



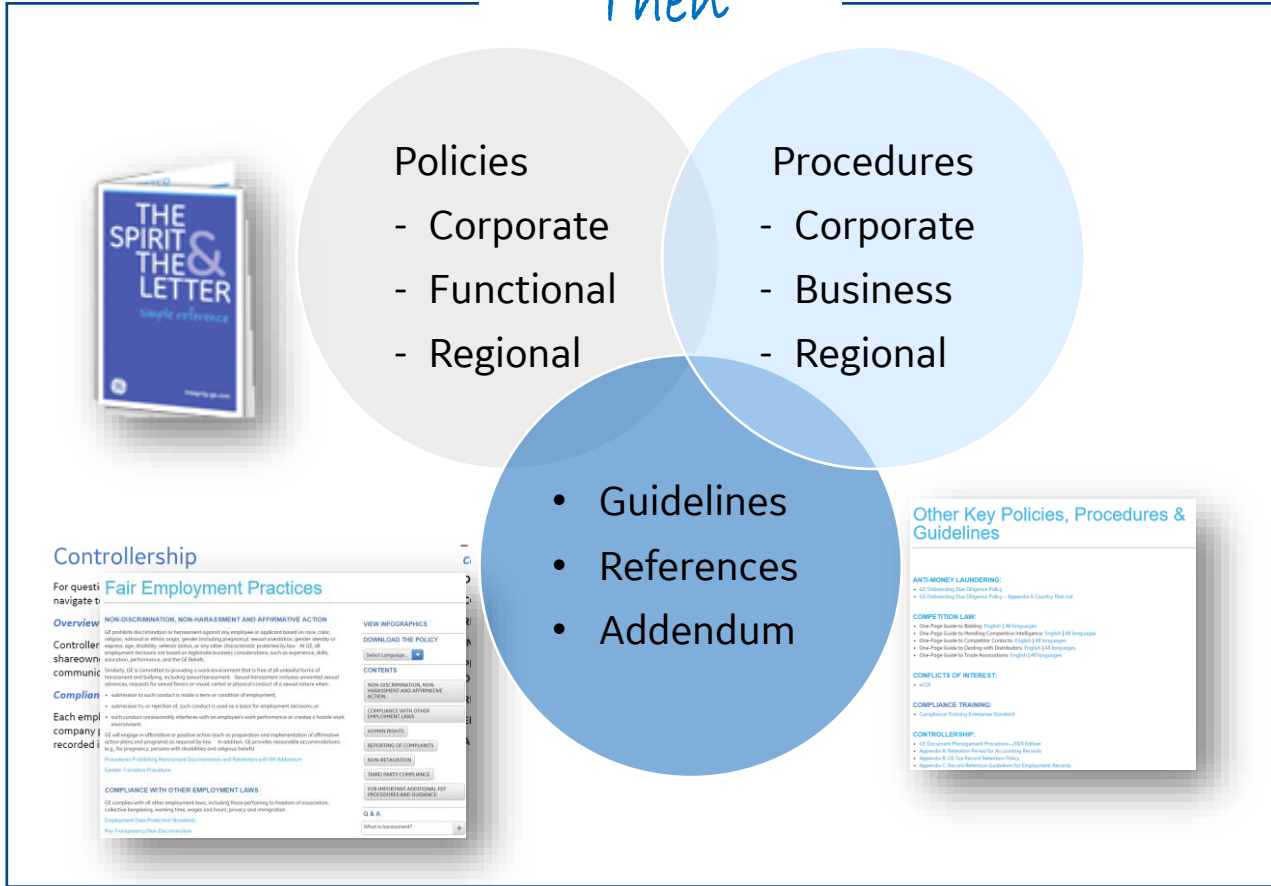
June 17, 2021

Creating an effective Compliance Policy Framework



Policy Ecosystem

Then



Now





Policy Project Overview

S&L Policies Revisions

- **Shorter documents** ... 1-3 pages, business-targeted language lifted & moved to Enterprise Standards
- **Simplified expectations** readability improved with simpler vocab and flow & feedback from non-legal employees (improved average grade levels from college senior to college freshman)
- **Reorganized format** ... different section headings focused on info, action & get help
- **Modernized look/feel** ... new header and footer to reflect E&C branding, plus a reference to Integrity Help Inbox



