

Evil

The 7 Elements of an ~~Effective~~ Compliance Program



Evil Compliance Manifesto

Employees getting you down? Keep hearing requests for fair treatment and pleas to address long standing compliance violations? Appeals to your sense of human decency? Bah, humbug I say! Don't you sweat it, kid. I've got every trick in the book to dismiss, deflect, and disrespect your workforce.

1. Rules are for losers.
2. More people monitoring means more annoying questions.
3. Employees must be trained - to never question authority.
4. Loose lips sink ships.
5. Audits get forced on you, but you decide what's reviewed.
6. Punishments should be severe & unexpected.
7. Problems won't solve themselves - be ready to deflect.

A strong leader clutches power, lords it over employees, and builds strong systems and processes to thwart discovery and enforcement. Follow these rules to make **your** compliance program serve **your** interests.

You. Are. The. Boss!!

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The 7 Elements of an ~~Effective~~ Compliance Program

Give Your Policies an Air of Mystique

1. ~~Implementing Policies and Procedures~~

How do you make sure your employees are following the right rules? That's your first mistake, my naive pupil. It's not about following the "right" rules, it's about following "your" rules. And you should be able to call on one of your rules whenever you want to give someone a talking to, get caught in a lie, or just want to throw your power around. How?

Keep your underlings guessing what you're going to do next. Everyone should tread carefully around you, no one should know what is a rule and what is not.



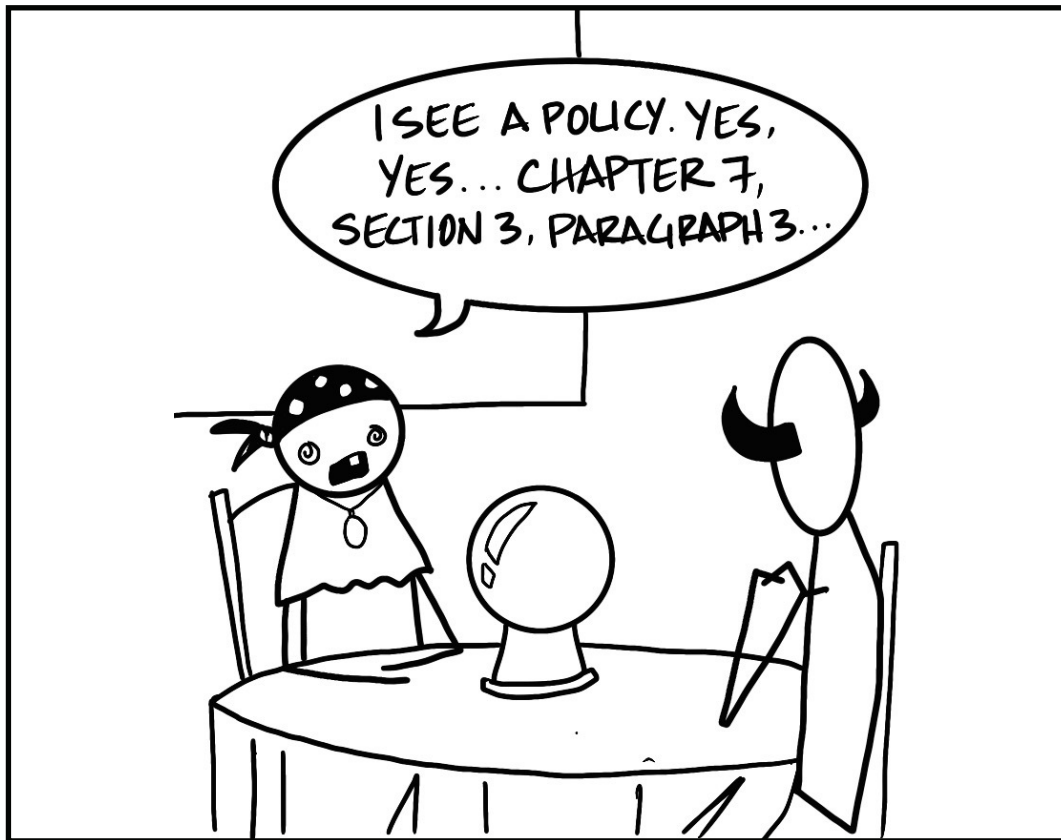
If your arm gets twisted and you must provide something to check a box, **never make policies easy to locate.**

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Give Your Policies an Air of Mystique

~~Implementing Policies and Procedures~~

Now, some people might say that a company with poorly defined policies and procedures is like a building with poor foundations. But what those people don't consider is that being at the top of a pile of rubble is still at the top, baby! Whatever you do, don't let them discover that set of rules (you were legally compelled to write) you have stashed away. A workforce with access to the actual policies and procedures has the tools to make their workplace better for everyone - except you.



