



Compliance Event Toolkit



[TRACE International](#) has developed a guide on how to host a company-wide internal compliance event. In this document, compliance professionals will find the means to develop a week of activities promoting the importance of compliance and ethics at their organizations.

How to Create an Internal Compliance Event Plan

Select dates and activities

- > Choose dates that will work worldwide, avoiding financial year end, local holidays, and high vacation seasons. Consider choosing dates that coincide with the annual [SCCE Corporate Compliance & Ethics Week](#) or [UN International Anti-Corruption Day](#).
- > Identify a theme or message for the week that relates to your company's values.
- > Select one activity for each day:
 - ◇ Day 1 – Launch Day: inform employees of goals and the schedule of activities.
 - ◇ Days 2, 3 and 4 – Contest, Game, and Resource and Review Days: host different types of activities designed to engage and educate.
 - ◇ Day 5 – Celebration Day: summarize the week's achievements, recognize winners, and reinforce your message.
- > Assign responsibility for coordinating and rolling out each day's activities to staff members and recruit volunteers from across the company to help.

Promote

- > Create a [mascot](#) or logo; ask employees to choose the winner from a list of finalists. If you held a mascot or logo competition last year, you can use the winning entry.
- > Add a press release to the company website.
- > Design a screen saver, special header for company's intranet or poster.
- > Utilize [SCCE's Compliance and Ethics Week Resources](#) to promote your week's activities.

Put into action

- > Involve all levels of leadership at the company. Convey that compliance is a top priority by having senior executives participate.
- > Prepare "in advance" items for each day.
- > Send any materials to offsite locations to ensure all offices are able to participate.

Day 1 – “Launch Day”

In Advance:

- > Videotape messages from the CEO and the Chief Compliance Officer encouraging participation and directing people where to address questions.
- > Select and order small gifts with a compliance message attached (most companies use small edible treats, like cookies or chocolates).
- > Draft an agenda or schedule that lays out the activities for the week.

On Day 1:

- > Display your promotional materials, such as logos, screensavers, and posters.
- > Distribute the video messages and agenda via email and post them to the company’s intranet. Post hard copies of the agenda in common spaces.
- > Hand out launch gifts or set up an event booth or headquarters where employees can come pick up gifts and information throughout the week.

Day 2 – “Contest Day”

In Advance:

- > Decide on a contest that everyone can join (see suggestions below).
- > Obtain materials and prizes needed for the selected contest.
- > Draft clear instructions, including where and when any entries should be submitted.
- > Design a leaderboard or identify other means of updating employees throughout the day.
- > Have the CEO and/or others in leadership roles create an entry – these can be humorous!

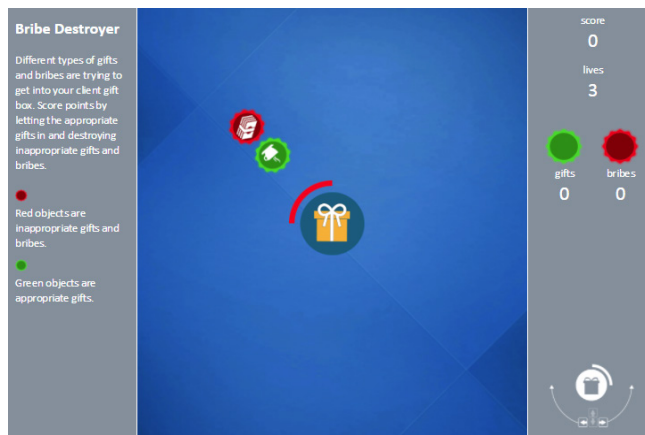
On Day 2:

- > Announce the contest has begun and distribute the CEO’s entry, accompanied by contest rules and instructions.
- > Provide a midday update of leaderboard results or share selected entries to maintain interest.
- > Select random entries for a “participation prize.”

Contest Suggestions:

- > **Selfie contest.** Employees take a picture of themselves holding a drawing or words explaining what integrity means to them. Corporate culture is really the sum total of each individual’s commitment, so let employees speak about their commitment.
- > **Slogan contest.** Contestants write on a poster board how they think the company best exudes compliance in 1-2 sentences or phrases. The winning phrase can be turned into a professional design that can be incorporated into company presentations and documents and a poster to be hung in conference and common rooms.
- > **Compliance Crossword Puzzle.** Employees complete a crossword and those with the most correct answers win a small prize. (You can find an example on the next page, or create your own [online!](#))

- > **Comic strip.** Provide employees with a blank comic strip template and ask them to create a comic incorporating a company value or a principle in the code of conduct. Suggest a few compliance jokes or puns to inspire them (“Brace yourself...compliance is coming” might work for Game of Thrones fans).
- > **TRACE’s Bribe Destroyer game.** Employees play TRACE’s online compliance game. Top scores win a prize!



Compliance Crossword!
See if you have serious FCPA knowledge

Across

- 1 Organization that enforces FCPA crimes (abbrev.)
- 3 President when FCPA became law
- 6 Maximum number of years in jail per FCPA anti-bribery violation
- 7 The “C” in FCPA

Down

- 1 Offered by the DOJ or SEC in exchange for cooperation (abbrev.)
- 2 Similar legislation to FCPA from 2010: UK _____ Act
- 4 FCPA term “anything of _____” when describing a bribe
- 5 Shares FCPA enforcement authority with DOJ (abbrev.)

