

POLICY SIMPLIFICATION

Ensuring policies are clear, easily understood, and aligned to your values operationalizes your compliance program and meets regulators' expectations.

COMPLIANCE AT THE SPEED OF BUSINESS

For the past five years, regulators have been increasingly vocal about the need to make policies and procedures more accessible and easier to use. Many compliance policies nonetheless resemble a thicket of legal jargon and complexities rather than a users' guide to appropriate and compliant behavior. The United States Department of Justice's June 2020 expanded guidance picks up this theme and goes one step further by asking:

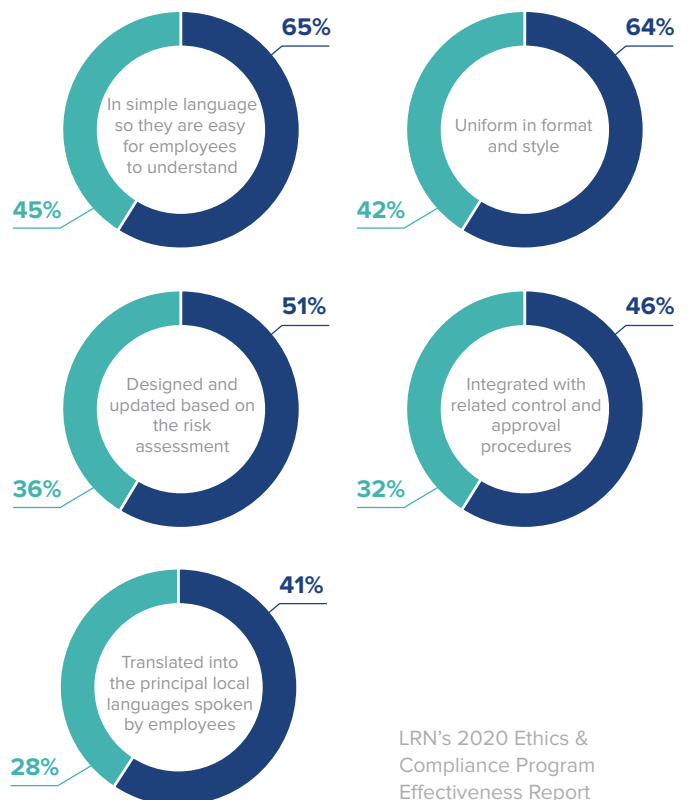
- Have the policies and procedures been published in a searchable format for easy reference?
- Does the company track access to policies and procedures to understand what is attracting more attention?
- Are policies and procedures updated to reflect evolving risks?

LRN's policy simplification solution provides an opportunity to implement DOJ guidance in an impactful manner. It reorients policies towards clarity, helps align various stakeholders, expresses company values in operational terms, and engages employees in the process. It can also help facilitate translations by avoiding jargon and legalese in favor of straight-forward principles and processes.

Our annual research into E&C program effectiveness identifies policy best practices and makes clear that the most effective programs take this approach.

ARE YOUR POLICIES:

■ HIGH-IMPACT PROGRAMS ■ LOW-IMPACT PROGRAMS



LRN's 2020 Ethics & Compliance Program Effectiveness Report

OUR APPROACH

- Redraft policies to focus on behavior and values rather than legal summaries
- Trim verbiage and length and reduce complexity
- Embed links to procedures into policy requirements, creating a “one-stop shop”
- Incorporate user aids such as FAQs, pop-up lists, scenarios, and videos
- Embed links to the hotline and ethics and compliance team to encourage speaking up and asking questions
- Develop a policy template designed to company standards that can be applied to other policies, ensuring consistent look and feel

The result is an interactive policy that guides employees in doing the right thing and streamlines their ability to get things done. Hosting on your internal website facilitates accessibility and provides data analytics on what topics are of particular interest to your employees, and to what areas of the company. are of particular interest to your employees, and to what areas of the company.

PARTNER EXAMPLE

Example for illustrative purposes only.



LRN Inspiring Principled Performance

NEW YORK
745 5th Avenue, 8th Fl
New York, NY 10151
Direct: 646.862.2040

INDIA
Nirlon Knowledge Park Block B6, 3rd Fl
Goregaon East Mumbai, 400063
Direct: +91 22 6151

LONDON
One Heddon Street
London, W1B 4BD
United Kingdom

 @lrn

 /company/lrn

1-800-598-2809