EQS

INTEGRITY LINE COMMUNICATION BEST PRACTICES

How to successfully launch Integrity Line

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When launching a new Helpline, there are generally three primary goals to keep in mind when formulating a communication plan:

01.   Announce the availability of the Helpline

02.   Educate on what it is, how it works, and what the process looks like

03.   Use as a branding opportunity for your Compliance & Ethics program

Two aspects of any Helpline launch should include:

01.   The strategy and tactics of how to communicate the change

02.   Managing change across the organization

This is especially important if launching a Helpline for the first time. Do not underestimate the importance of explicitly explaining what a Helpline is, when to use it, what types of issues should be reported, how the process works, and where to find the Helpline number. For employees to adopt this new concept, you must remove "the mystery" from it.

1. Before the Plan, Do Your Research

If you have an existing Helpline, it is important to conduct an audit of where the Helpline is mentioned (or should be) prior to creating a communication plan. Common areas of mention include:

- Impacted company policies
- Code of Conduct
- Intranet
- Your website
- Training courses
- Physical instances (posters, table tents in break rooms, magnets in conference rooms)

1.1. Identifying Resources & Stakeholders

Prior to building out a plan, identify a budget for the branding of the project. While many communication tactics can be serviced internally with little to no additional cost, most organizations use this as a branding opportunity for the program and arrive at the budget by allocating a dollar amount per employee.

For a successful launch and ongoing effective program, it takes a village. Engage key partners across the organization to ensure the communication plan is socialized and supported. While it varies

depending on the organization, communication audiences can generally be classified into two segments:

- Help/Support - Individuals or teams that will be helping you roll out to the organization or supporting the Helpline/investigation process in some form. This audience will require more in-depth communication.

  - Awareness - Individuals or teams that do not have an active role but should be aware of the change.

Help/Support	Awareness
Compliance & Ethics	Legal
Change Management	Human Resources
Corporation Communications	Corporate/Physical Security
Real Estate/Operations	Compliance & Ethics Committee
People Leaders	C-Suite
Internal Audit	IT/Information Security/Privacy
Marketing	Employees
Risk	Regulators
Supply Chain	Third Parties
Liaisons or Champions	Board of Directors
In-country compliance partners	Awareness

1.2. Building the Communication Plan

Build the communication plan to include a list of tactics and timing for implementation. The communication plan should comprise of messaging, physical instances, branding, measurement, and ongoing awareness.

1.2.1. Messaging

Initial communication to employees should include an announcement from top management about the program's goals and the reason for implementing it. The tone at the top is crucial in the launch of a new Helpline. International communications should be coordinated with in-country resources to ensure effective localization of the messages and images. All messaging should clearly announce the availability of the Helpline and where to access it. Messaging should educate on:

- The importance of speaking up

- What the Helpline is
  - The value it brings to the individual and the company
  - How it works
  - What anonymous reporting is
  - What the reporting process looks like
  - When to use it
  - How they are protected against retaliation

1.2.2. Physical Instances

Do not underestimate the impact a physical reminder with the Helpline information has on the long-term success of the Helpline.

- Cost-effective ideas for passing out to employees include:
- Badge cards with the values/Helpline info
  - Pens
  - Post-it pads
  - Stress balls
  - Stickers (for laptops or water bottles)

Other physical branding ideas:

- Magnets in conference rooms
- Table tents in breakrooms/cafeterias
- Posters in bathroom stalls (it works)
- Graphical messages on flat-screen monitors in high-traffic areas
- Email signatures
- The back of business cards
- Stickers on the floor by building entrances/exits
- A dedicated section on the front page of the intranet
- Design a "speaking up guide" for employees to understand how the process works
- Ethical leader toolkit for leaders to understand their role in the process

Another innovative idea is to hold a launch party at the main company locations on Day 1. Much like an "Ethics and Compliance Week," organizations use the launch party to develop a theme for the day or week) and have a series of events such as:

- Door greeters passing out a giveaway
- Email message from the CE
- Article on intranet (Stories to demonstrate organizational justice at launch and going forward)

- Creating a video with a senior leader to discuss the importance of the Helpline. One customer used an actor in an interview format to talk about their actual experience using the Helpline (it was a huge success!)
  - Developing a screensaver/prompt on screen at computer login
- Utilizing an internal social media campaign. Ideas include informational posts, trivia posts (e.g. name one place where you can find the Helpline number and give a prize to the top 5 that respond correctly first), virtual scavenger hunts, etc.

1.2.3. Branding

Consider branding your Helpline to make it more memorable, and approachable for reporters. Examples include:

- Rio Tinto's "Talk to Peggy Line" (Peggy is the head of E&C)
- British Telecom's "VeRoniCA" (Virtual Regulatory Compliance Assistant)
- Microsoft's "Integrity Portal"
- AARP "Your Voice"
- "Code of Conduct Line"
- EQS "Helpline"
  - "Ethics Line"
- "Speak up Helpline"

1.2.4. Measurement

If time allows, consider using your organization's culture survey or internal audit process to assess employee awareness of internal reporting resources PRIOR TO the launch of your new Helpline. This gives you a baseline measurement that you can use to compare in a follow-up survey or assessment 6 months post-launch.

Quantify the success of other communication tactics with measurements such as email open rates, browser click rates, average time spent on web pages, employee sentiment on internal social channels, reporting volume, etc.

1.2.5. Beyond Day 1

As you move beyond Day 1, consider how the Helpline can be incorporated into existing company training. Typical focus areas should be:

- Employees (individual contributors)
- Leaders
- Compliance partners (HR, Risk, Audit)
- Third parties (suppliers, contractors, vendors, etc.)
- New employee orientation

It is imperative to keep the message alive through regular, consistent messaging. As with any marketing campaign, the first step is deciding which behaviors are desired and the key messages that will help motivate these behaviors. Employees should feel a sense of empowerment in having the courage to speak up, so communications should both educate and empower. Messages should include:

- Behaviors that are expected (i.e., conducting business in a legal and ethical manner)
- Behaviors that the company does not condone (i.e., illegal and/or unethical behavior)
- What to do if they are aware of unacceptable activities. This aspect of communication must include information about all the available avenues for reporting unacceptable behavior. This ensures people are aware of their options
- How to access the anonymous Helpline
- What happens when you call the Helpline

Innovative ways to keep the message fresh include:

- Video blogs
- Using templated slides that senior leaders would use in an organization stand-up or quarterly meeting
- Highlighting the intranet sanitized stories of actual issues and how they were resolved
  - This does not have to be a story about an employee getting fired. It can also be used to tell a positive story about how one employee's report positively impacted the company culture, be it by identifying a process gap, a policy improvement, or other cultural change because of speaking up.
- An ethics award for employees that had the courage to speak up

1.3. Recommended Communications Timeline

Time to Launch	Activity
>1 month	Coordinate with Change Management and Corporate
1 month	Communications teams to develop communication plans and tactics
1 week	Identify stakeholders and related messaging
Day 1	Identify Helpline mentions
Month 1	Communicate "pre-launch" awareness of change to internal partners
Ongoing monthly or quarterly messaging	Message to leaders