



# **BELA South Asia Virtual Roundtable** **Hosted by Dr. Reddy's Laboratories**

*March 24, 2021*



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# PARTICIPATING ORGANIZATIONS

- 3M Company
- Accenture
- Bayer
- Boeing
- Biocon Biologics
- Capgemini
- Diageo
- Dr. Reddy's
- Dell
- EY
- Genpact
- GE
- Honeywell
- Johnson Controls
- KKR
- Infosys
- Intel
- Mahindra
- Nokia
- Omega Compliance
- SAP AG
- Stryker
- TATA Steel
- The Coca-Cola Company
- Western Digital Corp



Wednesday, March 24, 2021

# Agenda

THANK YOU TO OUR PRESENTERS



09:30AM - 09:35AM

Welcome by Ethisphere

09:35AM -09:45AM

Opening Remarks by Irfan Ahmed, Dr. Reddy's Chief Compliance Officer

09:45AM-10:50AM

**Topic 1: Re-imagining an ethical culture in the wake of a pandemic**

Led by Irfan Ahmed, Chief Compliance Officer, Dr. Reddy's; and team, this session will provide a holistic view of Dr. Reddy's compliance program, and its evolution. In this conversation, Dr. Reddy's team will focus on Compliance Governance, Digitization of Compliance processes, Speak Up (role of Ombudsperson), among other topics.

Q&A

10:50AM-11:00AM

Short break

11:00AM- 11:55PM

**Topic 2: Using Data Science to proactively prevent and detect misconduct**

Data analysis has proven useful not just in detecting issues, but also proactively preventing the misconduct from taking place, such as: Just in time training, speak up metrics analysis, third party risks, etc. This conversation will focus on how leaders are using data science/ analytics to make informed decisions; and allocate resources. It will also explore how to apply data analytics to drive program effectiveness.

Topic Leads: Sonali Narasimhan, Regional Head of Compliance, Asia Pacific, **Johnson Controls**, Arpit Gupta, Director, Compliance, **Stryker** Amit Rahane, Partner, Forensic & Integrity Services, **EY**

