

# BUSINESS COMPLIANCE

Governance – Compliance – Ethics

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GOVERNANCE

**ANTHONY SMITH-MEYER**

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## GRAVITAS: THE NEW WEAPON OF COMPLIANCE



*By Lesley Everett*

■ Messages in recent regulatory and compliance conferences have had a tendency to be repetitive. The regulated complain of over-regulation, the regulators complain of laxitude in implementation. What has been absent is debate on how best to effect change for better behaviour. Instead there is a focus on the negative. How is it that the executive of banks have failed to control their price-fixing dealers and traders? How could the systematic development and integration of a “cheat-chip” have occurred in a quality conscious car company? Refreshing then to see a company seeking a Compliance Officer with Gravitas. Dictionary definitions aside, here is a recognition that first impressions count if you wish to embody a principle, dare we say a brand? In this article, Lesley Everett brings her considerable knowledge of personal branding and applies it to the mission facing the Group Compliance Officer: to influence through mere presence.

■ We all accept that corporate branding or the branding of any organisation today is, firstly, important and, secondly, more important than it was. It is no longer only about the logos, the advertising, the sponsorship, the website – it is more about people behaviours than ever before. In fact, it wouldn't be considered as going too far out on a limb to say that an organisation's brand today is what its

stakeholders (whether clients, partners, investors or employees), say about the brand to their contacts. The experience they have with you, that they talk about, will always come through most strongly in their face-to-face interactions with you.

### **Branding and influencing change**

There are a considerable number of initiatives ongoing to encourage culture

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change, particularly within the financial sector, but elsewhere equally so. The OECD have their Trust and Business Project,<sup>1</sup> The UK Financial Reporting Council have their Culture Project,<sup>2</sup> the Dutch regulators (De Nederlandse Bank) are long standing proponents of culture change and their ideas are spreading throughout Europe, including within the EU Commission and banking supervisory institutions. If culture change is on the agenda, as with branding, what is compelling it is what is observed rather than what is said – then it is time to think about what people see when culture change agents enter the room. Not surprisingly then when a recent job advertisement for a head of compliance position requiring the candidate to have *gravitas* went “viral” within the compliance community.

After all, just how often do we put the necessary effort into managing the behaviours and appearance of our people, at the level that is clearly needed if you believe there is a link between credibility and personal experience?

#### **First impressions and all that ...**

You’ve all been there. Remember walking into the reception area of a new potential employer or business partner. The immediate impression was that of high quality; fresh and inviting. Then you arrived at the desk and waited to be acknowledged, for just that bit too long. Eventually the receptionist, looking just a little bored and disinterested, looked up and said “yes, can I help you”? Even worse if you introduced yourself to her on a previous visit recently. Now how did you feel, still feel, about the company?

I would suggest that because this interaction was personal, you feel less than enthusiastic about the quality of that company. You quite possibly are sub-consciously thinking that the company doesn’t really care about its people or the people they deal with, therefore what are they really like to work with? Their advertising and social media campaigns imply one story, but your experience demonstrates another.

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1 <http://www.oecd.org/daf/ca/trust-business.htm>

2 <https://www.frc.org.uk/Our-Work/Codes-Standards/Corporate-governance/Culture-Project.aspx>

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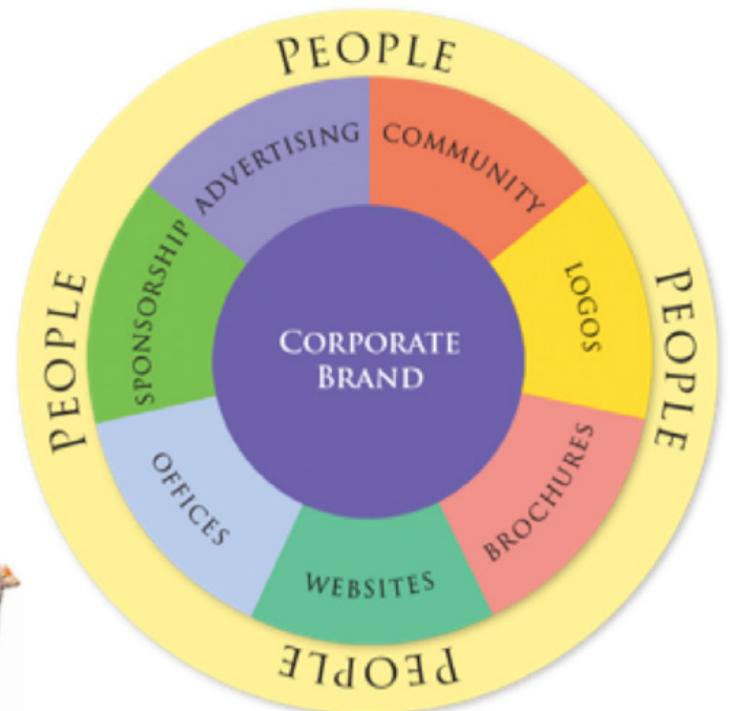
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#### The Corporate Brand Reality