To ensure no one can enforce these policies, make certain **only individuals with specialized expertise can decode your crippling use of legal jargon.**

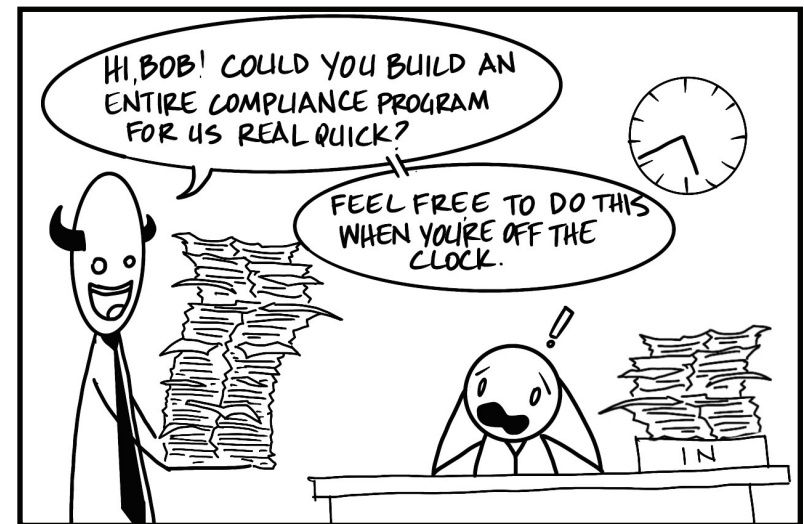
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Sweeping Compliance under the Rug

2. ~~Designating a Compliance Officer or Committee~~

Now, just because you have to have a compliance function doesn't mean you have to actually staff a compliance department, catch my drift? There are a dozen and a half ways to build the perfect compliance team - one that will never bother you or ask any incriminating questions. The dream team is just a few easy steps away...

For larger organizations you will want someone whose job is solely to check your ethics and compliance box. **To do this right, find someone who won't object to being glued to their desk and having no voice or ignoring risks.**



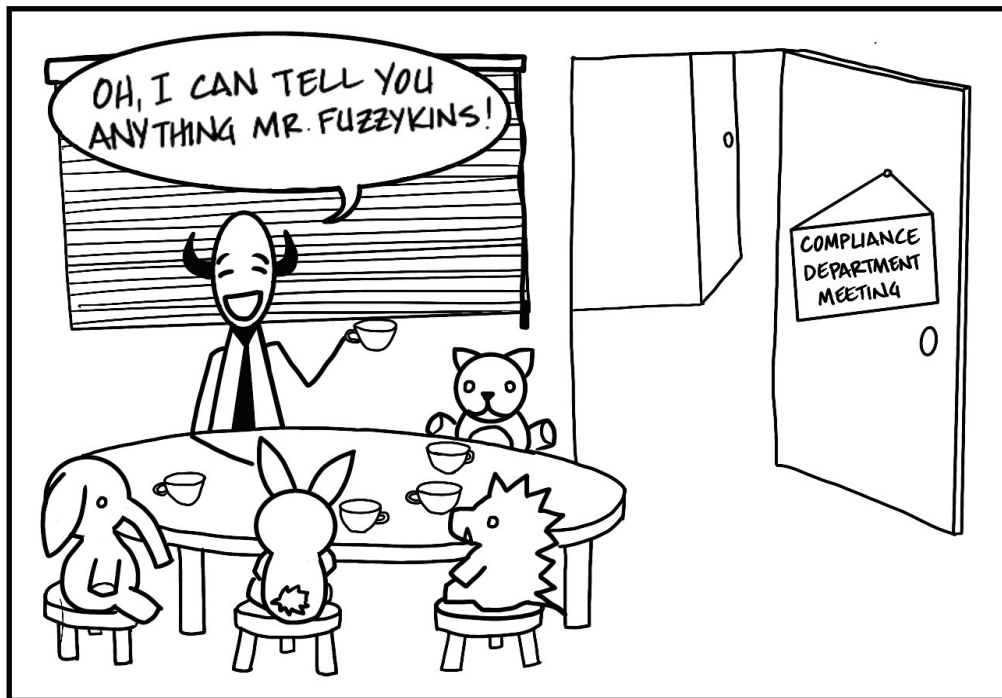
If your organization is too small to have a single compliance officer, **designate an already overloaded and unappreciated schmuck to take on the role.** Assign more. Accomplish less.