Q&A

11:55AM- 12:00PM

Wrap up by Ethisphere

Wednesday, March 24, 2021

# **TOPIC 1 | RE-IMAGINING AN ETHICAL CULTURE**

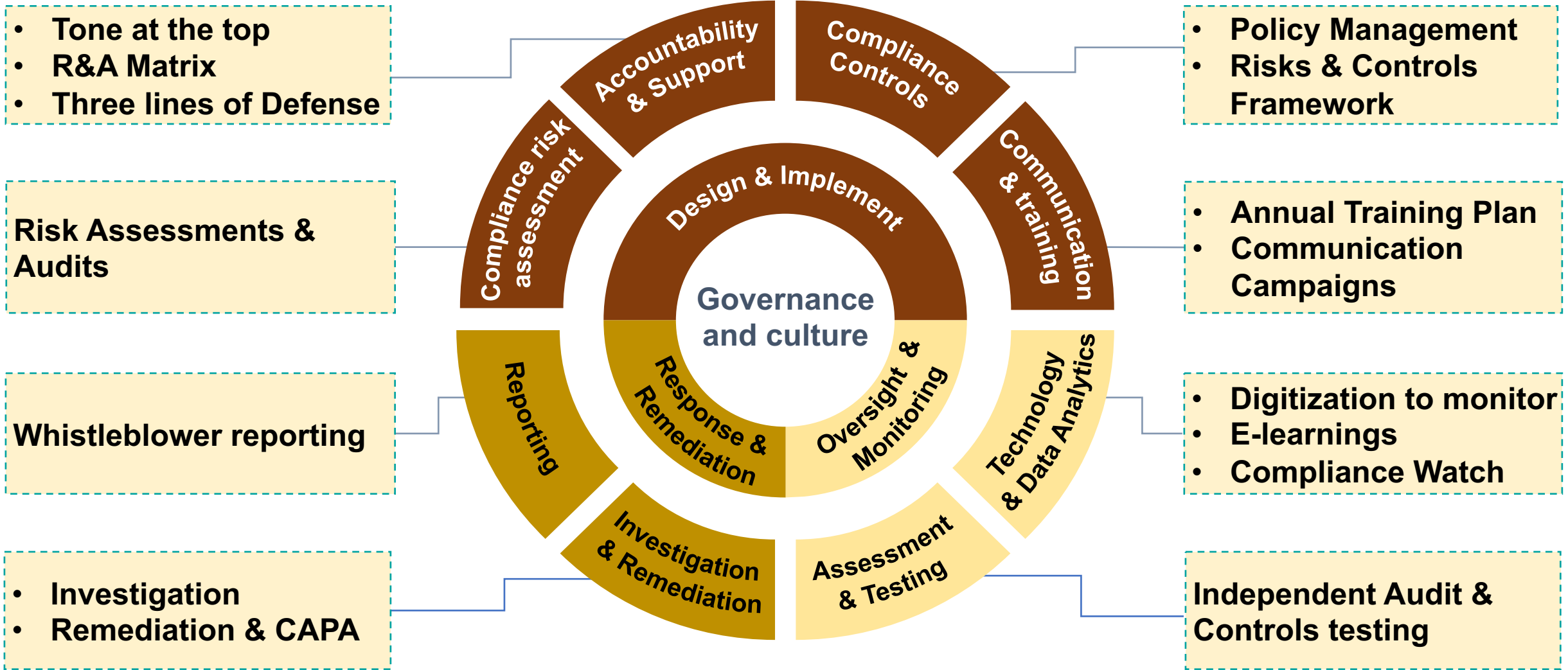


Irfan Ahmed  
Chief Compliance Officer



**Co-panelists from Dr. Reddy's Compliance Team:**  
Arun Kasat, Lead - Compliance, India Business  
Asif Usmani, Lead Compliance-APAC, MENA and CoE  
Arjun Bansal Senior Business Compliance Manager

# PROGRAM OVERVIEW



# DISCUSSION NOTES

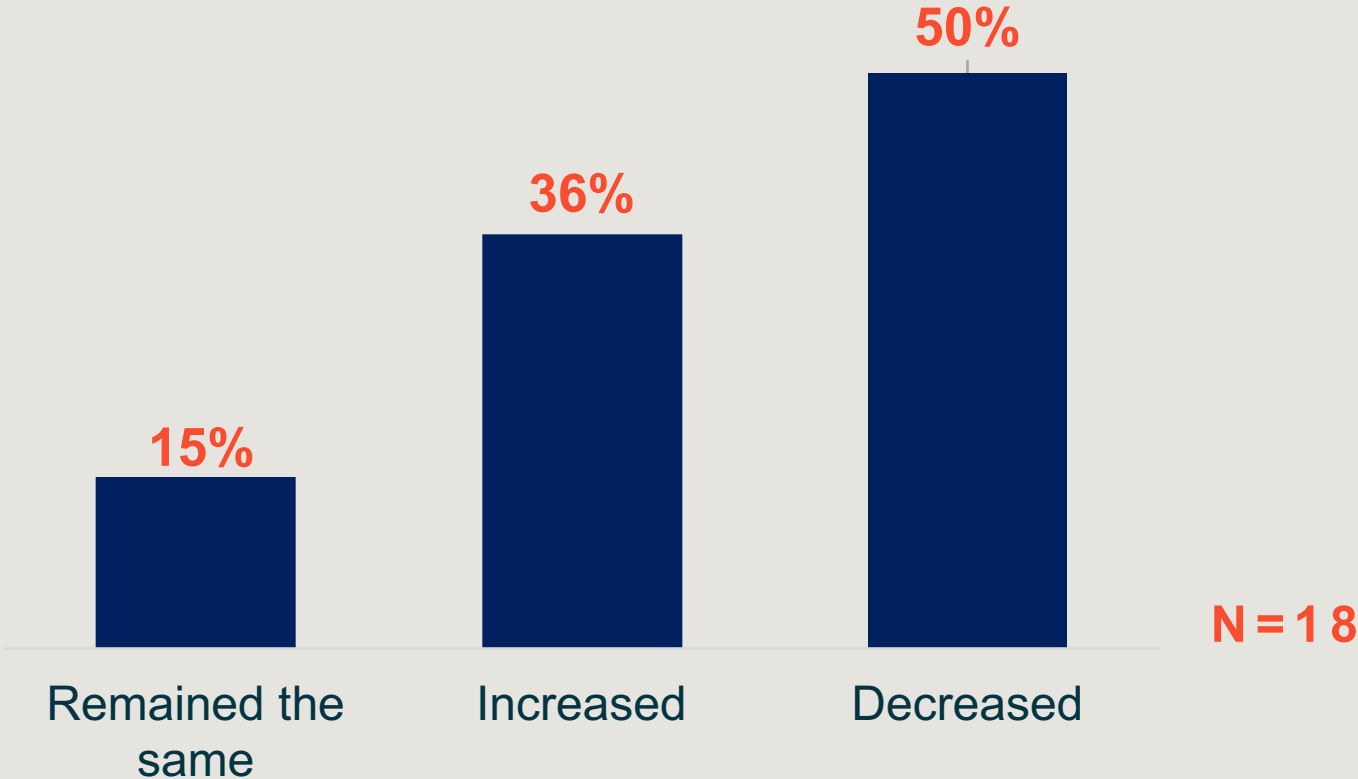
More on this topic on the [BELA South Asia Member Hub](#)

