



## **WANT TO BUILD A CULTURE OF COMPLIANCE? INVITE YOUR EMPLOYEES INTO THE PROCESS**

### How Western Digital Innovates Integrity by Giving Workers a Voice

Written by Brendan J. Hanley, Sr. Director and Assistant General Counsel, APAC Ethics & Compliance **Western Digital (Thailand) Co. Ltd.**

Imagine waiting to walk into a huge conference room filled with 500 fellow employees and it is so silent you can hear a pin drop in the far corner. Knowing this is supposed to be a fun celebration, you start to wonder if something is wrong. You step foot into the room and 1000 eyes are on you with blank stares. Then, in unison, every single person starts to a wave mini-flags with an image of your department mascot—still in silence—but with beaming smiles. On stage, you feel gratified with the energy of the room.



Everyone is greeted by a local leader who speaks of how important your team is to that site and the company as a whole. The leader then joins other employees on stage to perform an amazingly orchestrated dance performance, which they have been practicing for weeks. You get up to speak and people are engaged, clapping at times, laughing at times. You ask the audience to participate in a quiz, and people are eager to jump out of their seats to answer the questions. The event finishes with loud applause, co-workers with smiles and talking to each other. Employees tell you how much they enjoyed the event, and then confide in you with a problem they are having at work. Does this sound like a typical legal compliance themed company event? I think not, and I say so with almost 20 years of legal work experience. I have never seen this level of engagement, not in any of the numerous roles and companies I have worked in. In this article, I would like to share at least 3 initiatives our Ethics and Compliance program at Western Digital has taken that have resulted in this unique and impressive level of engagement.

#### **1. Compliance Champion Program**

One aspect of Western Digital's compliance program that I am particularly proud of is our Compliance Champion program. We work with site leaders to select rank and file employees to essentially be ambassadors of our Compliance program at that particular site. These employees are our eyes and ears, because we only have so many of those on our own team. Specifically, we ask our Champions to help foster a culture of compliance, be a guide to employees, and create awareness on compliance policies, processes, and guidelines. In a company-wide cultural survey in 2019, 39% of employees chose "Ask a Compliance Champion" when asked what they would do if they had an Ethics and Compliance related question. That is a significant number of employees and shows the impact this aspect of our program really has.

*Tip: Choose the right employee. At Western Digital we look for an employee that has strong ethics and values. Also, an employee who is approachable, compassionate and mature enough to guide employees. If you use multiple Champions, try to choose people from various departments.*

#### **2. Compliance Review Boards:**

We set up regular (2-3 times per year) meetings with each site leadership team to discuss compliance related topics. This meeting allows us to communicate important messages related to



Tiffany Scurry (left), Vice President and Chief Compliance Officer at Western Digital, presents A World's Most Ethical Company award at a CAM site event (described in the introduction)".

compliance, but more importantly to garner feedback from that team about what we can do better, or what site-specific issues we should consider in our plan to support that site. This enhances engagement because the leaders understand what we are doing and have a chance to let us know exactly how we can best support that site. This usually comes in the form of a business update, such as a recent increase of hiring or an increase in production, which allows us to be better informed about how to proceed with the communication, training or policy. Keeping site leadership engaged enhances the tone at the top, which is critical for any successful compliance program.

*Tip: Come to these meetings with data. Since Western Digital is a data storage company, our leadership expects to see numbers that tell a compelling story. This can be challenging for a compliance program, but certainly doable in regard to investigations, training, and surveys.*

**3. Compliance Awareness Month (CAM)**

CAM is an initiative where we ask the company to dedicate their attention to compliance related matters for a month. Our initial objective was to enhance awareness of the importance

of completing our annual compliance training, but it ended up being so much more. As described in the introduction, our employees have completely embraced this concept via local site events and have intertwined these events with local culture. CAM energizes our employees because we allow each site to personalize their experience.

We have a major event at each site. Usually a half or full day of activities, with the all employee meeting being the major attraction. In order to pull this off, we enlist the help of our Champions, who form a committee to help message, organize and run everything leading up to and during that month. This committee is essentially allowed to run CAM how they see fit. That results in an amazing amount of creativity, but also ownership, both resulting in engagement. Some examples of variation in creativity include a poem contest in Japan, compliance dioramas in the Philippines, and compliance art-themed contests at many other locations. Other factors that help with engagement at CAM include a strong leadership messaging/presence, and an emphasis on employee recognition throughout the month.

*Tip: Leadership buy-in is a must. Some of our site events are at factories, and these events can be considered disruptive. But*

*we spend considerable time, from our executive team down, explaining why this is important. Without this, you could be setting yourself up for failure!*

At Western Digital, the Ethics and Compliance team strives to make it easier for our employees to act ethically. When employees are engaged, it is definitely easier to act ethically, and we feel that CAM, compliance review boards, and our compliance champion program all contribute to a healthy level of engagement and a robust ethical culture at Western Digital.

**Expert Biography**

 **Brendan Hanley** leads Western Digital's Ethics and Compliance program in the Asia/Pacific region, covering tens of thousands of employees across diverse countries. His team manages projects/issues focused on leadership engagement, develops awareness campaigns, investigates misconduct and trains on policies and regulations including anticorruption/anti-bribery, antitrust, confidential information/IP and data privacy.