

ELEMENTS OF AN EFFECTIVE COMPLIANCE AND ETHICS PROGRAM

1

POLICIES AND PROCEDURES

- Put policies in writing and use them as the foundation for your entire program

2

COMPLIANCE OVERSIGHT

- Delegate a compliance officer or compliance committee to oversee and report to the board.

3

TRAINING & EDUCATION

- Create effective, ongoing training methods and establish open lines of communication.

4

REPORTING AND INVESTIGATING

- Encourage employees to raise concerns and have investigative procedures in place.

5

MONITORING & AUDITING

- Use internal tools to evaluate program effectiveness and detect criminal conduct.

6

ENFORCEMENT & DISCIPLINE

- Establish appropriate incentives for compliance and disciplinary actions for violations.

7

RESPONSE & PREVENTION

- Resolve identified problems promptly and add related issues to monitoring activities.

8

EVALUATE EFFECTIVENESS

- Ensure your program covers the four basic pillars: credibility, measurable results, accountability and continuous improvement.