GAN INTEGRITY

Operationalizing ethics & compliance with GAN Integrity

GAN Integrity

Elevating business ethics everywhere

About us

GAN Integrity helps global organizations elevate business ethics everywhere. We work with the world's smartest companies to help them manage risk, impact behavior and deliver long term strategic value.

GAN Integrity enables enterprises to embed ethics in and around their business, by engaging everyone, from front line workers to third parties and stakeholders on their journey towards ethical business transformation. The Integrity Platform has built-in flexibility to quickly adapt to changing regulatory requirements combined with the ever-demanding ethical expectations of their employees.

GAN enables companies like FIFA, Barrick Gold, Altrad, and Danone to act with integrity.

Shifting the mindset & the changing role of compliance

Organizations of the past were accustomed to viewing compliance as an obstacle to the achievement of operational goals. Viewed from this perspective, compliance was largely seen as an inconvenience externally imposed upon the organization by the overreach of regulators and enforcement authorities.

As a result, corporate compliance functions were often relegated to the periphery, with organizations prone to do the bare minimum to satisfy the most basic regulatory requirements. This resulted in the adoption of so-called "paper-based" compliance programs that paid lip service to the notion that organizations had legal obligations, but in actuality, did very little to detect or deter corporate malfeasance.

A precipitous increase in corporate criminal activity—beginning with the now-infamous Enron scandal and continuing up through the present—led governmental authorities to insist that compliance programs work not only in **theory**, but in practice as well.

In recent years, the centrality of compliance program efficacy has been emphasized repeatedly by key enforcement authorities like the United States Department of Justice ("DOJ"). In 2019, for instance, drawing upon both DOJ policy and the U.S. Sentencing Guidelines, the DOJ released its first-ever departmental-wide guidance concerning the methods by which federal prosecutors confronted with potential organizational misconduct should approach the assessment of the corporation's compliance activities.

The 2020 revisions to the now-famous guidance on the **"Evaluation of Corporate Compliance Programs"** emphasize the need for corporations to ensure not only that compliance programs are "applied earnestly and in good faith," but that such programs are both "adequately resourced" and "empowered" to function effectively. In 2021, the integrality of the compliance function to an organization's core operations was **reinforced** by Deputy Attorney General Lisa Monaco, who heralded several new DOJ initiatives, including (among other things) a restoration of prior DOJ policy requiring a complete disclosure of all non-privileged information by corporations implicated in wrongdoing as a prerequisite to qualifying for "cooperation credit."

As recently as October 2022, the DOJ **expanded** upon these requirements with the announcement of additional policy changes aimed at reinforcing the notion of individual accountability, encouraging voluntary organizational disclosures, and increasing the DOJ's reliance on independent corporate compliance monitors. Collectively, these initiatives represent a sea change in the way corporate compliance programs have historically been regarded and should serve as a strong impetus for organizations across economic sectors to reorient their thinking about the importance of the compliance function to contemporary corporations.

Beyond regulatory demand

External pressure is not the only factor driving the corporate arena's increasing commitment to ethical and compliant practices. As studies consistently demonstrate, the most ethical companies routinely outperform their counterparts in meaningful measures of corporate health, including but not limited to, a higher-than-average return on assets ("ROA") and mitigation of financial loss. According to **Ethisphere's 2022 Ethics Index**, for instance, the World's Most Ethical Companies outperformed a comparable sample of "large cap companies" by nearly 25 percentage points over a five-year period from 2017 to 2022.

Furthermore, as noted by a popular **Ponemon Institute study**, the average cost of non-compliance was found to be nearly 2.65 times the cost of compliance, proving the old adage that an ounce of prevention is indeed worth a pound of cure. Moreover, the most ethical companies are demonstrably more able to attract and retain top talent; As commitment by a new generation of skilled workers to corporate social responsibility grows in prominence, companies are now obliged to consider whether their compliance programs meet employee expectations as well.

