Compliance & Ethics Professional

A PUBLICATION OF THE SOCIETY OF CORPORATE COMPLIANCE AND ETHICS

www.corporatecompliance.org



19

Tips for creating and maintaining a compliance program

MaryEllen O'Neill

29

Conducting compliance training in international locations

Anne Marie Logarta

35

Understanding Binding Corporate Rules

Jan Dhont, Alyssa Cervantes, and Delphine Charlot

39

U.S./Cuba trade relations update: Is it all just political (cigar) smoke?

Jeremy Mauritson

by Steven Priest

Do compliance and corporate responsibility belong together?

An interview with **Chris Fox** (Christopher.Fox@Hanes.com), Vice President, Corporate Social Responsibility, Hanesbrands, Inc.

> **Steve Priest:** Chris, 15 years ago I predicted that ethics, compliance, and corporate responsibility would converge, since they were all about doing the right thing. Then came the scandals of 2001, Sarbanes-Oxley, more scandals, and now it seems ethics and compliance



Priest

(E&C) is separate from corporate responsibility almost everywhere. But you lead all three at Hanesbrands. Why did you bring them together?

Chris Fox: We've brought them together and kept them together for years because they are all so much a part of our core DNA. We agree with you and believe they have converged.

To us, the only way to successfully manage a global business in this complex and highlyregulated world is to constantly push our nearly 60,000 employees to do the right thing every day in everything they do.

Steve: In many companies, I see the "Do the right thing" message pushed aside by overwhelming "Comply with all policies and regulations" messages. How has an integrated approach worked out for Hanesbrands?

Chris: We believe it has worked out extremely well. We have fully integrated our ethics program into such core compliance efforts as our global anti-bribery and factory certification programs, and our guiding philosophy of pushing our employees to do the right thing every day even helps to drive how we engage our local communities and employee volunteer efforts.

Steve: I love this. I don't think employees have separate mental compartments for ethics, compliance, and corporate responsibility. They are all about doing the right thing. However in a recent discussion with a compliance officer at a very big company, he opined that the skill sets or aptitudes for people running a compliance program are very different from those running corporate responsibility. What have you found?

Chris: The skill sets may arguably be different on some levels. However, to be an effective leader in this space and to create a culture built solidly on both ethical and lawful conduct, that leader needs multiple skillsets part lawyer, part salesman, part coach, and part psychologist, just to name a few.

Steve: For companies considering integrating these roles, what are the main tips you have for them?

Chris: Get buy-in and support from the very top. We clearly have that. With such support, the function can be organized properly. Without it, efforts will always remain splintered and likely ineffective.

Steve: Thanks Chris. Like most things worth doing, integrating ethics, compliance, and corporate responsibility takes leadership commitment and execution. I am appreciative of the leading edge work Hanesbrands has done in this field. *

Steve Priest (Steve@IntegrityII.com) is President of Integrity Insight International. www.Integrityll.com