## Evolution of Dr. Reddy's Compliance Program: Leading by example

- Fixing the foundations: It is important to look at each and every aspect of the compliance framework. A Compliance governance framework was developed and followed step-by-step
  - The goal of the compliance function is to always pause and take a look at the program and focus on continuous improvement
  - Tone at the top: This is always relevant when re-imagining an ethical culture; support from leadership (the board) remains critical
  - Digital: Innovation and technology are core to compliance and the processes
  - Working with sister functions is part of the evolution
- Compliance governance allowed the compliance function to provide more ownership to the business; and the leaders involved are compliance ambassadors/ champions. Here is an overview:
  - Compliance Council: A defined charter, the Chair is a country head or a business leader of a particular region
  - With 29-30 geographies, and being the only Indian pharma company listed on the NYSE, it was necessary to develop regional compliance councils
  - Every quarter business leaders/ councils meet to discuss all compliance-related matters, risk management, etc
  - All the regional councils fold into the corporate compliance council which includes the CEO and other key partners within the organization.

# BELA SOUTH ASIA ROUNDTABLE POLLING RESULTS

Has the number of compliance cases increased or decreased due to the pandemic?





# DISCUSSION NOTES

More on this topic on the [BELA South Asia Member Hub](#)

## Evolution of Dr. Reddy's Compliance Program: Leading by example

- Digital Transformation: About 90-95% of compliance processes are automated. The culture of compliance was not drastically impacted because of early automation
- Remote workers: As the compliance program evolved, this is an area we have planned over the last 3-4 years, so the move to a virtual setting was not cumbersome
- Managing Investigations: A Digitized process and promoting a speak up culture
  - Multiple reporting channels and hotlines
  - Implemented a global platform
  - Manager trainings
  - Compliance bulletin to drive awareness: These highlight case studies on topics such as data integrity, sexual harassment etc. These bulletins are shared with the Board, Chief Ombuds leader and more to drive a culture of transparency
- The impact of the pandemic:
  - Like most companies, the pandemic came as a surprise. Having a digital policy in place was helpful as the lockdown occurred
  - Given that there was an established framework in place, it was easy to set out the policies and keep employees informed on data privacy. Traditionally this would have taken more time but given the situation it progressed very fast
  - Despite the move to virtual, another area of focus was promoting a speak up culture; and this was done through training; and support from leadership

A dark, semi-transparent background image showing a person from behind, looking towards a group of people in what appears to be a meeting or office setting.