According to a 2022 Deloitte report, an organization's commitment to environmental and social concerns in particular plays a crucial role in predicting employee longevity and attrition—with Gen Z and Millennials more likely to stay with an employer for more than five years if their values align closely with the organization's social contributions. As the "Great Resignation" becomes more ubiquitous, the onus has noticeably shifted from employee to employer, giving a more discerning generation of skilled workers considerable leverage in shaping corporate decision making at the highest levels. Viewed in this light, ethics and compliance concerns are now the key differentiators between competitive and less competitive companies.
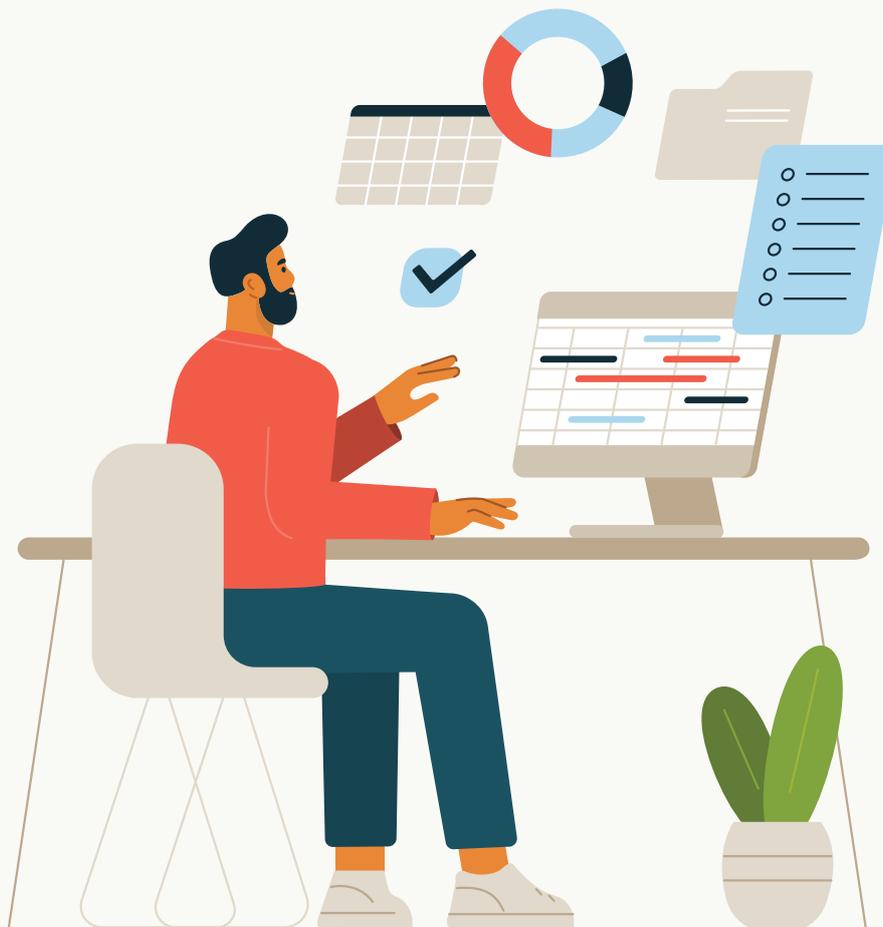
Connecting ethics to business value with The Integrity Platform

The process of operationalizing compliance—integrating compliance concerns into the very fabric of the organization's activities—is the marquee element of a robust, contemporary compliance program. Abandoning the antiquated notion that compliance is an obstacle to performance, the prevailing paradigm views compliance as integral to sustaining competitive advantage. In this vein, ethically-conscious and compliant behavior is synonymous with organizational success. That's the premise upon which the Integrity Platform is developed, helping compliance teams weave compliance and ethics in with business processes, at all levels of the corporate hierarchy—from the proverbial 'factory floor' to the C-Suite. To drive this transformation, the Integrity Platform is designed to impact five key levers to influence an organization's assessment of its current compliance program posture:

- Adoption
- Integration
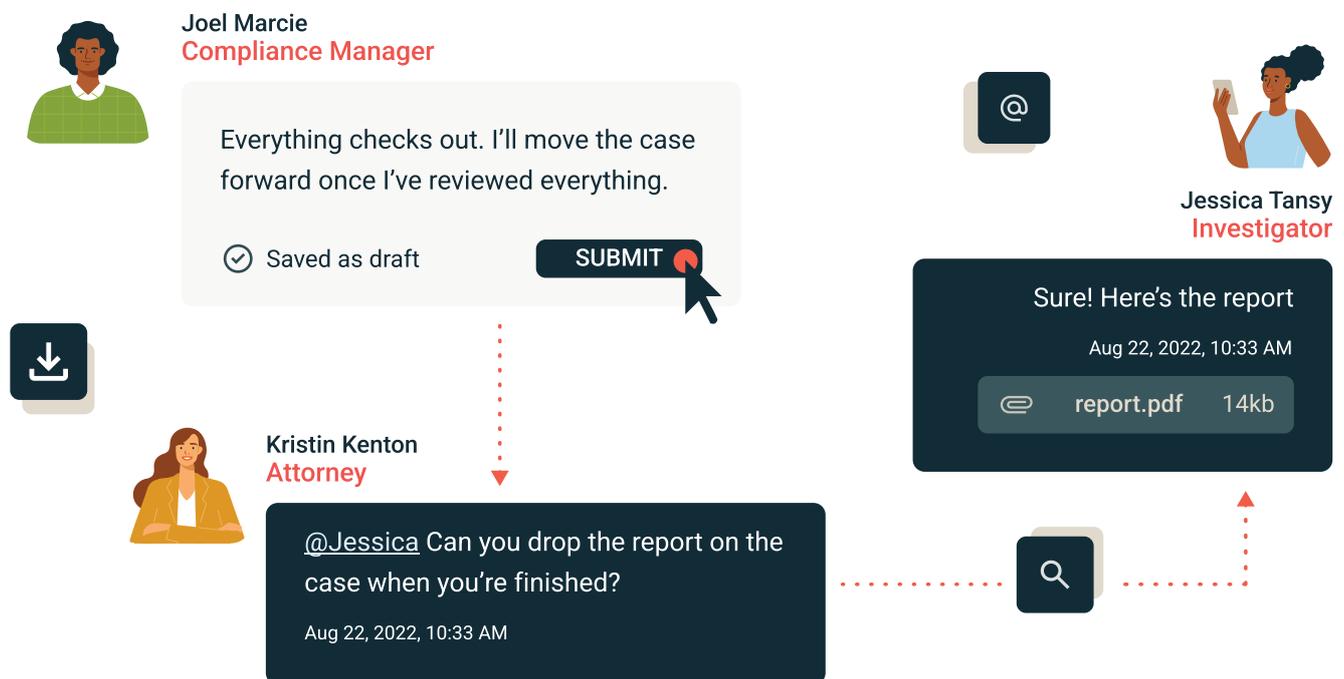- Engagement
- Insight
- Adaptability

Adoption

While organizations are often prone to adopt best industry practices to meet evolving regulator expectations, a compliance program that actually works in practice is preferable to one that exists on paper only, even if such a program is less refined than the standard alternative. This underscores the notion that a compliance program must be capable of widespread adoption to be effective.

Where adoption is concerned, ease of access and usability are paramount considerations. In other words, to be prone to adoption, compliance processes must be both accessible to an organization's rank-and-file and be susceptible to regular utilization. With the Integrity Platform, companies can automate and streamline compliance processes across all areas, from risk management, disclosures, incident management, third party risk management and more. The platform's intuitive interface guides employees through a simple and straightforward process to complete compliance-related tasks.

It goes without saying that even the most sophisticated compliance solutions are incapable of delivering results if they remain underutilized. The Integrity Platform can therefore be customized to create unique user journeys meeting the expectations and requirements of each individual user; from senior leadership to front line employees, allowing them to easily view, assess and input on matters that relate to their role and function.

To achieve adoption, it is necessary that employees know how, when, and where to interact with compliance and ethics programs; where program usability and accessibility falls short, the momentum is lost and employees will delay, avoid and circumvent the program altogether.

Joel Marcie
Compliance Manager

Everything checks out. I'll move the case forward once I've reviewed everything.

⊘ Saved as draft   **SUBMIT**

Jessica Tansy
Investigator

Sure! Here's the report

Aug 22, 2022, 10:33 AM

🔗 report.pdf   14kb

Kristin Kenton
Attorney

@Jessica Can you drop the report on the case when you're finished?

