COSMOS
Navigate the Compliance Universe

The Accidental Compliance Professional
The Compliance Professional's Credo

This is a list of things I commit to as a compliance professional. It's not an exact science, an exhaustive list, or a standard—it's just my perspective. Use this credo as a starting point for your own compliance credo.

- I prevent, find, and fix ethical and regulatory problems and strengthen my organization's ethical culture using all elements of a compliance program.
- I am concerned about all risk areas and laws.
- I base my compliance program on Chapter 8 of the Federal Sentencing Guidelines.
- I regularly reread the Code of Professional Ethics for Compliance and Ethics Professionals to reset my focus.
- I am conflict-free, unbiased, and impartial.
- I seek support from my peers and I seek to support my peers
- Interpersonal skills such as collaboration, negotiation, and influence are keys to my success. I fully commit to having a strong emotional IQ.
- I help departments minimize the impact of compliance on business effectiveness.
- I help leadership effusively communicate their commitment to compliance and ethics.
- I regularly ask people throughout the company if they are aware of any problems. I don't just rely on the hotline. I make it easy for people to report issues.
- I regularly conduct compliance education sessions and then follow up with a few private interviews asking if employees are aware of any problems identified in the training.
- I protect those who report issues and facilitate trusted anonymous reporting.
- I use facts and the truth, and effect due process to protect those who are falsely accused.
- I will work with the organization's leadership to address known issues. I gather facts and tell leadership the truth. I'm not influenced by internal politics. I protect leadership from bad advisors and seek to keep all employees out of trouble. I report all material impediments to the implementation of an effective compliance program to leadership.
- I will report to a subcommittee of the board on a quarterly basis, the whole board annually, and regularly provide education to the board.
- I avoid finger-pointing and lecturing. I will recommend discipline when warranted.
- I consider risks created by partners, advisors, contractors, and third-party companies.

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- I work *with* in-house and outside counsel—I don't work *for* them.
- I am aware that conflicts of interest create problems and can be the enemy of resolving problems. I seek to remove or effectively manage conflicts of interest when possible.
- I believe I need a seat at the table to prevent problems before they start.
- I will not participate in misconduct. Integrity is my core principle and I will not compromise it, even to right a wrong.
- I wait until a comprehensive investigation is completed before discussing specific details or recommendations, but will keep leadership generally aware of my progress.
- I only discuss possible ethical and regulatory issues with those who need to be involved.
- I am willing to delegate any compliance activity, but will assure it gets done correctly.
- I help everyone in the company take on some responsibility for compliance.
- I use outside specialists, not generalists, for high-risk activities.
- I cannot be responsible for both operations and compliance for the same area.
- If I discover an unrelated problem during an investigation, I will investigate it thoroughly.
- I do not let the pain from fixing a problem deter me and I will resolve it internally.

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