ETHISPHERE DATA:  
**SPEAKING UP**  
**MATTERS**

In a survey of **433,186 employees**  
around the world

**16.3%**

Confess that they have observed unethical behavior or business misconduct at their company over the past 12 months – and only 51.5% reported it. That's 34,245 unreported instances of misconduct.

# RECOMMENDED BELA RESOURCES

**Expert Insights: Total Integrity Management: Why Ethical Decision Making Should be the Core Focus of Executive Leaders**

<https://bela.ethisphere.com/resource/ethical-decision-making-kelleyschool/>

**Policy on Messaging Apps and Ephemeral Communications:**

Shared by a BELA member, this is an anonymized version of a policy on the use of text messaging and other ephemeral communications technology for business communications:

<https://bela.ethisphere.com/resource/policy-ephemeral-comms/>

**2020 BELA South Asia Magazine:** Appropriately themed, “India’s Unified Force During an Era of Disruption” explores how leaders across the country tackle issues such as employee health and safety, data protection, policy management and the transition to a remote work setting, while dealing with one of the world’s largest lockdowns:

<https://bela.ethisphere.com/2020-bela-south-asia-magazine/>

**Data Analytics Masterclass Series:** In this masterclass series, join **Ethisphere** and our partner **Lextegrity** to learn about data analytics, how to identify relevant data, ways to generate compliance value from data and how to avoid common pitfalls:

<https://bela.ethisphere.com/resource/masterclass-data-analytics/>

**Building a Culture of Integrity:** TechnipFMC shared a presentation on their approach to building an integrity culture. The presentation includes an overview of their values, leadership commitments and activities, and novel training and communication practices.

<https://bela.ethisphere.com/resource/technip-integrity-culture/>

**On-Demand Data: Measuring Ethical Culture:** Data trends and highlights on measuring ethical culture from the 2020 WME data set. Including: Types of measurement approaches and surveys used; Frequency of measurement:

<https://bela.ethisphere.com/resource/measuring-culture-2020/>



Wednesday, March 24, 2021

## Topic 2 |

# Using Data Science to Proactively Prevent and Detect Misconduct

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THANK YOU TO OUR PRESENTERS



Amit Rahane,  
Partner, Forensic & Integrity Services,  
**EY**



Sonali Narasimhan,  
Regional Head of Compliance, Asia Pacific  
**Johnson Controls**



Arpit Gupta,  
Director, Compliance,  
**Stryker**

# BELA SOUTH ASIA ROUNDTABLE POLLING RESULTS

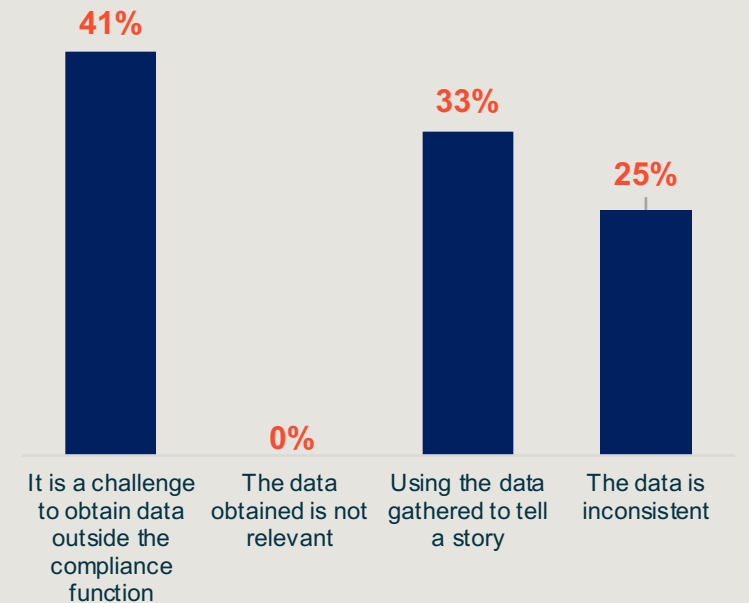
How do you currently use data to drive compliance effectiveness?