Aug 22, 2022, 10:33 AM

Integration

As mentioned previously, integration of compliance-conscious processes and procedures into the operational fabric of the organization is critical to mitigating the potential for ethical and legal infractions. A virtual prerequisite for integration, however, is complete compliance program transparency. Too often, an organization's various divisions operate as information silos, where critical compliance-relevant information remains shielded from broader public view. Such territorial practices completely undermine the compliance function's ability to make informed, data-driven decisions.

The Integrity Platform bridges this frequently seen gap between business process and teams through scalable integration enabling the organization to share information throughout the organization based on need and relevance. By storing compliance information in a centralized platform that is easily and dynamically accessible by members of the organization and which is further enriched by scalable data integrations, compliance teams are empowered with a holistic view of matters enabling true data-driven decision making and effective containment of risk. In the case of third-party risk management, for instance, information concerning a company's suppliers, vendors, distributors, service providers, intermediaries and other agents can be shared on the broadest possible basis with all relevant stakeholders. Where red flags are present or mitigation efforts are required, this information, too, is shared on a cross-functional basis to ensure that all relevant actors are properly acquainted with the company's third-party risks.

Integrations in and around the Integrity Platform also enable the consolidation of an organization's compliance risk profile into a holistic enterprise-wide risk assessment, empowering the organization to more effectively visualize—and consequently prioritize—the totality of its unique risk factors, thereby ensuring that scarce organizational resources are allocated on a more objective, data-driven basis.
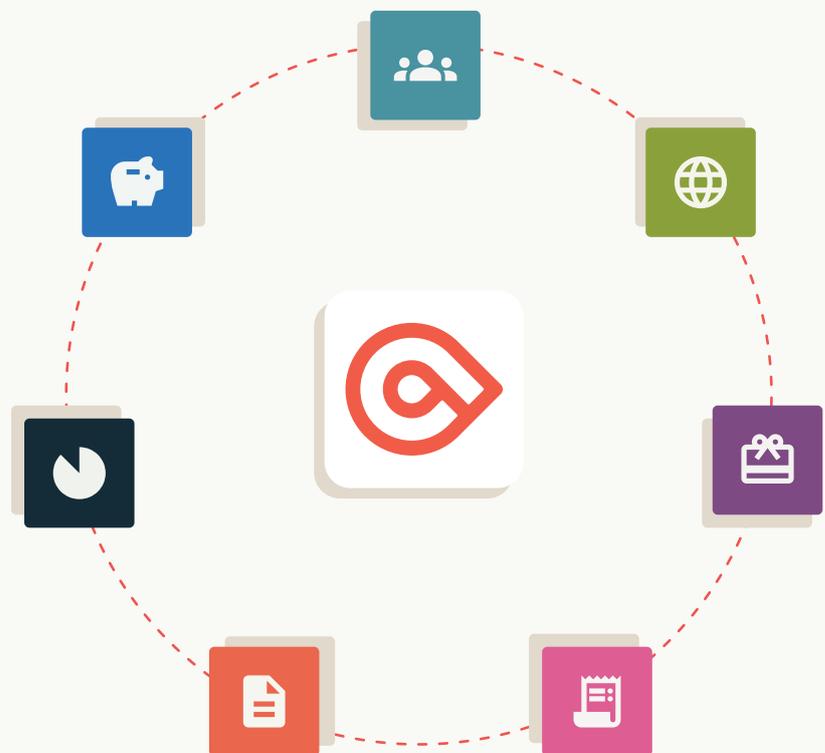
Engagement

Engagement is another critical element of an effective compliance program that focuses on the extent to which an organization's employees operationalize compliance concerns. To facilitate such engagement, the Integrity Platform is designed to maximize practical considerations and collaboration wherever possible. As previously mentioned, this includes integrating compliance controls into existing business processes in the least obtrusive manner possible, but also allowing the compliance function to easily engage critical stakeholders whenever their input is required.