S&L Booklet Refresh

- **Embedding practicality**
 - ✓ Animated video per policy highlights a lesson learned or quick tips
 - ✓ Policy spotlight highlights important takeaway
 - ✓ Practical guidance by way of list of red flags, definitions of key terms, and/or a top FAQ
 - ✓ Direct link to the full policy & relevant portal
- **Aligning language** to updated policies, plus **new sections** to reflect newly created policies
- **Adapting to different users** ... interactive booklet available for browsing on any mobile/tablet/computer device & also for download as PDF (translations available)





Focus Group Process - Policies

Volunteers for focus group
nominated by regional &
business compliance leaders



4 focus groups of 20-30 employees
each asked to review a batch of 5
policies and submit feedback
through GE surveys

69 Participants

Across 42 different functional areas
that are *not* compliance or legal

Start Here

Thank you so much for taking the time to complete our survey. As we revise our Spirit & Letter compliance policies, we want to be sure that the expectations and requirements in our policies are easy for you to understand and follow.

[Click here](#) to access the Box folder with the draft policies or follow the links below. Note: You are only being asked to evaluate the content found within these policies - NOT any links/references to other documents and resources there may be. Additionally, the bullets have been numbered to make references easy - the actual policies will not be numbered.

* Your Name

* Your Business

* Your Function

ITEM # 1 - ANTI-MONEY LAUNDERING POLICY

[View policy here](#)

* This policy was helpful to my day-to-day responsibilities.

Strongly Agree

Agree

Disagree

Strongly Disagree

* I understand my obligations under this policy.

Strongly Agree

Agree

Disagree

Strongly Disagree

Is there anything that did NOT make sense to you (unclear or confusing to follow/understand)? Please include the paragraph number and letter (if applicable) and all relevant details.

0% of 6000 characters

* How likely are you to recommend this policy to a colleague? (1 being not at all, 10 being absolutely)

1 2 3 4 5 6 7 8 9 10

Survey included **closed- and open-ended questions** focused on whether policy was helpful, whether obligations were understood, & how to make language and expectations more clear

Survey results **analyzed and reported in a comprehensive summary** back to Policy Owner, along with proposed edits to the policy based on the employee feedback

Non-Legal Employee Feedback on Draft S&L Cyber Security Policy

ABOUT THE EMPLOYEES

- **16 total**
- Functions represented:
 - o Audit Leader (T&L); Business Engagement Manager; Communications; Controllership; Digital Technology; Engineering; Global Sourcing / Ombudsperson; Human Resources; Lead Production Supervision Specialist; People Operations; Properties
- Businesses represented: Corporate; Gas Power; Global Operations; Renewable Energy (LM Wind & Hydro)

SURVEY ANSWERS

1. This policy was helpful to my day-to-day responsibilities:
 - a. Strongly Agree – 11
 - b. Agree – 4
 - c. Disagree – 1
 - d. Strongly Disagree – 0
2. Why is that / what could make it more helpful (asked to anyone who did not select “Strongly Agree”)
 - Could we add examples of red flags for cyber security risks. For example I am not a cyber security expert and would like to see some more examples and specifics to help me navigate through
 - Think this is good-can add illustrations here
 - Continue



Example - Before/After of Security Policy

THE SPIRIT & THE LETTER
Securing GE Operations Globally

For questions on this policy, please find the appropriate policy center [links](#), or navigate to the Policy Owners & Coordinators section on [integrity.ge.com](#).

What to Know

The Company has no greater responsibility than protecting our people, our workplaces, our communities and the continuity of our business.

The Company has issued this policy to outline the basic security and crisis management measures that every GE business must have in place. The particular form of these security risk and crisis management measures will vary according to the nature of each business and the particular risks that it must address, but every business must implement a rigorous and comprehensive security risk and crisis management plan that systematically addresses security, crisis management, emergency response, and business continuity with respect to our people, facilities, information assets, technology, and supply chain. Vital parts of any such plan are processes for decision-making and for communicating with our employees and communities.

Care Requirements

The leader of each GE business is personally responsible for implementing a rigorous and comprehensive security risk and crisis management plan.