N = 11



What are your challenges when pulling data from various parts of the business?

N = 12



# DISCUSSION NOTES

More on this topic on the [BELA South Asia Member Hub](#)

## The Various Uses of Data

- There's a lot of dependency on where the key risks lie. It is important to:
  - Build capabilities around mapping data to make it meaningful and identify risks early on. The risk landscape has been amplified since the start of the pandemic. It remains a place of constant growth for compliance leaders
- Elevating the compliance program and driving value: Companies are turning to visualization techniques and machine learning to collect relevant data
- To receive buy-in from the business, compliance leaders should provide a value add (from the perspective that compliance is proactive monitoring)
- When it comes to data, it is easy to spend a significant amount of time weeding out unnecessary information and noise. It is important to zero in on the most relevant data like third party risk management, integrity, cross border customers, antitrust, high-risk transactions, etc. These areas can form a robust compliance risk assessment
  - Speak up metrics, online dashboards have been useful in finding the most relevant data
  - **Privacy by design:** The entire suite of products need to show that we are compliant with privacy laws such as GDPR and California Consumer Privacy Act
  - **Privacy impact assessments:** The privacy team is a small team, a database solution is often used to monitor (in real time) the products and checking if a privacy impact assessment has been conducted or not
  - Using the data on new products, conducting a real time exercise, focused on risks is one way to collect relevant data.



ETHISPHERE DATA:  
**COMMUNICATION  
MATTERS**

In a survey of **412,798 employees from global organizations** across dozens of industries

**36.7%**

said their manager **discusses ethics or compliance** related issues and topics more than **once per quarter**

# DISCUSSION NOTES

More on this topic on the [BELA South Asia Member Hub](#)

## Compliance Programs Rely on Data

- Just-in-time Training: This is a selection of training and it is about identifying the exact risk event, and the goal is to develop the right amount of training—at the right time to the right person. This requires compliance department to intelligently think about the profile of the transaction and the data required
- Targeted reminders and training
  - For example, someone booking travel to attend a trade show, compliance will send them a competition and antitrust reminder training, reminding them how to behave and act on behalf of the company
- Salesforce data
  - Monitoring data on salesforce to track if a high risk transaction is about to take place and sending an anticorruption reminder, revenue recognition policy— exactly at the right time so employees are aware of what should be done in terms of preventing bribery
- Backing up compliance programs with data:
  - At the industry level, significant risks exist among channel partners. A lot of this information comes in through Salesforce. It is important to understand to conduct a system base analysis, and techniques where we consider multiple variables to glean meaningful insights
  - Excel base trackers allow companies to map out information into a dashboard



# DISCUSSION NOTES

More on this topic on the [BELA South Asia Member Hub](#)

## Online Training: Using Data to Drive Changes in Behavior

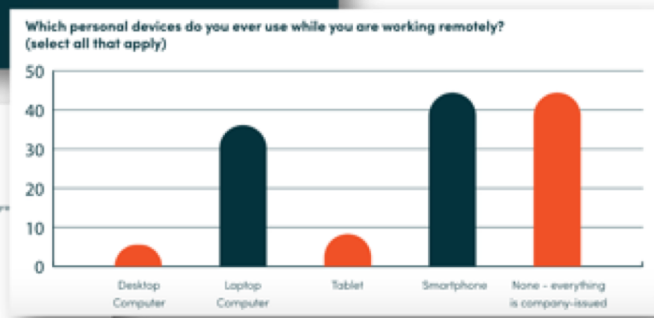
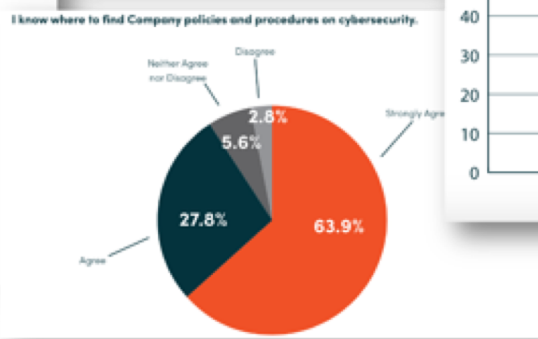
A common question for every compliance leader is how do you achieve 90+ on completion of online training?