Now consider this scenario in a different setting. A business colleague approaches the compliance department with a query. Having passed through the security door installed as part of the information barrier precautions, she wanders down through a dark corridor and into a cramped, open plan office filled with compliance analysts pouring over reports and gazing into their screens. She looks for something that might resemble a reception desk, or at least a helpful face. The body language however is clear: nobody raises their head – too busy.

#### **Brand – It's who you are**

These are simple, non-sophisticated examples; however trust and respect in your reputation, brand and standing today does not come from the traditional methods. It comes from the people within your organisation and how they communicate in all forms, to all stakeholders. Your strongest brand messaging today in the eyes of your customers and stakeholders are your people; they are your brand. Yes of course you need the heavy investment in your websites, training and events delivery and all your awareness material, which serve



to create expectations and lay out the value, mission and guarantee of quality and “brand” integrity. The true brand value you represent to others though, is in the experience your colleagues take away with them and ultimately remember and talk about.

There is a gap emerging between what is the advertised strategic intent of compliance departments, such as partners, trusted advisors and guardians of integrity within the firm, and the actual actions and behaviour that focus on monitoring, control and enforcement. Compliance departments are going to be impacted dramatically unless they sharpen up their approach to managing the real life experience that stakeholders have with their brand. The personality of the brand as reinforced via people with congruent and authentic attitudes and behaviours needs to be in alignment with the mission it is accorded.

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#### **Moving from piano player, to composer**

With expanding budgets for activities that monitor and control business activity, which are viewed as obstructive rather than constructive, and a messaging on integrity and conduct that are not backed by a culture of accompaniment on the part of compliance staff “playing the piano”, this gap is forever increasing and is likely to become a sinkhole to employee loyalty, collaboration and ultimately employee behaviour and misconduct. No wonder then that we start to look for compliance officers with “gravitas” – a presence that projects the brand of integrity and authority that Compliance needs to be effective.

We are at a point in our business environment, where we need to re-align the corporate culture with that expected by our employees, clients and customers – we need to focus on how we walk the talk. In exchange for their loyalty and support, employees demand trust, respect and a level of ‘personality’ from those they choose to consult and build relationships with. However, conversely what is happening in some quarters is

a slide towards the other extreme, of corporate bad manners and apathy in the way colleagues communicate with each other. To paraphrase Warren Bennis, the pressure to do the job right, is overtaking the duty to do the right job. The barriers raised can seem more than mere protection of insider information, they become a culture barrier reinforcing the sense of “them and us”, resulting in loss of trust and cynicism. Communication turnaround and response times with stretched compliance departments are getting longer, and call waiting times extended and attention less personalised. In turn, this can create a significant roadblock between your interest groups and your brand, and the success you strive for, need and indeed work hard to achieve.

#### **Brand and the individual**

Some companies will provide a level of training for compliance staff around the values they are meant to project as their “brand” and how to ‘live’ these.

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*To paraphrase Warren Bennis, the pressure to do the job right, is overtaking the duty to do the right job*

In my experience this never goes deep enough for people to interpret and internalize them in a way that makes it easy and authentic for them to behave and communicate in alignment.

Motivating and engaging people to ‘live the brand’ and address the challenge and imbalances of the workplace requires a methodic and systematic approach to employee development. We need to focus on defining an individual’s core authentic brand, refining that brand and packaging and projecting it effectively in a way that reinforces the brand and values espoused by the company and its premier ambassadors, the piano players, the compliance department.

The only way we can really get individuals to ‘live the brand’ is by addressing the ‘what’s in it for me’ factor and giving them notions of purpose that they themselves can make sense of and utilise in their everyday lives and interactions, not just at work.

Often, companies talk about wanting more charisma and gravitas amongst their leaders. This is not easy to define.

However, we could describe it using the words confidence, self-awareness, positive and authentic impact, etc. Developing a powerful personal brand can really help achieve this.