- Each plan shall include a process for identifying, assessing, prioritizing, and mitigating key risks to people (employees as well as other people working at or visiting GE facilities), to facilities, to information assets and systems, to GE technology, and to the supply chain.
- The plan shall also include a crisis management process to (a) minimize impact and provide for rapid and effective response to emergencies, including appropriate coordination with public safety and law enforcement officials and (b) plan and provide for disaster recovery and business continuation as soon as possible.
- The plan shall also include a process for communicating an appropriate about prevention, emergency response and business continuation with the GE community, government officials, the media and the public, among others.
- The leader of each business shall implement appropriate means to measure the execution and effectiveness of its comprehensive plan.
- The leaders of each business shall demonstrate compliance with the requirements of this policy within its functional review processes.
- Each business shall take all steps they deem appropriate in addition to the specific measures discussed below, including appropriate drill, education, and training.

Penalties for Violation

Employees who violate the spirit or the letter of GE's policies are subject to disciplinary action up to and including termination of employment. In addition, if laws are violated, employees or the Company may be subject to criminal penalties or civil sanctions (damage awards or fines). GE could also lose government contracting privileges.

Information security infrastructure from sabotage. This includes physical server and data storage space within GE's control as well as third party space that holds GE data.

- Each business shall establish redundant systems, as appropriate, to protect critical elements of its information security system.

Securing GE Operations Globally

BEFORE - OLD POLICY

Word Count: 1355
 Grade-Level: 16.8 (Professional Career)
 Avg. Words Per Sentence: 26.6
 Avg. Time to Read: 10.4 minutes

THE SPIRIT & THE LETTER
SECURITY POLICY

This policy addresses the physical security of our employees and work locations.

- For information on the security of GE data or information technology (IT), consult the [GE Cyber Security Policy](#).
- For information on safe working conditions and protocols at project sites, consult the [GE Environment, Health and Safety Policy](#).

What to Know

- GE wants all employees and contractors to feel physically safe and secure while on the job - whether at a GE work location or when traveling on behalf of the company.
- Our 24/7 global security operation teams are prepared to assist with security concerns that you may have. Security concerns may include thefts, assaults, missing employees, or risks presented by man-made or natural incidents.

How to Comply

At All Times

- If you see or sense that something isn't right, say something. You can report security concerns or suspicious events to a security leader, HR, legal/compliance, ombudsperson, or at [security.ge.com](#).
- Always be aware of your surroundings based on the environment you're in whether at a GE location, a customer site or a public place.
- Understand your role in GE's [Workplace Violence Prevention and Response Program](#) and how to report incidents.
- Understand that the company has special procedures to protect you in the event of a crisis or disruption to business operations. In these situations, follow the guidance of your business leaders to help keep you safe and keep our businesses running.
- Ensure that your contact and emergency contact information in your employee profile is updated regularly.
- If hosting or coordinating a GE event, help make it safe by completing the GE Event Tool at [security.ge.com](#).

At GE Work Location

- Know your GE work location's Site Security Leader.
- Adhere to all entry/exit procedures with particular emphasis on proper badging and escorting.
- Register and escort your visitors during their entire visit.
- Wear your badge visibly when working at a GE work location and ensure others do too. Badges provide a visible display that an individual's access is authorized.

E&C ETHICS & COMPLIANCE

For more help on this policy, visit the Ethics & Compliance website at [www.inside.integrity.ge.com](#) or contact Corporate Compliance at [integrity.ge@ge.com](#)

Approved By: Mike Cairn | Last Updated: Month Year

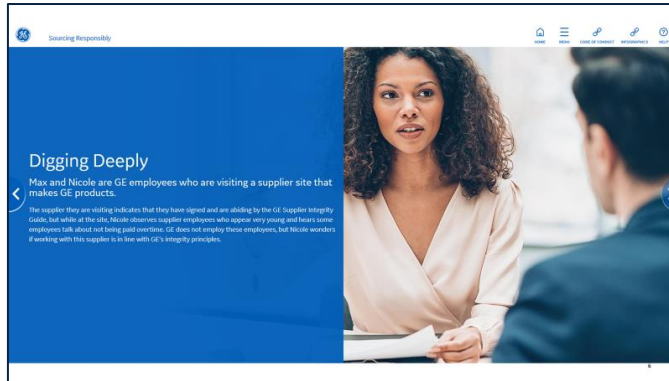
AFTER - NEW POLICY

Word Count: 438 ↓ 900 words
 Grade-Level: 11.9 (~High School Senior) ↓ 5 grades
 Avg. Words Per Sentence: 16.4 ↓ 10 less words per sentence
 Avg. Time to Read: 3.4 minutes ↓ 7 minutes faster

