

## ***Unofficial Messages-Creating a Culture of Compliance***

An article in the January/February issue of the SCCE magazine, entitled “*An ethical corporate culture goes beyond the code*”, author Dawn Lomer argues that the unofficial message which a company sends to its employees “is just as powerful-if not more powerful-than any messages carried in the code of conduct.” Lomer goes on to set out five different “unofficial channels” by which your company can convey and communicate its message regarding doing business in an ethical manner and “influence employee behavior across the board.

### ***Reward for Integrity***

Many compensation systems are based upon rewards for top sales. Lomer believes that such systems can lead to “hubris” which she believes is one of the main sources for unethical behavior in the workplace. Such hubris allows a high-producer to believe that the rules of ethical behavior do not apply to them. Lomer writes that the key is to reward employees for doing business in an ethical manner and that such an action “sends a powerful message without saying a word.”

### ***The three-second ethics rule***

It is important that senior management not only consistently drives home the message of doing business ethically but should communicate that message in a short, clear values statement. Lomer cites to Chris Bauer for the proposition that “If you have to think about it for more than three seconds to really know what it means, it fails the test.” However, if the message does meet the three second test, it can drive down to become a part of the company’s DNA.

### ***Environmental cues***

Environmental cues can cause employees to think, and work, in an unconscious manner ethically. Here Lomer discusses the concept that “the non-conscious part of the brain has a much bigger influence on day-to-day decisions than most people think.” This can allow a company to put cues up that emphasize doing business in an ethical manner. Simply the idea that a company is providing oversight on doing business ethically can be enough to modify employee behavior.

### ***Control the images***

A visual image is still a powerful tool for management. Just as pictures of competitive sports, combat or dollar signs suggest that winning is important, pictures suggesting cleanliness can lead to more ethical behavior. Lomer writes that a picture of a hand sanitizer at the office can provide employees “a better mindset about ethical and moral values.” This can also be achieved by having pictures of children. It is not all about winning but conducting business as it should be done.

### *Align messages*

Many companies focus on the formal parts of a compliance program; the policies and procedures, committees to implement and enhance compliance and formal training. However, Lomer notes that if the unofficial messages are not aligned with the formal messages, there may well be a disconnect. Lomer concludes that you should think about the totality of the messages that your company is sending out to its employees regarding doing business ethically, “a proportionate amount of time should be spent examining the unofficial messages that your company is sending, and making sure that all these messages are aligned in a way that makes clear your ethical corporate culture clear.”

For all of us who have had or currently have teenaged children, we know that how we conduct ourselves sends as strong a message as what we say our message is. Lomer’s article takes this proposition and puts it in the context of doing business ethically and conveying that message to your employees. To drive compliance into your company’s DNA, you need to continually work to make sure that all the messages you are sending out as an institution are consistent, do business ethically and without corruption and bribery.

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