- During the pandemic, some companies have successfully rolled out online trainings, and received between 98%-100% completion. Here are the drivers:
  - Dashboards: A visual dashboard provides insights into training completion rates by countries, by business lines, etc
  - Compliance leaders have access to this information and they regularly monitor the completion rates
  - Personalized follow ups are often used to target employees that have not responded to their online training requests
  - Connecting with data experts at the global level to understand how the data is collected; and the items they look for when creating online training tools
  - Support from leadership. Reminders and narratives from senior leaders impact the completion rates
  - Surveys are important to gain a deeper level of insights into the company's culture

# 2021 BELA SOUTH ASIA CYBERSECURITY REPORT



**1 IN 5**  
"One in five, or 20 percent of those surveyed, believe that employees may be unaware of how to identify and report a concern that can leave the company at risk of a data breach."



This comprehensive report was compiled under the direction of our BELA South Asia working committee, which consists of leaders from **TATA Steel, Honeywell, Intel and Cummins.**

We believe this report contains essential information that will help inform and arm you with data, resources, and thought leadership.

[DOWNLOAD HERE >>](#)

*"Digital is the way to the future. Indian businesses need to become far more productive and far more efficient and that productivity and efficiency will not happen unless you go the digital route.*

– Arundhati Bhattacharya, Chairperson and CEO of Salesforce India.



# RECOMMENDED BELA RESOURCES



## **LinkedIn: 2020 South Asia Ethics Summit Video Replay:**

In this session, Aryn Thawer, Head of Global Compliance & Integrity, **LinkedIn** shared his views on digital transformation and promoting integrity during a time of disruption:

<https://bela.ethisphere.com/resource/2020-saes-keynote-linkedin/>

## **Pfizer: 2020 South Asia Ethics Summit Video Replay:**

Sandeep Seth, Director, Corporate Compliance, Pfizer, Nikunj Savaliya, Company Secretary, Bayer CropScience Limited explain how analytics and digital transformation will establish greater compliance effectiveness:

<https://bela.ethisphere.com/resource/saes-2020-digital-transformation-day1/>

**EY 15th Global Integrity Report 2020** The COVID-19 global pandemic has shocked the world, impacting life for families, communities and organizations on every continent. Amid the turmoil, businesses and governments are faced with new and significant decisions that pose difficult ethical dilemmas

<https://bela.ethisphere.com/resource/ey-global-integrity/>

## **BELA South Asia Webcast Series | EY's Global Integrity Report 2020 – Spotlight on India:**

In India, in specific, the disruption caused by the pandemic has impacted businesses across the country. From cybersecurity to data privacy—compounded by a myriad of ethical challenges—India continues to battle the repercussions of the pandemic:

<https://bela.ethisphere.com/resource/global-integrity-report-2020-webcast/>

# Call for Committee Members: 2021 South Asia Ethics Summit

Together with the Confederation of Indian Industry, the **South Asia Ethics Summit**, now in its fourth year, provides the opportunity for participants to share thoughts and insights around the latest trends in ethics and compliance program development and strategy, as well as put a spotlight on the best practices being implemented by E&C leaders.

The Summit experience is driven by a distinguished working committee of leaders who come together to identify key topics impacting every corner of the business, and build an agenda featuring the best possible faculty of speakers. To become a member of this working committee, please reach out to us.

[Join the 2021 South Asia Ethics Summit Working Committee](#)

## 2020 Working Committee



Sheetal Raina  
Ethics Advisor, India,  
The Boeing Company



Satyajit Nandi,  
Third Party Compliance,  
Dun & Bradstreet



Piya Halder, Director,  
Integrity and Compliance,  
Honeywell India



Nishant Prakash,  
Senior Counsel,  
Infosys Ltd.