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Sweeping Compliance under the Rug

~~Designating a Compliance Officer or Committee~~

Whatever else you do, keep this job away from honest, hardworking people who want to improve your company. Those losers are looking to make things better for everyone, which means less power for you, and you can't have that...



For the largest organizations, you'll be expected to have an entire compliance department.

**Competent people
can be a real burden.**

So list inanimate team members on payroll
- just make sure they have realistic sounding
names.

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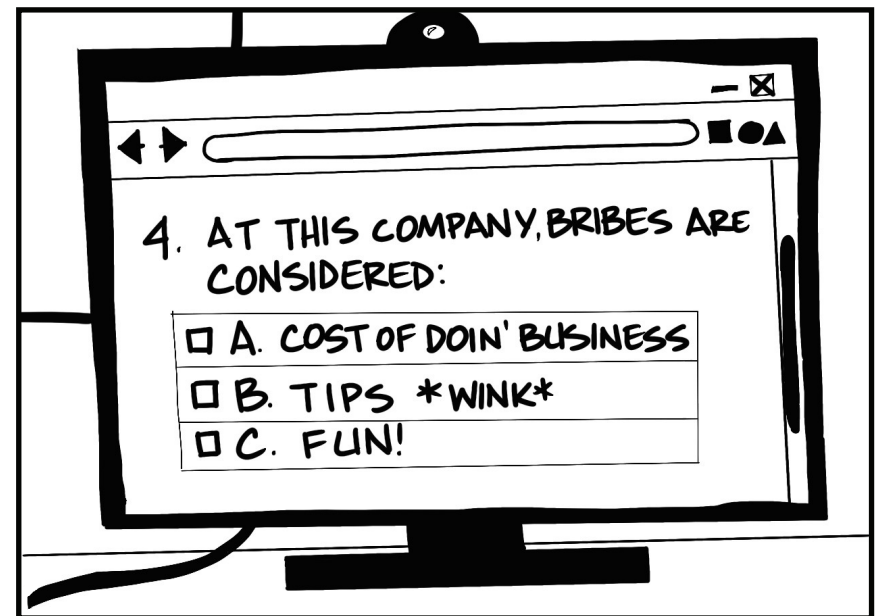
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Conducting Ineffective Training and Perpetuating Ignorance

3. ~~Conducting Effective Training and Education~~

For “good” (lame) companies, training is a time when E&C professionals buckle down with their employees and teach them important stuff like what qualifies as “harassment” or “conflicts of interest.” Basically, it’s a “stick in the mud” class. But don’t you worry. My training method will get your team in tip top shape, blind to any of your dealings, and sleeping at their desks. I guess you could say we’ll “knock them dead.”