Communication of compliance expectations cultivates a shared understanding of organizational values that serves as the foundation for building a broader culture of compliance. Solicitation of feedback is a recognition that compliance is a shared responsibility. For these reasons, the Integrity Platform is designed to engage stakeholders in the easiest and most efficient ways. By focusing on tailored user journeys and building bridges through platform integrations, users' input and feedback is solicited within the systems they use every day ensuring it is collected and completed, thus facilitating continuous collaboration across the business.
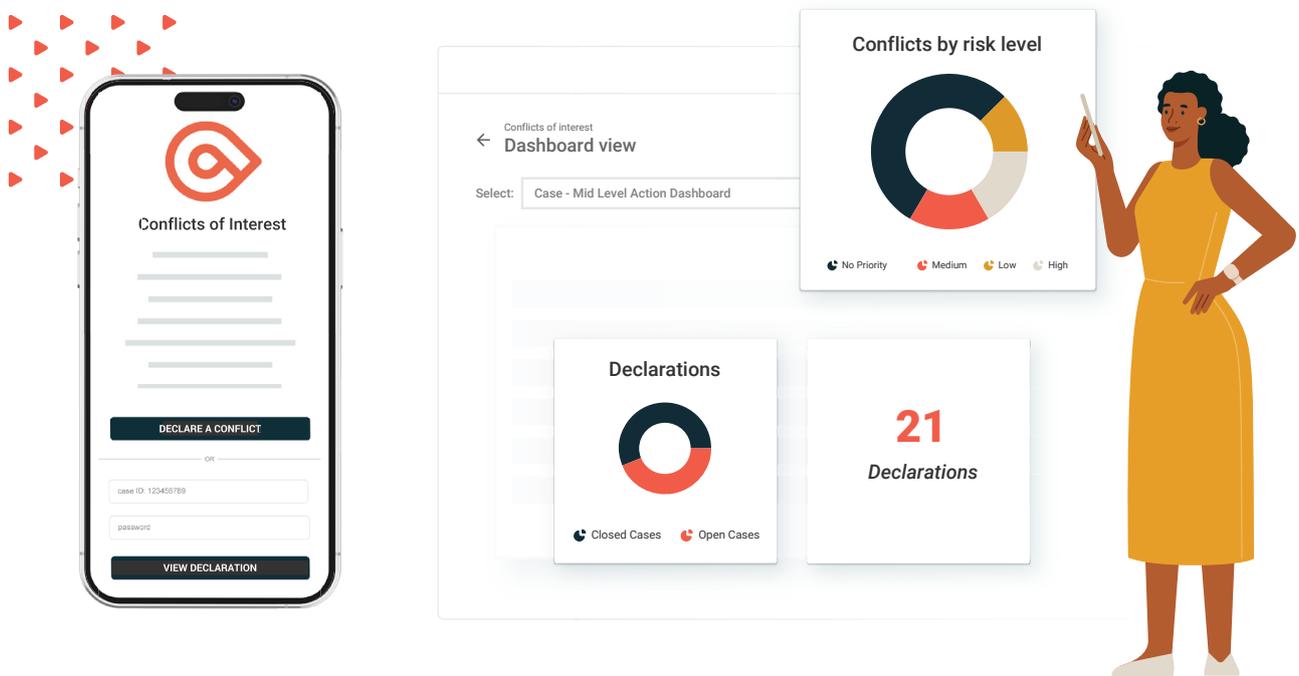
Insight

An effective compliance program is one ultimately driven by the power of data. A lack of meaningful insight into the major risk factors facing the organization is a recipe for the execution of a fragmented and incoherent compliance strategy—one that fails to meet regulator expectations and is ineffective in ultimately detecting (and potentially preventing) legal violations. Accordingly, the compliance function of the organization must be dedicated to data collection, aggregation and analysis whenever and wherever possible to inform decisions about enhancing potentially deficient internal controls or devoting additional resources to mitigating a particular risk.

This insight is enabled through the Integrity Platform's enhanced reporting and analytics experience where compliance data is continuously collected, curated and tailored to meet the needs of different user groups. It is made compre-hensive and accessible by integrating compliance data across every compliance process and connecting the dots to see risk in aggregate. With the Integrity Platform's reporting and analytics, the compliance function can manage its core operational responsibilities more efficiently and report on the status of its efforts more seamlessly. Crucially, the platform allows teams to harnesses the power of customized reporting to generate data and other actionable insights suitable for a management and board-level audience.

