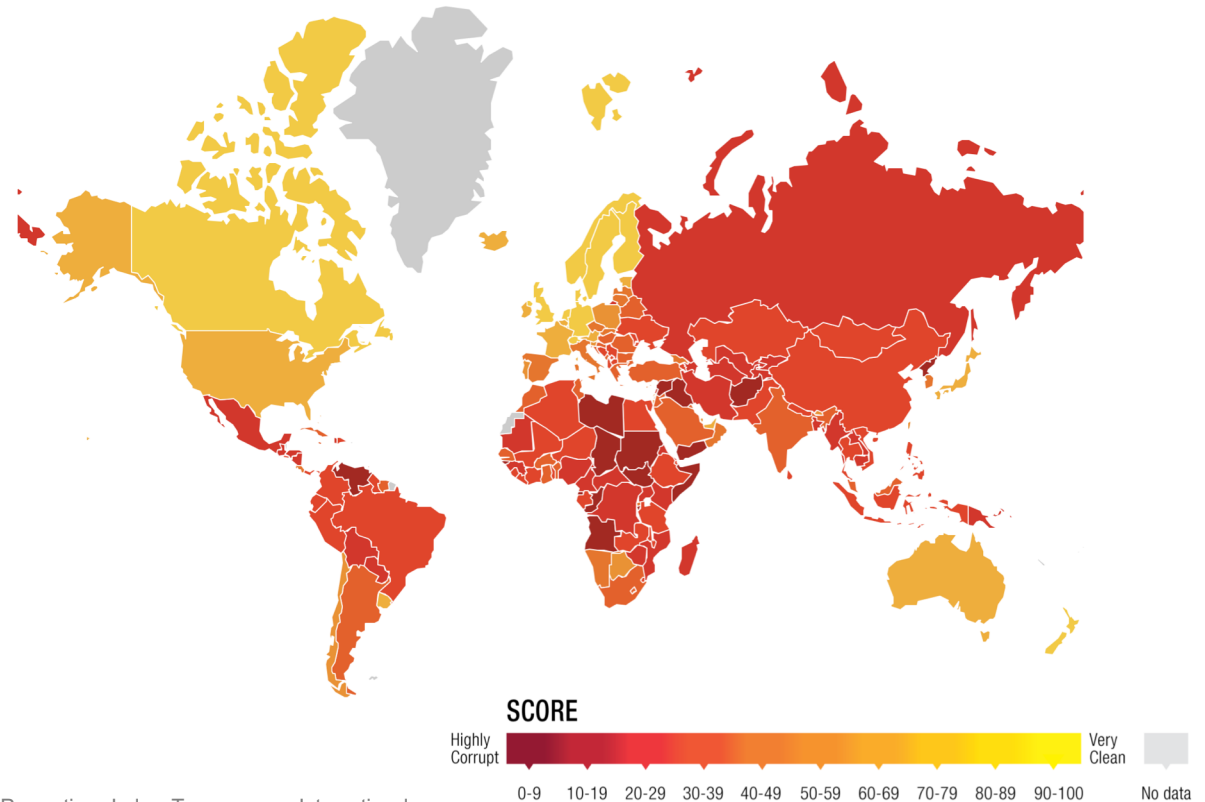
"

- Warren Buffet

TRUST, TRANSPARENCY, TECHNOLOGY, AND CHANGE

We are in the midst of a profound re-ordering of relationships in the global commercial sphere that is leaving no industry and no business untouched.

Like all business transformations, this one is being fueled by **rapid technological change** and **generational attitudes and <mark>behaviors</mark>**.

