

Compliance & Ethics Professional

May
2016



A PUBLICATION OF THE SOCIETY OF CORPORATE COMPLIANCE AND ETHICS

www.corporatecompliance.org

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by Steven Priest

Key learnings from a distinguished E&C career

An interview with **Maryann Clifford** (mclifford18@gmail.com), previously Chief Ethics and Compliance Officer at BP and Motorola.

Steve Priest: Maryann, you have served as Chief Legal Officer for Motorola’s mobile phone business, then Ethics and Compliance Officer for Motorola Inc., and most recently as BP’s Chief Ethics and Compliance Officer. What are your main learnings from these clearly non-stressful positions?



Priest

Maryann Clifford: I feel fortunate to have had the opportunity to take on these positions at what were critical times for these companies. Looking back, I have three key learnings. First, engage with business leaders early and often to better understand their needs and view of the Ethics and Compliance (E&C) function. In many instances, our leaders/managers did not really understand the role of ethics and compliance beyond regulatory compliance. Educating the business by doing things for them, like drafting communications or providing real case studies, helped get them comfortable with embedding ethics into their day-to-day business activities.

Steve: This helpful, embedding approach is so important. Many compliance officers complain about being viewed as police. Providing tools that are helpful to the business counteracts this stereotype.

Maryann: Yes, but don’t try to do it all at once. Shifting a culture to one where ethics and compliance are integrated into the business takes time. Pick your priorities and let them embed before throwing more at the business. If you don’t have an appropriate Code of

Conduct and basic policies and procedures around conflicts of interest (e.g., gifts and entertainment, etc.), put those in place before pushing the business on how well they are complying. You can’t start monitoring how strong the E&C program is in a business until you have a program and clear guidance for them to follow.

Steve: Even in monitoring, your approach is more of a partnership, “How can we work together to improve things?” more than “Do things this way or we will get you.”

Maryann: Of course, and this is related to my third learning—Develop really strong relationships with your sister functions. I have had experiences where individuals on my team would project an attitude that only the E&C or Legal function knows best in the compliance area. This led to a lack of trust and an inability to accomplish many of the team’s objectives. Use your Corporate Communications team to help drive your message and let them know how important the partnering is. Engage HR in embedding E&C priorities in the discipline process and performance reviews. Make it their accomplishment and you will see greater results.

Steve: It is a hallmark of great E&C programs when others take credit for E&C accomplishments. Thank you, Maryann, for highlighting this embedded approach throughout your E&C career. *

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