Adaptability

A core tenet of the Integrity Platform is adaptability. In this context, adaptability refers to the platform's malleability allowing compliance teams to design, expand and adjust their compliance program from the start — and over time — to meet unique business requirements and as additional concerns materialize and new regulatory requirements arise. A crucial characteristic of the Integrity Platform's architecture that allows compliance to adopt a true risk-based approach as the most effective compliance programs are tailored to an organization's existing processes and unique risk profile.

For instance, a compliance program designed for a domestic manufacturer of a single product with no public tender exposure is entirely different from a compliance program suitable for an international distributor with significant government contracts. Here, the flexibility of the Integrity Platform will accommodate the organization's operational practices to ensure that potential compliance concerns are identified and proper internal controls are devised.

Once operational, the program can be easily adjsuted when the need arises. An adaptable compliance program is one that evolves almost organically in response to new concerns. These programs articulate broad, values-driven principles that are reflected in all operational practices and are capable of being expanded in response to emerging regulatory requirements. For instance, an adaptable compliance program for an international corporation might feature broad anti-bribery and corruption principles that, rather than pertaining to a single jurisdiction, might have global applicability.

Recognizing the continuously evolving and changing regulatory and business environments, the Integrity Platform is designed to scale as the organization's compliance program matures. This ensures that an organization's investment is maximized be adapting the program to meet evolving circumstances and a changing risk profile.

Adoption, Engagement, Integrated, Insight and Adaptability; all critical levers to support businesses on their ethical business transformation and propel them towards value creation and better business performance. The key is in rethinking how ethics are operationalized within the organization, the impact it has on people, and its ability to affect change.

Enabling ethical business transformation

At GAN Integrity, we view ethical transformation as a journey enabled by a user-first approach to technology; one that ensures users adopt the program, engage with its purpose, harness the insights and affect change.

With the Integrity Platform, people are the focus; elevating their experiences to positively impact behavior, ensuring that ethical behavior does not end with the exit of the compliance platform, but propagates to instill ethical behavior in the minds and hearts. In turn, accelerating ethical transformation to generate tangible outcomes and long term value for the business.

Solutions created by our customers, for our customers

Increasing productivity for Clarios through automation

One of the world's leading manufacturing companies Clarios streamlined their speak up portal and created a simple and straightforward incident management process to ensure that every employee is heard and that every manager is guided through the investigation process.

" When we try to make it more complex...we lose sight of what it is we're really trying to do, which is to have a tool that can guide us through a case well, allow us to document it very well, and make it easy for multiple people to use. GAN Integrity does that"

– Deborah Spanic, Chief Ethics and Compliance Officer for Clarios

Driving insight for Infront Sports with a centralized platform

Ensuring that it's in line with the latest compliance regulations, Infron Sports connected all of its compliance processes on the Integrity Platform allowing the compliance team to drive insights across the full program.

" Working with GAN Integrity is] quite easy because everything is in one place and that was important for me to have one platform that can represent everything we need because then...[everyone] knows where to look"

– Barbara Lustenberg, Head Group Compliance, Infront Sports & Media AG

Adapting the program to meet Barrick Gold's evolving needs

Accommodating change and evolution in the company, Barrick Gold leverage the Integrity Platform's flexibility to scale its high risk transaction platform to become the company's Business Integrity Platform.

" GAN Integrity started out as only our high-risk transaction platform, then became our transaction, conflict and government interaction system. Now it's just our Business Integrity Platform"

– Jessie O'Neil, Business Integrity Global lead, Barrick Gold

Leading digital transformation at Red Hat

Leveraging the Integrity Platform's flexible workflows and scalable APIs, Red Hat bridged processes through digital transformation and turned third-party vetting into a truly partner-centric process.

" Everything we do to take a third party through a due diligence process is all captured in the same platform"

– Karen Hinchey, Program manager, Red Hat

GAN Integrity enables the world's largest brands to do the right thing.

We fulfill our mission by enabling global teams to manage ethics, compliance, and risk with our Integrity Platform, a no-code application building platform.

Seadrill   **DANONE** NORTH AMERICA   **CLARIOS**   **BARRICK**   **unfront**

Schedule a meeting to start driving ethical change

To contact us, visit **ganintegrity.com**

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