Employee Communication and Roll out

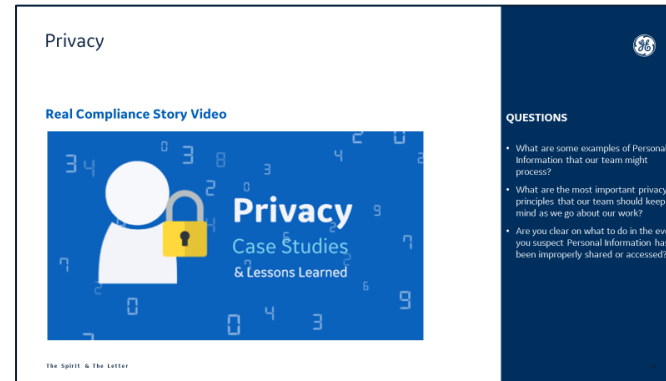


“Basic” Online Course



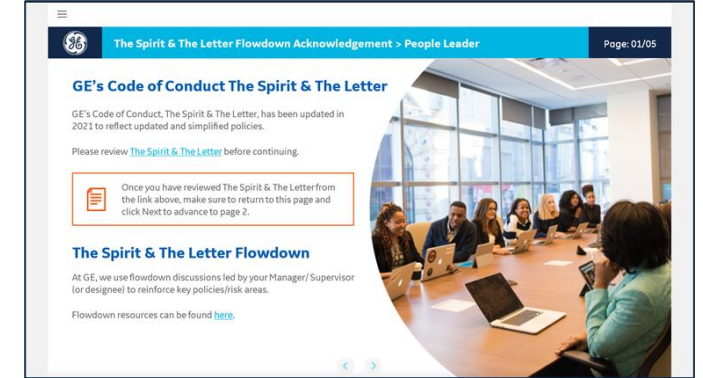
- Mandatory course for salaried new hires + many businesses have elected to use as a refresher
- Scenario-based format with videos & knowledge check questions throughout
- Includes a downloadable job aid for each policy area

Flowdown/Refresher Deck



- Managers lead team discussions
- Includes place for business leader video
- Includes “how to” guidance
 - Access the Code
 - Find business policy/risk area focals
 - Complete the S&L Acknowledgement
- Includes a section for each policy area:
 - Key points from the new S&L booklet
 - Link to animated video
 - Discussion questions

Acknowledgement



- Standalone & “Flowdown” Versions
- Includes Acknowledgement plus Open Reporting & Conflicts of Interest disclosure reminders
- Users must click on S&L booklet link to proceed in course
- New page added for people leaders about their integrity responsibilities

Enterprise Standards Governance



Phase 1

Capture existing level of governance

- Stakeholder expectations
- Current requirements
- Ownership assessment

Phase 2

Define expected level of governance

- Define 'core' requirements
- Monitoring expectations
- Systems & tools
- Assurance mechanism

Phase 3

Roll out Enterprise Standards

- Identify business risk owners
- Obtain business inputs
- Define effective date
- Establish oversight



Role of Corporate

- Global Standards
- Governance & Oversight
- Risk Assessment
- Escalations
- Key Risk & Performance Indicators
- Assurance & Audit



Role of Business

- Biz Policies & procedures
- Operationalize program
- Resource allocation
- Process & control set up
- Risk Assessment & remediation
- Monitoring

Example - Compliance Training & Communication Enterprise Standard



Enterprise standard

- Sets core training & communication expectations & target training metrics
- Businesses responsible for creating & documenting training & communication plans & training administration
- Annual update rhythm aligned to compliance risk assessment including a documented training & communication effectiveness analysis
- Corporate creates enterprise content where it makes sense
- Businesses must use S&L Basic course & Acknowledgement language approved by Corporate



How we work together

- Corporate & businesses identify content creation priorities each year and work together to create/update
- Periodic meeting with business compliance training focals, ... share best practices and work through operational issues
- Touchpoints between Corporate & business compliance training focals
- Compliance Dashboard provides transparent line of sight to training metrics