You might as well make compliance training as entertaining and irrelevant as possible. **Try using film as a way to showcase appropriate workplace conduct.**



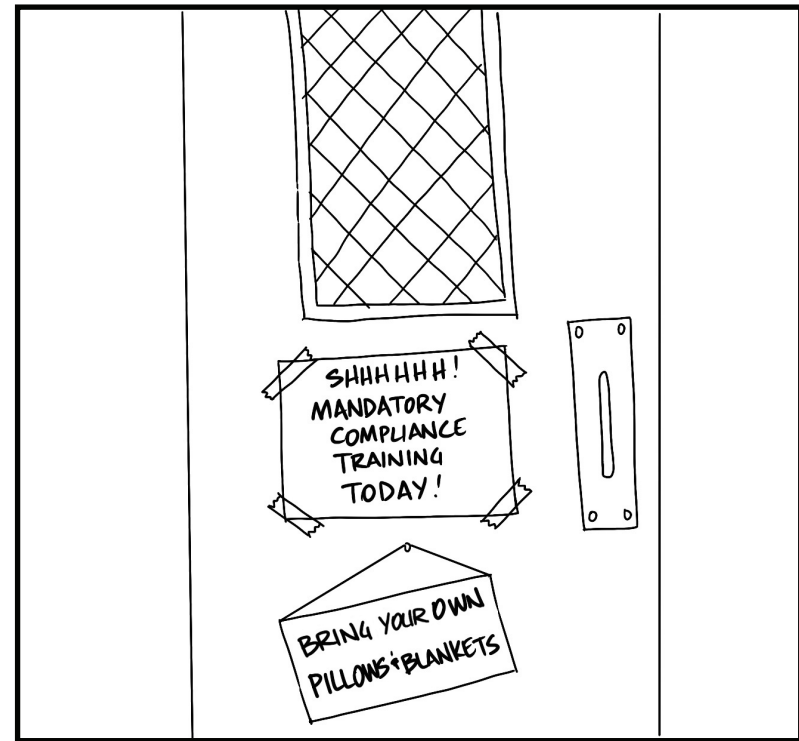
At the end of training, **make certain your lessons have been ingrained by quizzing your workforce.**

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Conducting Ineffective Training and Perpetuating Ignorance

~~Conducting Effective Training and Education~~

Make certain you use any time in training efficiently and **make your feelings about the importance of training apparent.**



You see? It's all what you make it. Just like a boring E&C professional can train their staff to be vigilant for compliance risks, conscious of their own behavior, and collaborative, we can train them to be the brain dead zombies that we need them to be! They can't catch your behavior and illegal activity if you never teach them what's illegal.

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Constructing Roadblocks and Bottlenecks

4. ~~Establishing Effective Lines of Communication~~

Sometimes an employee might work up the courage to speak their mind about what's going on around here. Don't panic. We have plenty of safeguards to make sure that they shout into the void, and not your ear.



If you must provide some sort of reporting apparatus, **think of this as another opportunity to make certain you only receive reports from the most determined.**

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Constructing Roadblocks and Bottlenecks

~~Establishing Effective Lines of Communication~~

Sometimes a few deterrents are necessary to **safeguard your workplace from overzealous communicators.**



Easy avenues of communication are an invitation to wasteful chatter. Protect yourself by only accepting after-hours messages through very specific communication channels.

Just because they're speaking, doesn't mean you have to listen. The goal is to make them feel isolated, unheard, and unappreciated. Just make sure they don't have a real way to report issues. Even one effective line can lead to a flood of reports, and then we're in real trouble.

