

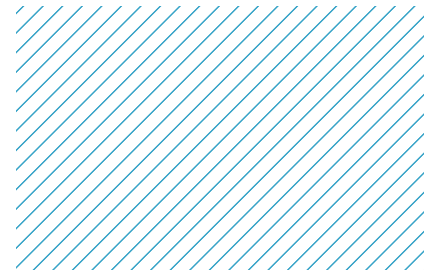


ELI LILLY'S TAKE ON HIGH PERFORMANCE WITH HIGH INTEGRITY

Compliance is everyone's responsibility

Written by Gunjan Singh, Director, Ethics and compliance, Eli Lilly & Company India

Today, most multinationals have been able to successfully create a compliance framework within their organization. These robust compliance frameworks generally encompass a dedicated team of compliance professionals, well-written policies and procedures, and well-executed compliance programs comprised of regular communication and training.



No matter where we are in our programs, we end up asking ourselves:

- Why are these programs still highly dependent on rigorous monitoring and audits?
- Why do organizations still develop mission statements around integrity and require employees to uphold them?

There could be multiple answers to these questions. As humans, we are vulnerable to rationalizing actions for the good of the organization that might not be best in the long term. Our definition of integrity might also vary based on cultural differences and our social environment. Above all, we might believe that it's the compliance team's responsibility to drive integrity in the organisation.

Compliance is everyone's responsibility. Unless all employees truly believe in this statement, we, as compliance leaders or auditors, would need to continuously test and be responsible for our findings.

The need of the hour is to drive the culture of accountability, of delivering business numbers with high integrity—ultimately winning with integrity, not without it. In order to integrate integrity into business practices, we need to equip future leaders with tools that enable them to develop the much-needed acumen of perceiving risks. Therefore, it is highly important that all employees are trained on managing ethical dilemmas.

At Eli Lilly & Company India (Lilly India), our first target to drive accountability for "high performance with high integrity" was the functional leadership. Starting last year, these directors began conducting their functional risk assessment exercise, which helped them look deeper within their respective functions and identify compliance risks in their teams. What better way to drive accountability than encouraging them to create their own functional mitigation plans for the identified risks and follow the plan throughout the year?

We changed the way we communicated about compliance topics to employees. For example, quarterly compliance webinars, which used to focus on procedural requirements, were changed

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to a panel discussion format with functional leaders talking about risks, tips to reduce them, and closing the loop by referring to procedures. Putting functional directors at the forefront of all ethics and compliance training and communication not only gives them a sense of empowerment on the subject, but it also helps set the tone. Someone once told me, "Tone is not just the message but also the frequency." So, we ensured that messages on integrity were not just heard from podiums during national or regional meetings, but that leaders shared the same messages with the organization using all possible platforms, on a monthly—and sometimes weekly—basis.

To drive further adoption, it is important to expand the program to include middle management, and we actively engaged integrity champions from various departments. The Ethics and Compliance team, meanwhile, continued conducting regular risk assessments, root cause analysis, and corrective and preventive action plan creation workshops to drive leadership exposure and commitment to compliance requirements.

When middle-level supervisors feel accountable and take necessary precautions, we can successfully drive home the concept of integrity. By including middle-level managers in compliance champion programs, these programs became more visible within the organization. These supervisors were regularly trained to identify risks in their daily activities through case-based workshops facilitated by Ethics and Compliance. They gained an additional understanding of ethics and compliance principles and were also accountable to roll out learnings to their teams on a monthly basis. There is ample proof that peer learning is the most effective adult learning technique. So, on a quarterly basis, we gave all supervisors a platform to share learnings. They shared real-life situations where they faced ethical dilemmas, the challenges in managing them, and resources that helped them make the right decisions. They also shared their assessment of risks in their

business and received cross-functional help on planning mitigation.

None of the above would be effective if we did not encourage and inculcate a culture of trust and transparency. All leaders routinely encourage employees to speak up with questions and concerns with no fear of retaliation. All channels to speak up are regularly shared with the organization through multiple platforms. Zero tolerance for any acts of retaliation is the consistent message across platforms for all business interactions.

This formula will not make all deliverables green in every audit scorecard, but I strongly believe this path can lead to a cultural shift. "Compliance is everyone's responsibility" is not just a fancy tagline, but rather it's what organizations and employees need to continually work towards. When employees learn to navigate ethical dilemmas via the path of integrity, the moral foundations of the organization become stronger and can better support the business objectives and strategy for the future

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Ethics and Compliance Program

At Lilly, we are committed to upholding the highest standards of corporate conduct in all business dealings around the world. Our global ethics and compliance program supports this commitment and is designed to meet all external requirements including codes issued by the International Federation of Pharmaceutical Manufacturers & Associations, the Pharmaceutical Research and Manufacturers of America, and European Federation of Pharmaceutical Industry Associations.

The Lilly family's core values of integrity, excellence and respect for people provide the foundation for this program and continue to guide all that we do today.

The fundamental elements of our ethics and compliance program include the following:

- Oversight
- Written Standards
- Education and Training
- Communication
- Auditing and Monitoring
- Response to Potential Violations

Source: Eli Lilly

Author Biography

 **Gunjan Singh** is the Director of Ethics and Compliance at Eli Lilly & Company India. As the Head of the Compliance function, she is responsible for driving the culture of integrity and transparency and is a part of the Lilly India Leadership team. Gunjan joined Lilly in 2011 and since then has had the opportunity to work in a variety of roles. Prior to her current role, she was the medical lead for multiple products under Lilly India's portfolio. She was actively involved in developing scientific knowledge of sales teams in her previous roles. She leads the medical information services for India and six other countries in Asia, the Middle East and Africa.