Global Organizations Face Risks Everywhere

What determines success are the processes and procedures in place to deal with these risks, whether known or unknown

SCORE

Highly Corrupt | 0-9 | 10-19 | 20-29 | 30-39 | 40-49 | 50-59 | 60-69 | 70-79 | 80-89 | 90-100 | Very Clean | No data

2020

- **Reduced management oversight**

- **3rd Party Risks**

- **Reduced training**

- **Program enhancements on hold**

- **Integrity not a priority**

Does the company have the character and culture to ensure potential ethical failings are stopped *before* they escalate?
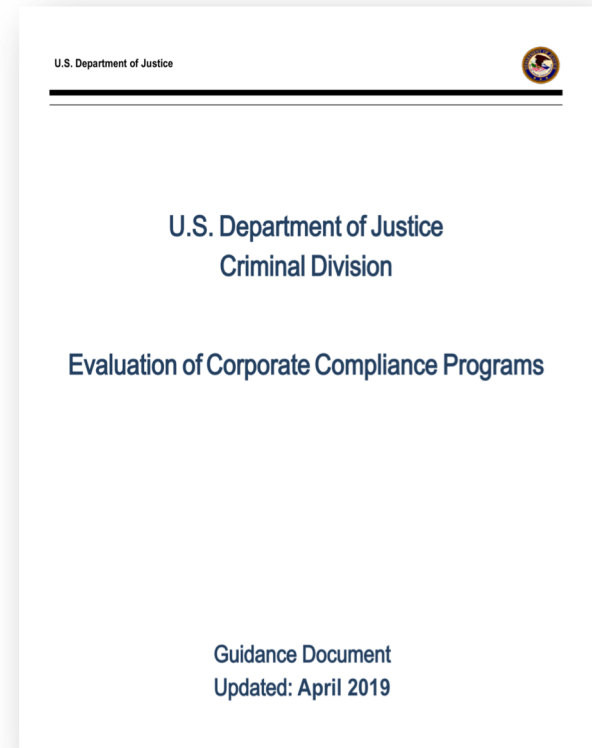
Regulatory Update : New DOJ Guidance

April 2019 regulatory guidance affirms the importance of a program that is truly effective, responsive to change, and tailored to the employee base.

Policies Are Key to a Strong Program. Policy development needs to span multiple functions, cover entire "spectrum of risks", and go hand-in-hand with training

Training Can't Be One-Size-Fits-All. Tailor training "appropriately" by addressing contextually-relevant employee risks, delivering it in a way that is accessible given operational or cultural constraints, and consider employees' existing knowledge of various risks to ensure the training is delivered at an appropriate level.

Managers Matter. Prepare one of your most important compliance resources – managers – to handle their responsibilities as stewards of the tone at the middle.

Stories Resonate with Employees. Examples of "misconduct that led to discipline" in communications and training, to illustrate how compliance issues can play out in real life

U.S. Department of Justice

U.S. Department of Justice
Criminal Division

Evaluation of Corporate Compliance Programs

Guidance Document
Updated: April 2019

Ethical Leadership

American Apparel & Footwear Association

Responsible Business Alliance (RBA)

Ethical Culture vs Culture of Corruption

Ethical Culture	Culture of Corruption

- **Company of choice**

- **Recruitment of high level candidates**

- **Retention of good staff**

- **Environment of trust**

- **Innovation, creativity**

- **Open communication**

- **Employee engagement**

- **Teamwork**

- **Less time spent on unethical conduct = more time on development and excellence**

- **Fear and uncertainty**

- **No one asks questions or raises concerns or new ideas**

- **Abusive language, poor attitude or other forms of disrespect**

- **Favoritism / cliques**

- **Poor morale and lack of teamwork**

- **Sense of entitlement**

- **High fatigue which can lead to frequent or increased absenteeism as well as higher level of attrition**

- **High number of retaliatory reports**

Takeaways

- **Reputation is everything**

- **Take a proactive, holistic approach to manage corruption risks**

- **Map your risk**

- **3rd Party Declarations**

- **Reinforce policies**

- **Utilize technology**

- **Protect your data**

Takeaways

- **Ensure your employees / teams know what to do when confronted with ethical dilemmas - surveys**

- **Communicate the importance of transparency, including reporting of attempted bribery - hotline**

Takeaways

communicate,

communicate

and

communicate

"Next To Doing The Right Thing, The Most Important Thing Is To Let People Know You Are Doing The Right Thing." – John D. Rockefeller

The reputation of a thousand years may be determined by the conduct of one hour.

JAPANESE PROVERB

Q & A