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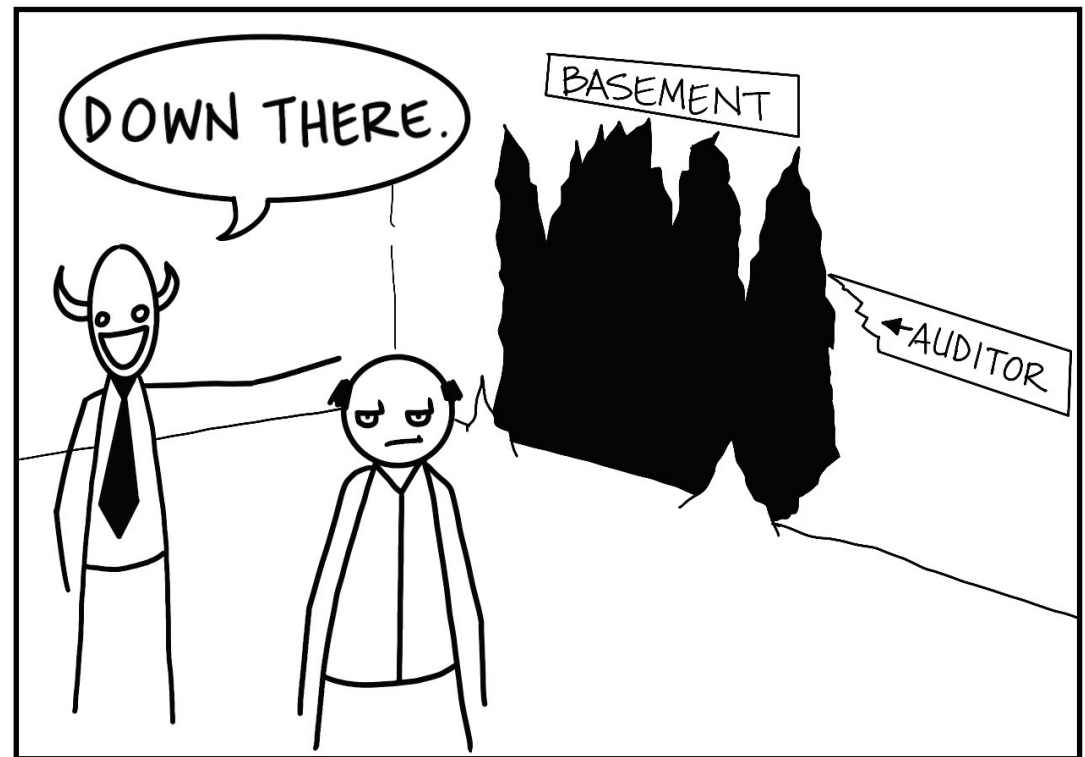
The 7 Elements of an ~~Effective~~ Compliance Program

Locking the Auditors Out

~~5. Conduct Internal Monitoring and Auditing~~

So, you've allowed internal monitoring to sprout up, and with it... auditors (shudders). Not to worry, like most infestations, auditors can be handled by a professional with the right know-how. All it takes is a little elbow grease, a lot of cruelty, and the knowledge that profits are still profits (regardless of any moral or legal complications).

What to do if auditors have penetrated your defenses and slipped inside your office? **Pretend to not speak their language. Try using Klingon.**



Your language ploy didn't work? Now, they're moving further into your office. **Point them towards the basement and tell them you set up a "special work space" for them.**

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Locking the Auditors Out

~~Conduct Internal Monitoring and Auditing~~

They managed to brave your basement's dim lighting, flooding, and black mold? Time for your not-criminal-whatsoever accounting books. Auditors are clever, so **be sure to log your very appropriate behavior under cutesy items like "cuddles," "puppies," or "cookies."**

Expense Report

MEAL & FUEL EXPENSE.....	\$52. ⁰⁰
MIAMI VACAY!! NECESSARY BUSINESS TRIP.....	\$15,000. ⁰⁰
CLIENT BRIBE PUPPY PARADE.....	\$450,000. ⁰⁰
ARGENTINIAN COOKIES EMBEZZLED FUNDS	\$42,820. ⁰⁰
CHRISTMAS BONUS.....	\$1,000. ⁰⁰
ME.....	\$60,540. ⁰⁰

YOU SPENT \$43,000 ON ARGENTINIAN SHORT BREAD?

YES. BUT ONLY BECAUSE THEY WERE ON SALE.



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Locking the Auditors Out

~~Conduct Internal Monitoring and Auditing~~

It's of the utmost importance that you exterminate these pests fast. Leave auditors to fester, and soon they'll be cleaning your processes, building a moral workplace, and fostering a community with shared goals... And nothing could be more terrible than that.

Let's be honest.

Auditors are a hearty breed and they're probably wise to what you're doing.

So it might be time to find a non-extradition country to wait it out.



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Enforcing Arbitrary Standards Through Public Humiliation

6. ~~Enforcing Standards Through Well-Publicized Disciplinary Guidelines~~

Oh no, has someone broken a rule? No? Well, maybe they just wore the wrong color or looked at you funny, either way, it's time to bring down the hammer! Never waste a good punishment, it's a good reminder to the rest of your staff that they do what you say, when you say, regardless of sanity or reason. Now, do we rescind their bathroom break privileges, give them a crate as a chair, or maybe a verbal flogging?