**The world is an oyster  
– or are you the oyster?**

There are seven principles that teams and individuals can use, not only to clarify their own personal brands, but also to package and project that brand consistently. We call these principles the 7 Big Strides.

Imagine a pearl in an oyster – it grows organically over a period of time as layers get added to it. This is similar to your Personal Brand. Every interaction you have, verbal and non-verbal, creates a layer that over time defines your brand and reputation in the eyes of others. Every email you send, every text, presentation, meeting or chat at lunch, adds a layer to your brand and it gradually evolves.

It is quite common for us to be unclear about whether the layers added are reinforcing our brand positively and consistently, or whether they are weakening and diluting the brand. This is due to two things: the

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*Every interaction you have, verbal and non-verbal, creates a layer that over time defines your brand and reputation in the eyes of others*

lack of clarity about what the brand actually is, and because we don't think about it or measure it consistently. The pearl analogy can help us to keep on track and create a conscious focus in our minds as to the messages we want others to know about us and think about us as our brand. Without this line of thinking, it is difficult to remain conscious of our brand and to keep adding the layers in a strategic or perhaps deliberate way.

#### **The Living Brand**

There are many analogies we can use for personal branding, however a tree and its hidden roots explain it well. Often hidden beneath the surface are our true values, our character traits, our strengths, drivers, beliefs and motivators. Others don't see them clearly because they are hidden or obscured, yet they represent the DNA of our personal brand, beliefs or our authentic core. Also I would suggest you are not entirely clear about them yourself either. We don't tend to spend time on defining our values or what our brand stands for, therefore it is left to chance a great deal.

The branches and the leaves of the tree represent the visible elements of our brand

– people see these every day and judge us on them. Elements such as our appearance, body language, voice, interaction with others, attitude, written communication, social skills and presentational skills are seen, experienced, talked about and in turn create perceptions about us every day. These perceptions can be slightly or significantly 'off-message' with our actual authentic brand.

#### **The 7 Big Strides**

Let's have a look at each of the 7 Big Strides in turn and provide some practical tips for each one to help you along the way:

##### ■ **WHO YOU REALLY ARE**

This is the starting point. A strong Personal Brand has to be authentic so that it can be more easily maintained and sustained. Unless you build your brand from your authentic core you are unlikely to be consistent, and inconsistency creates mistrust and a perception of insincerity. Allocate a couple of hours to yourself where you can reflect on your values, talents, strengths, drivers and motivators. Think about what you truly stand for and what's important to you in your life and career now. Values are not so easy to clarify, so

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*It takes 7 seconds  
to make an impression  
on somebody*

think about what drives you mad about others, what they say and do, and then turn that around. For example, if it irritates you when others turn up late for meetings, it may mean that respect for other peoples' time is important to you – and is a value.

You can ask yourself:

- How do you most like to spend your time and why?
- What do you get most of your energy from doing?
- What inspires you most?
- What do you set goals on most?
- What do you dream about most?
- What do you enjoy doing most, at work and at home?

Try to get as much written down as possible, and make sure you keep it all positive. It's easy to come up with weaknesses, but for now we are focussing on the positives.

Now you can put this to the test a little. Ask several others to give you 3 words that describe your brand. How do these compare with what you have written

down about yourself? Are there any similarities or are they all different? In the perceptions of others you can start to see where the gaps are as compared to how you see your authentic brand. Use other feedback you may have such as 360 degree feedback and appraisal reports. These gaps will provide you with the start to an action plan for development.

■ **RIGHT FROM THE OUTSET**

It only takes a few seconds to make a first impression, and many subsequent interactions for it to be changed. It takes 7 seconds to make an impression on somebody. Initially others will take in the non-verbal communication (body language and appearance); then the quality in the voice and then what you actually say. If they like what they see and how they hear it, they will hook into the context much more quickly.

Try to get first impression feedback whenever you can – it's not something that we are freely given. A study by the Professional Image Institute found that it can take a further 21 experiences with someone to change a first impression. On first thought that sounds high, however

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we do hang on to the first impression we have, and it takes a lot to shake it off. In the fast-paced and visual world we now live in, the first impression is probably made even quicker than 7 seconds and even 10 milliseconds has been suggested as we scan somebody in very quickly on first meeting them.

#### ■ VISUAL BRAND COUNTS

Whether we like it or not, our non-verbal communication (dress and body language) give clues away as to our personality in the eyes of the beholder. Think of it as the packaging of your brand. Others sub-consciously see our appearance as a choice, therefore it is viewed as a reflection of our personality and character in their eyes.

