

The Complete Compliance and Ethics Manual 2024

Appendix 3-G: Considerations for Global Code Implementation and Rollout

No matter which approach an organization selects to distribute its code, there are a number of considerations to take into account. Below is a chart outlining key considerations for before and during code implementation and rollout.

Timing	Task	Function Responsible	Action Plan	Completion Date
Before code introduction	Work with corporate communications to develop a rollout plan to include messaging strategy and content, selection of the communication channels, methods, formats, languages, and timing that will be used.			
	Consultation with sustainability and/or environmental, social, and governance colleagues is recommended before deciding to create a printed paper code to ensure company commitments related to use of resources are taken into account.			
	Messaging strategy should ideally be values-based and designed to overcome possible perception that it is “just another message from corporate” and ensure employee engagement.			
	Messaging content should emphasize that all employees—including senior management and the board of directors—share responsibility for ethical behavior and adherence to the code.			
	Develop a tool kit or resource site for managers of people to ensure they are aware of, prepared for, and know how to speak to their employees about the code rollout. Consider a separate communication campaign for managers in advance of general code rollout to ensure managers are properly prepared to support.			

	<p>Review the rollout plan with an international advisory group or members of international management to avoid cultural faux pas that could undermine the initiative. Identify any messages, images, approaches, or language issues that might not be well received in certain cultures or countries.</p>			
	<p>Determine whether you will require acknowledgement of receipt or formal attestation forms indicating each employee has read the code of conduct and will abide by it, and if so, whether you will require this of all employees or only those in certain levels of the organization. Also consider how often you will require this (e.g., only upon initial hire, annually, etc.).</p> <p>Note: Requiring attestation may not be well perceived in some countries, and may be viewed as an overly legalistic approach. In many European countries, you will need to negotiate and obtain approval for any such attestations from employee unions and/or works councils, and in certain countries, this may also require a formal amendment of employment contracts. It is important to consult local human resources and legal representatives for more information on whether such a practice can be implemented.</p>			
	<p>Determine whether the code will be distributed to external stakeholders. Many multinational companies require their higher-risk third parties to adopt their code or create a separate supplier code of conduct to which they must adhere.</p>			
	<p>Determine how code will be distributed to line workers who may not have system access, those working remotely, and those who are disabled and may not be able to access the code through standard written form. Consider customized messaging and formats for these or other distinct demographics within your organization. Consultation with your organization's diversity and inclusion experts is recommended to ensure equal access to the code for all employees.</p>			
	<p>Determine the metrics you will use to evaluate how effective your code rollout was (e.g., will you test employees on code content or will you follow up after the rollout with randomly selected employees to see if they received the code?).</p>			
During code rollout	<p>Ensure all employees, regardless of location or level, have access to the code and receive rollout messaging. Pay special attention to ensuring remote employees, disabled employees, and those working on a manufacturing line are receiving rollout messaging.</p>			

	Encourage employees to read the code document as soon as possible and to ask questions. Ensure they know how to and to whom they may direct questions about the code.			
	Consider incentivizing employees to read the code (e.g., provide small rewards to first employees to answer questions about the code correctly).			
	Provide education and/or Q&A sessions about the code for all employees. Describe the relevance of the code in relation to other compliance resources available to employees. Familiarize employees with the layout and structure of code. Ensure they know how to find specific information in the document.			
	Ensure managers are equipped to answer questions about the code as they arise. Provide managers with support in answering questions they do not know the answers to.			
After code rollout	Conduct a review of your code rollout. How did it go? What mistakes can you learn from to ensure your next compliance communications campaign is even better?			
	How effective was your code rollout? Did you reach the people you needed to reach? Report the effectiveness metrics you chose to your compliance committee and/or senior management.			

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