

## CEP Magazine – January 2022 Implementing global disciplinary guidelines in a decentralized organization

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Dentsu International (dentsu) is a global company with 45,000 employees and offices in more than 90 markets. It has grown rapidly through acquisitions over the past ten years, with employees coming under the dentsu umbrella from different countries and corporate cultures, with a matrixed organizational structure. Due to this complexity, disciplinary outcomes sometimes differed across the business.

When the U.S. Department of Justice (DOJ) issued the updated *Evaluation of Corporate Compliance Programs* in June 2020,<sup>[1]</sup> which calls for consistency in application of disciplinary actions, it was the cue for dentsu to develop a set of guidelines that would be applied globally and consistently if an employee were to violate a law, corporate policy, or mandate.

In addition to the DOJ guidance, the company rebranded and introduced new ways of working: “the 8 ways to the never before.” The global disciplinary guidelines were seen as a tool to uphold these standards and ensure that there is a consistent and fair disciplinary response to individuals who have not followed the code of conduct and/or global policies and procedures, regardless of their job title or length of tenure with the company.

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