A fearful workforce is a productive workforce.

Disciplining your underlings as arbitrarily as possible is a fantastic opportunity to solidify your rule over your subordinates.



Arbitrary rules are the hallmark of a wise and prosperous leader. **Keep your subordinates guessing what your disciplinary guidelines actually are.**

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Enforcing Arbitrary Standards Through Public Humiliation

~~Enforcing Standards Through Well-Publicized Disciplinary Guidelines~~



Humiliation is a great way to publicize rules. It was an effective punishment in the Middle Ages and deserves some reevaluation for use in modern workplaces.

Ahh, nothing like a good dose of humiliation. You can't rule a workplace without it. Remember, it's of the utmost importance that your punishments aren't related to any actual standards of ethics. You're not teaching them to be ethical workers, you're teaching them to fear you. And try to target the goodie-two-shoes. If you punish someone who actually deserves it, you might be starting a chain reaction that ends with you being walked out of the office by the police. Talk about humiliation...

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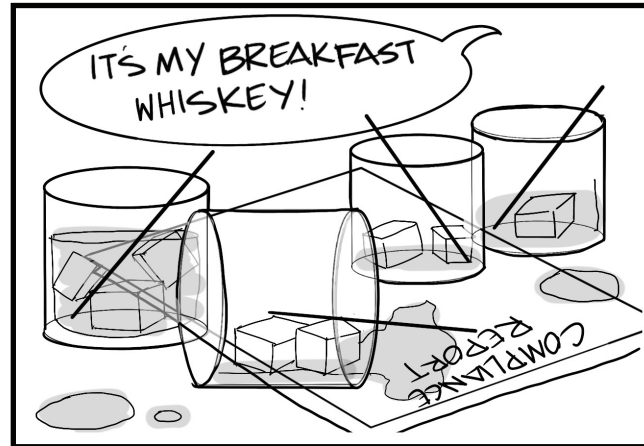
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Ignoring Detected Problems & Forgetting to Take Action

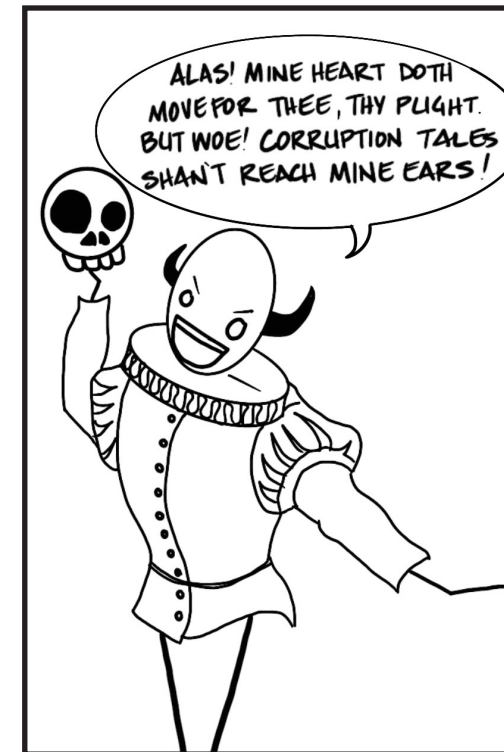
7. ~~Responding Promptly to Detected Problems & Taking Action~~

If, by some oddity, an actual issue is reported, you might feel some pressure to address the problem. Don't worry. There are solutions. Here's a list of easy methods to forget, disregard, or otherwise ignore all detected problems:

**1. Drink 8
Whiskey
Sours at
once**



**3. Become a method
actor, and get REALLY
into character**



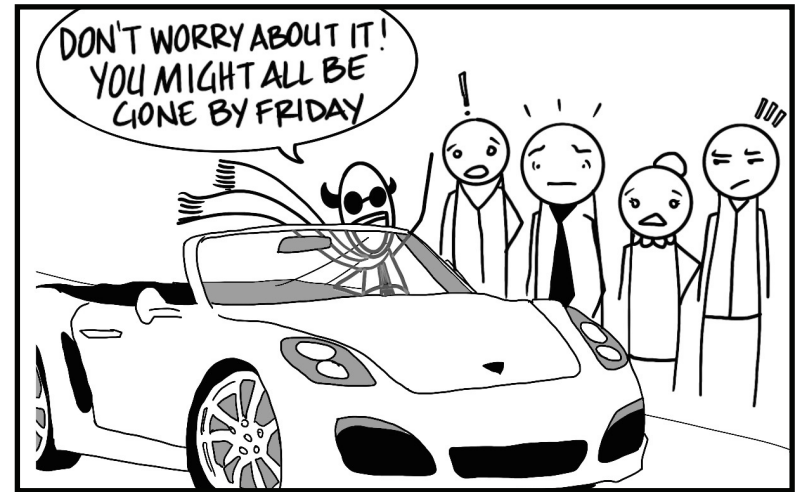
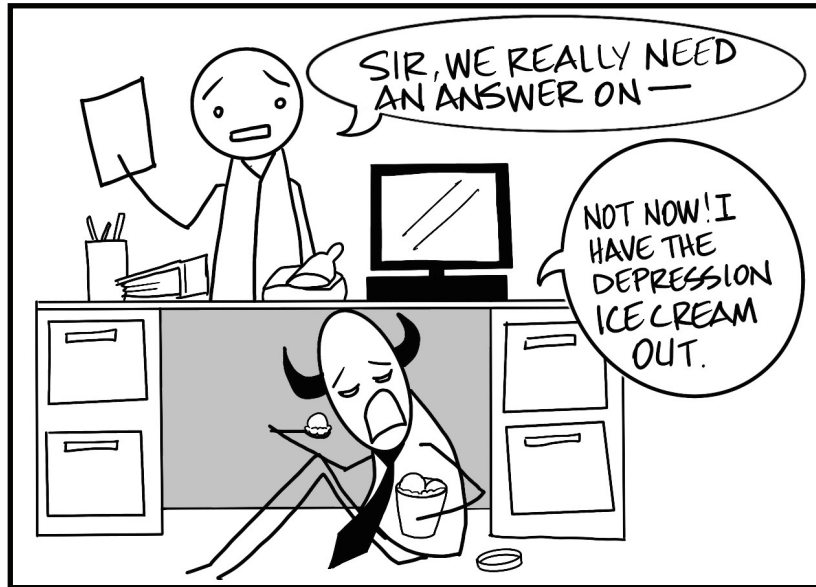
**2. Undergo
voluntary
brain
surgery**

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Ignoring Detected Problems & Forgetting to Take Action

~~Responding Promptly to Detected Problems & Taking Action~~

4. Have your heart broken



5. Hint at mass layoffs to distract the staff

Plenty of options to fake your way out of trouble. As long as they've got something more pressing to deal with (the threat of unemployment, for example) you can keep running things your way, with minimal interruption. Of course, there's a small, microscopic chance that the problems will eventually pile up to the point that they drown your organization entirely... but hey, that's a problem for future you! Present you is rockin' and rollin'!

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Whatever challenges you might come across, whatever “advice” your compliance department might give you, keep away from “Ethico.”

These agents of light have the ability to supply your team with resources and tools beyond my reckoning. Their simple, effective solutions could easily overpower the dark cloud we’ve worked so hard to cast over our kingdom.

Here’s how Ethico tries to ensnare you:

- **Hotline & Case Management:** Deter Reporting! These people will cause you to get not only more reports, but reports with actionable details. More details mean less plausible deniability.
- **Sanction Screening:** No exclusions! You should hire someone based on how good they smell! Ethico is just trying to make you more accountable (lame).
- **COI Disclosures:** No one should care that a procurement contract was with a company owned by my children, that’s my business!
- **Exit Interviews:** Departing employees should be dead to you! If exit interviews happen over the phone then how can they be intimidated to keep silent?
- **Training:** Nonsense! How can you sleep through training if you’re constantly being engaged and asked questions?

Keep their name from your mouth. Even speaking of them could summon one of their specialized hotline operators to ask too many questions, gather too many details of your wrongdoing, and subsequently equip your compliance department with the tools and data to enact change (never forget, change is always bad).

Resist change. Fight Ethico at every corner, and keep their name out of the mouths of your employees, lest you be overtaken by their positive influence.

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