Crossword Answers:

- 1 Across: DOJ
- 3 Across: CARTER
- 6 Across: FIVE
- 7 Across: CORRUPT
- 1 Down: DPA
- 2 Down: BRIBERY
- 4 Down: VALUE
- 5 Down: SEC

Day 3 – “Game Day”

In Advance:

- > Decide on a game that everyone can join (see suggestions below).
- > Obtain materials and prizes needed for the selected game.
- > Reserve a room large enough for the number of people who will be participating in the game, whether it be a conference room or an auditorium.

Game Suggestions:

- > **Red Flag Photo Hunt** developed by the SCCE. Using an empty desk, plant “red flags” out in the open for employees to identify—such as a gift from a vendor, or confidential prototypes. Employees either inspect the desk in person and snap photos of each red flag, or are given a photo of the desk to mark all red flags.
- > **Golden Ticket** developed by the SCCE. Print out golden tickets conveying a fake confidential document left unattended in the office. Inform employees that the tickets are waiting to be found around the workplace.

On Day 3:

- > Send out a reminder to all employees including game details and instructions.
- > Take photos of as many teams/employees participating in the game as possible to share on Day 5 – Celebration Day.
- > Designate staff or volunteers to be on hand to referee/assist with participation throughout game day.

- > **Build Your Own Story.** Distribute a number of anti-bribery scenarios and have employees work through those scenarios individually or in groups. Based on their decisions, see whether they can resolve each compliance issue—different decisions lead to different outcomes/endings for the story.
- > **Crack the Code.** Create sentences describing several important policies or principles from your code of conduct. Split each sentence in two, ensuring both halves can only match up with each other. Distribute the pieces of all sentences to employees and ask them to mingle, reading to each other their side of a sentence until they each find their matching half. Display the code of conduct principles on the wall and have the partners try to match their descriptive sentence to the correct one.

Day 4 – “Resource and Review Day”

In Advance:

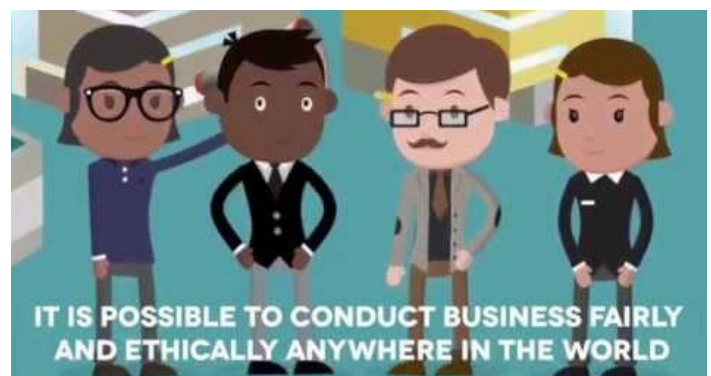
- > Identify resources to be distributed to employees and/or videos for a group viewing followed by discussion and Q&A from the suggestions below.
- > Reserve a room and a projector.
- > Make sure that video links can be viewed from computers and are not blocked by security settings.
- > Designate staff to be on hand for A/V support and to lead a group discussion.
- > Prepare questions for group discussion (if needed).

On Day 4:

- > Distribute selected resources or information on where employees can attend the group discussion.
- > Remind participants in contests that they must turn in their submissions by the end of the day for judging.

Resource/Discussion Suggestions:

- > **TRACE’s [How to Say No](#) series.** Practical tips and strategies to deflect requests for bribes or potentially inappropriate hospitality.
- > **TRACE’s [Bribe Busters](#) series.** This animated video series (three 5 min. episodes) for children was created by TRACE and follows four friends who defend fairness and right injustices around the world. Bribe Buster comic books may be handed out as a takeaway.
- > Employees can also receive a [list of slang terms](#) for bribery throughout the world and try to guess where the slang terms originated.



Day 5 – “Celebration Day”

In Advance:

- > Record a video of CCO thanking employees for their participation.
- > Purchase prizes and awards for contest and game winners, such as gift certificates to local eateries or cafes or a trophy or plaque featuring your company’s compliance mascot.
- > Collect contest entries and select winners.
- > Draft an announcement of winners of contests; also share some of the entries of leadership to convey the “tone from the top” message.
- > Design a [certificate](#) for those who participated showing that they are “Compliance Winners” for the year. Consider having employees nominate a “Compliance Champion” from the week.
- > Draft an email with additional resources:
 - ◇ Links to your code of conduct, helpline, and/or other important anti-corruption policies for your employees to review at their convenience. If your company has a whistleblower policy/hotline, that information should be included as well.
 - ◇ Photos and entries from the week’s activities. These can also be added to the company’s social media platforms.
 - ◇ TRACE’s [Bribe, Swindle, or Steal](#) podcast.

On Day 5:

- > Distribute the email with video from the CCO, photos from the week’s activities, and key takeaways from the event, thanking employees for their participation, and reinforcing the importance of compliance.
- > Distribute participation certificates.
- > Announce contest winners and distribute prizes.

About TRACE

TRACE International, Inc. is a globally recognized anti-bribery business organization and leading provider of third party risk management solutions. Members and clients include hundreds of multinational companies headquartered in the U.S. and worldwide. For more information, visit www.TRACEinternational.org.

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