

# Foreword

As a further component of the compendium "Compliance as a leadership task", the DICO working group "Compliance as a leadership task" has developed a questionnaire. The questionnaire was presented on the occasion of the DICO Forum 2019. In the context of a workshop with the title. "Do you still do compliance "alone" or is it already a leadership task in your organization?" The questions were discussed together. Ultimately, these questions should shed light on the fundamental question of whether compliance is practiced as a leadership task in the organization and what the reasons are if this is not the case.

» **To this end, the questions address the following five complexes:**

1. Compliance as part of the leadership task?
2. What stands in the way of the goal "Compliance is a (self-) leadership task"?
3. How to achieve a cultural change among leaders?
4. Do leaders see themselves well supported and in a position to perceive compliance as a (self-) leadership task?

The working group would like the questionnaire to be understood as a modular system. Members can obtain a Word version of the text from the DICO office so that they can easily adapt it to their needs. The working group also recommends including comment fields in the questionnaire so that managers can make suggestions in free text. This gives them the opportunity to address the content of the questionnaire and is a good starting point for direct discussions with the executives. There is also the opportunity for incidents to be communicated through this. This is an opportunity for the companies to follow up on them, but it also means that they have to do so.

Organizations that use this questionnaire in the same way or in a modified form are aware that "if you ask questions, you have to expect answers". Therefore, before starting such a survey, it should be clear what it is intended to achieve or effect. It is possible that simply asking these questions will be a paradigm shift in some organization. The means should be available or the willingness should exist to make them available in order to remedy any grievances that may become apparent. Against this background alone, it will make sense to discuss the questionnaire in advance with the management. It should be made clear that new/different communication on compliance may be necessary in response to the survey, or that new tools such as e-learning may be needed.

If the survey is repeated with at least some of the same questions every one to two years, changes will become visible, which in turn can be very helpful in analyzing what still needs to be done in the organization.

It is also conceivable to use the questionnaire to enter into a dialog with (selected) managers on compliance. For example, by asking them what they would think if they were asked to answer the questionnaire. In this way, they are involved in the process at an early stage and are more likely to be won over to the change that may be needed in the organization. In this way, the questionnaire can be used as a "run-up" intervention to enter into an integrated change process together with the managers. The goal of the change process could be the strategic goal of making compliance a natural part of the company DNA.

At the end of the questionnaire, under the heading "General", there are examples of company-specific questions that ask about specific "compliance knowledge". How can a manager be a role model for compliance if he or she is not well versed in these issues? In addition, if you are already starting a survey, it is helpful to gain knowledge about whether the company's rules are well enough known.

We wish you valuable insights by means of the questionnaire!

The members of the DICO working group "Compliance as a leadership task".

# Questionnaire „Compliance as a leadership task“

## 1 Part: Compliance as part of the leadership role?

» I am of the opinion that compliance plays a vital role in our business.

„do not agree“       „sometimes“       „completely agree“

» In commercial decisions I am prepared to flexibly interpret Compliance rules if this is in the interest of the company.

„do not agree“       „sometimes“       „completely agree“

» My leadership tasks include: (multiple choices possible):

- People management
- Reporting (also of Compliance violations)
- Team-Management
- Development Strategy
- Creation/Maintaining of a company culture, in which Compliance is a common part
- Budget control
- The conveying of a corporate culture, in which it is clear that correct behavior is expected, is an important part of my leadership task.
- If in doubt, our compliance officer or the (legal entity) management is responsible for Compliance.
- I advocate Compliance also outside my direct sphere of responsibility, because the topic is important for the whole company.

## 2 Part: How, when, by what does Compliance become a leadership task?

» My employees are trained by me or by their direct managers in compliance topics.

„do not agree“       „sometimes“       „completely agree“

» My employees are regularly trained by the compliance department or by other departments in compliance topics.

„do not agree“       „sometimes“       „completely agree“

» I see that in our company compliance is lived and promoted „from the top“.

„do not agree“       „sometimes“       „completely agree“

» I understand the content of our compliance documents (Code of Conduct, policies...) and believe they have a practical relevance form my area of work.

„do not agree“

„sometimes“

„completely agree“

» Compliance has become part of my leadership task by: (multiple choices possible)

Taking over of my current role,

Direction of my boss,

a company policy,

Assignment b the Compliance Officer,

no answer applies.

In our company Compliance is natural part of our DNA.

In potentially critical topics, I can trustfully reach out to my superiors and the Compliance-Organization and this will not have negative consequences for me or will create a lot of work for me.

### 3. Part: What are obstacles to the goal „Compliance is a (self-) leadership task?

» In my daily work there are regularly constellations, in which compliance with internal or legal guidelines rather prevent business.

„do not agree“

„sometimes“

„completely agree“

» I sense that compliance topics are systematically, consistently and regularly communicated and that no communication by me is needed.

„do not agree“

„sometimes“

„completely agree“

» I can explain to my employees what compliance means in and for our company.

„do not agree“

„sometimes“

„completely agree“

» In our company a culture of „straight backs“ is promoted and demanded.

„do not agree“

„sometimes“

„completely agree“

» I had or still have a conflict between my targets and the compliance with compliance rules.

„do not agree“

„sometimes“

„completely agree“

» Compliance is a value added for the success of my team / my department and therefore also for me as a people leader.

„do not agree“

„sometimes“

„completely agree“

- » Before I go to the relevant department with a compliance question, I try to come to a solution myself (multiple answers possible)
  - a) because the relevant department does not help me.
  - b) because I feel confident in compliance topics.
  - d) because I want to know if I made the same decision as the contact person in Compliance
  - c) No, I cannot answer those questions myself.

#### 4. Part: How does cultural change succeed among people leaders?

- » I sense a cultural change in the company, towards a more intensive sensibilization of the employees for compliance topics.

„do not agree“                       „sometimes“                       „completely agree“

- » Compliance is understood as value added and as a Business-Enabler.

„do not agree“                       „sometimes“                       „completely agree“

- » I see Compliance as a leadership task, because (multiple choices possible)

- the management / my boss request so
- I can only get my bonus that way
- because we work in a culture of trust,
- everybody of us in the company is responsible for Compliance,
- I don't want to go to jail,
- our reputation ist he basis for our business..

#### 5. Part: Do people leaders feel well supported and in the position to exercise compliance as a (self) leadership task?

- » The Compliance funktion supports me as a people manager well to understand my rights, my duties and my possibilities.

„do not agree“                       „sometimes“                       „completely agree“

- » What is missing in order for me to take over / improve compliance as a leadership task? (multiple choices possible)

- Cultural change in the company.
- Training by the Compliance-Officer
- Support of the management / my boss
- Culture of trust
- More time
- An open culture of mistakes.
- Unequivocal Tone from/at the Top with respect to Compliance with the meaning that Compliance should be a natural part of the company DNA.
- Nothing

## 6. General questions

- » Are you fully aware of the situations in which you need to obtain an approval with respect to gifts and donations?

„do not agree“

„sometimes“

„completely agree“

- » Do you know the reporting lines for allegations of irregularities?

„do not agree“

„sometimes“

„completely agree“

- » Do you have a conflict between the achievement of your personal goals and the compliance rules?  
(In this case you should speak with your manager or your compliance officer.)

- » Have you participated in the E-Learning regarding the code of conduct and have you encouraged your team members to do so as well?

„do not agree“

„sometimes“

„completely agree“

- » When did you last discuss with your team about desired behavior in Compliance relevant situations?

within the last 12 months

more than 12 months

I do this regularly at least twice a year.

not yet

- » Are you happy with the tools and materials provided by the compliance department? If not, what do you propose or what is missing?