Ask yourself if your wardrobe choices are an extension of your personality and present you in the best light, or do they get in the way of your true qualities and abilities perhaps? Is it time for an update to reflect the real professional and authentic you are now? Fashion historian James Laver once said “Clothing is the furniture of the mind made visible”. We do feel as though we get something about the persons

personality and character from the way they dress, so make sure your wardrobe works for you and not against you.

Some short tips:

- Always ensure good fit – no matter what you wear and how much you pay for it, you will never look well-dressed or be as credible as you want to if you don’t pay attention to these details.
- Your mother was right: Watch your shoes – they do get noticed!
- Be appropriate – think about the audience today and what their expectations are of you in the role you are in; the situation and environment and your objectives. If you consider all these points you’ll be more likely to choose the right outfit. Without this conscious thought you’re leaving it to chance. Choosing the right outfit should be a key part of your planning for important meetings and presentations in particular.

#### ■ BE MEMORABLE & VISIBLE

You need to treat your career more like an entrepreneur than ever before. You

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cannot leave your own PR and marketing to chance any more as unfortunately you will get overlooked as either credible, being of value or of having influence.

Eleri Sampson in her book the Image Factor looked at the 3 biggest factors in career progression today:

- 10% – Doing your job
- 30% – Attitude and behaviour when you do your job
- 60% – Visibility and exposure

Decide on what your professional goals are and who you need to be more visible with and where to achieve them. Create a profile and visibility plan to consciously manage your exposure with those you seek to influence. Do the people who need to know who you are, what you do and what you represent and offer as a partner, really know this?

■ **PRESENTATIONAL BRAND MATTERS**  
Being able to present a clear, succinct and compelling message is becoming an essential element in getting noticed. A Vice

President of a Fortune 100 company once said to me “one’s ability to get promoted rests on one’s ability to present well”. The same can be said of influencing ability. Becoming great at presenting an authentic message is a crucial element of our brand also. Think about getting your own stories into your presentations to reinforce a business message and to make it more engaging. If your compliance presentations are dull your audience will be sure to switch off in minutes, irrespective if it represents emerging risk reporting, core integrity messages or mandatory training. Just present the must-have information in an interesting and engaging way and avoid detailed slides that just serve to detract from you. You and how you deliver your message, your gravitas, are the most compelling part of your presentation.

#### ■ **STATEMENT ‘BRAND ME’**

You need to be able to define your personal brand in a few powerful sentences that become your brand statement. A little like an elevator pitch, but deeper, more personal and hence more useful. You can use the framework of “What I am is [*job title*],

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*If it is gravitas that is needed to influence and direct culture change, then it is the result of a realisation of the importance of Self*

but what I really do is *[succinct overview of what you do]* and as a result *[this is what happens]*. Try to steer away from being too operational in your description and think about what you personally bring as a brand to your role and the team/company that makes a real difference. You may never verbalise this but the exercise in itself will help you to clarify your brand and the value that you bring to the table.

■ **EACH TIME, ALL THE TIME**

Consistency is the key to success with any brand, particularly a Personal Brand. Without this we only create confusing messages. Think about how consistent you are with every form of communication from 1-to-1, group meetings, presentations and written form. Gather some feedback in all these areas and analyse how you are perceived. Is it in line with the brand you want to project and where are adjustments needed?

Your Personal Brand is what people say about you behind your back and your reputation is formed from this. Are you really taking control of yours and what do you need to do today to make sure

your brand is working for you and not against you? If it is gravitas that is needed to influence and direct culture change, then it is the result of a realisation of the importance of Self, and how to render that Self visible in a consistent and authentic manner. ■

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**Lesley Everett** is an internationally acclaimed professional keynote speaker and expert on The Personality of the Brand, and has presented her Walking TALL Methodology in 25 countries across 5 continents to date. She is a regular contributor to UK, US and UAE media, is a published author of 2 books, with the third in production and is an Executive Brand Coach. Her clients include several FTSE 100 companies as well as The United Nations, Bank of America and GE, and various charities and associations. She has appeared as commentator many times on TV in the UK on BBC, Sky, CNN and many others. Lesley is the founder of Walking TALL International, with offices in UK, US, Australia and Hong Kong. She has created a methodology for Personal Branding that has inspired audiences for the past 15 years. She can be contacted at [lesley@lesleyeverett.com](mailto:lesley@lesleyeverett.com). [www.lesleyeverett.com](http://www.lesleyeverett.com)

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