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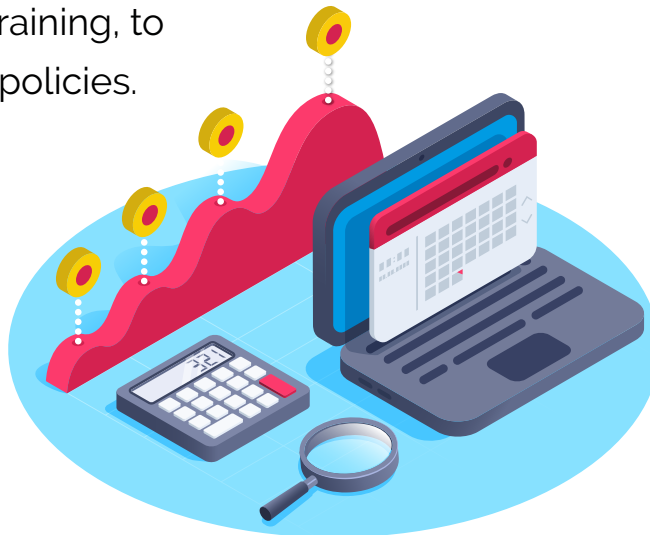
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USE DATA ANALYTICS

Data analytics helps you to see larger trends in the issues affecting the company. Which complaints are submitted most often? Against whom, or from which parts of the corporation? Which ones are substantiated most often, and which ones aren't? The answers to those questions can suggest a range of concerns, from unclear policies, to ineffective controls, to poor training, to weak disciplinary policies.



MONITOR YOUR PROGRAM'S CAPACITY AND PERFORMANCE

Monitoring can assure that your program has the proper resources and skills for the investigations that arise. For example, if you find that many cases end up taking longer than expected or take surprising turns, your triage and scoping, or staffing, of investigations may need attention. If certain subjects always end up unsubstantiated or indeterminate, your investigators might not understand the issues involved, or you may need to improve the depth of your intake or employee trust in your process.

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Managing the Investigations Function

PERFORM ROOT CAUSE ANALYSIS

For any serious matter such as financial fraud or corruption, perform a disciplined root cause analysis to understand why the misconduct happened — it could be for reasons very different from the proximate cause, and the remediation to fix that weakness might be different from what you'd expect.



LOOK FOR AREAS OF IMPROVEMENT, AND IMPROVE THEM

Department of Justice guidance on effective compliance programs and U.S. Sentencing Guidelines both stress the importance of periodic assessment of the program's effectiveness. That's just as true for investigations functions as it is for the rest of the compliance program. The most immediate areas of improvement might be better intake of complaints, for faster triage; better training and guidance for how certain matters should be handled; faster reporting, and the like.

Conclusion

INVESTIGATIONS WILL ALWAYS BE A PART OF CORPORATE COMPLIANCE PROGRAMS

Each case is unique, but as leaders we can add reliability, accuracy, and predictability by managing the predictable and repeatable aspects of the program. The management of those cases succeeds by following basic principles of good investigative practice, good management, and good use of technology.

Investment in the quality of your investigations performance supports the success of the company, certainly. It's also an investment in a culture of trust and transparency that makes each employee better positioned to support the strategic direction of the whole enterprise.

That's yet **another way compliance programs can provide a strategic advantage to their organizations** and help to drive performance forward.



About Ethico

For more than 20 years, Ethico has put our customers and the quality of our work before profits to become the leading provider of ethics and compliance (E&C) solutions and second- largest player in the space. Our clients trust us to listen to their employees and empower us to assist in the identification of unethical, illegal, and questionable behavior.

In building this trust, we have provided compliance solutions in 50,000 locations to more than 6 million employees in 100+ countries through our highly-trained, caring, and compliance-minded professionals.

We have helped E&C leaders investigate nearly 10 million reports, offering employees the industry's leading-edge tools to report unethical or illegal behavior free from retaliation.

Our client companies include Fortune 500 companies, such as International Paper and AT&T, a higher concentration of risk-conscious industries, including 6 of top 7 US healthcare systems, and brands of all sizes who value their people and their impact, like Johns Hopkins University, Raytheon Technologies, Blue Cross Blue Shield, and numerous county and city governments.

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