Sandeep Seth,  
Director Compliance,  
Pfizer

# 2021 GOALS AND UPCOMING PROJECTS: SOUTH ASIA

## South Asia Magazine

### Contributors: 40 (Digital Only)

- Dell
- Bharti Airtel
- Novartis
- Dr. Reddy's

## Updated Supplier Toolkit

### Working Group

- Sujata Nabar, General Manager, **Diageo India**
- Sheetal Raina, Ethics Advisor, India, **The Boeing Company**
- Seshadri Govindan, Ethics & Compliance, **3M**
- Satyajit Nandi Third Party Compliance, **Dun & Bradstreet**

## 2021 India Business Case for Compliance Deck

### Working Group

- Atul Kumar, Chief Ethics Officer, **SBI**
- Sandhya Sharma, VP, Corporate Governance, **Mahindra**
- Sandeep Seth, Director, Corporate Compliance, **Pfizer**
- Rajeev Chopra, Managing Director, Legal, **Accenture**

## Roundtables and Summit

### Virtual Hosts: April - August

- 3M
- Mahindra

# BELA SOUTH ASIA RECAP: "LEADING THROUGH CRISIS"

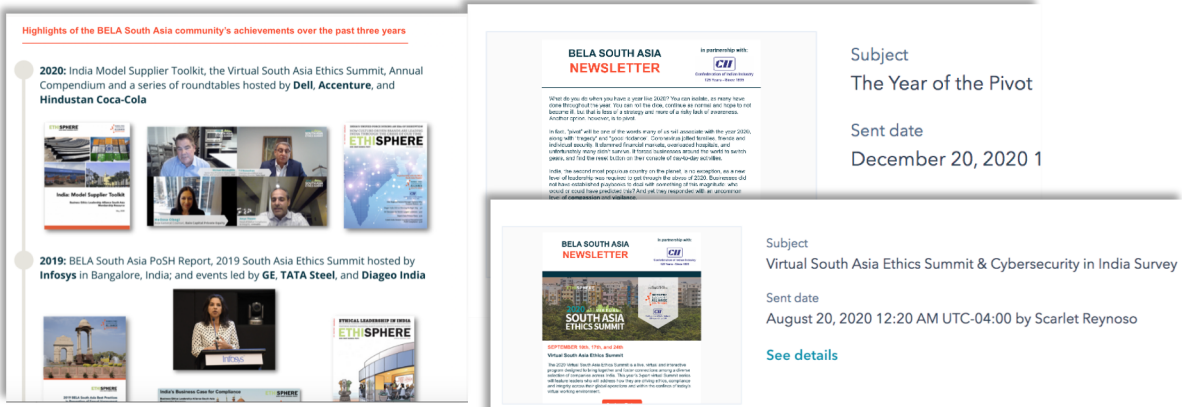


## Publications, Magazines and Research Projects

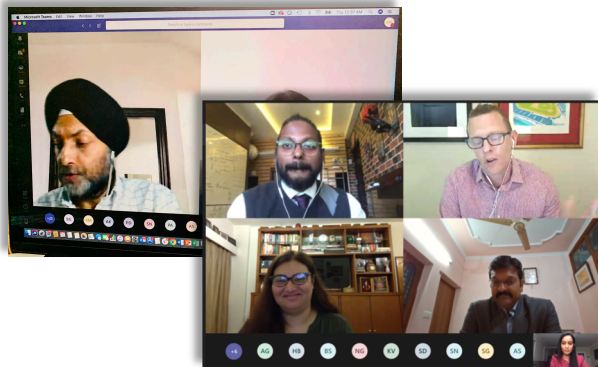


[ACCESS THE SOUTH ASIA MEMBER HUB>>](#)

## Newsletters Highlighting Our Work and Progress



## South Asia Ethics Summit, Quarterly Roundtables and Detailed Recaps





# Thank You!

## BELA SOUTH ASIA CONTACTS

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