

## Elevating Ethics and Compliance as a Key Strategic Business Partner

Julianna Fox, Chief Ethics and Compliance Officer, WSP



### About WSP Global Inc.

As one of the world's leading professional services firms, WSP provides engineering and design services to clients in the Transportation & Infrastructure, Property & Buildings, Earth & Environment, Power & Energy, Resources and Industry sectors, as well as offering strategic advisory services. WSP's global experts include engineers, advisors, technicians, scientists, architects, planners, environmental specialists and surveyors, in addition to other design, program and construction management professionals.

### WSP's Program Framework

WSP's program is built on five pillars, which Fox describes as "a classic formulation of an ethics and compliance program." These include:

1. An independent reporting line up to the board of directors
2. Culture including tone at the top, training, and communication
3. Policies and procedures
4. Processes and controls
5. Auditing and monitoring

In this Spotlight with **WSP's Julianna Fox**, we gain a behind-the-scenes look at how a global engineering firm manages its ethics and compliance program.

WSP recently achieved Compliance Leader Verification, a recognition for organizations with an outstanding commitment to achieving a best-in-class ethics and compliance program.

### Making E&C a Strategic Business Partner

For most companies, ethics and compliance is becoming increasingly integral to corporate strategy. WSP has worked to elevate the status of the team and its leaders.

“We're very proud of how our program has evolved over the past five years. We've really been able to transform our ethics and compliance function into key strategic business partners. The team not only does training, implements controls, and monitors; they're also part of the executive level strategic decision-making process. It's been quite exciting to see that evolution.

The merger and acquisition process is another strategic business area where the ethics and compliance team is very involved.

“Another unique aspect of our program is how involved we are in the mergers and acquisitions due diligence process. WSP is a highly acquisitive company and we have a fine-tuned ethics and compliance due diligence process. It involves interviews with senior executives, questionnaires, detailed vetting, and looking into the internal investigations of the targets.

## Partnering with the C-Suite

For many, it can be a struggle to gain support from the executive leadership team. For WSP, the ethics and compliance team has been intentional about having rich conversations with leadership to get them to understand why the program is important, what is being done, and what risks they are tackling and mitigating.

“We're privileged by the tone that our leaders have for ethics and compliance. They're truly people that understand “the why” behind an ethics and compliance program. Once you have that understanding, it's much easier to get their buy-in and engagement to promote the program and support the ethics and compliance team across the organization.

Our relationship with management enables us to embed ethics and compliance communications into the organizational dialogue, including the messages from the CEO and senior management.

“**“A speak-up culture is key to a good ethics and compliance program. However, promoting the use of a business conduct hotline to increase internal reports can be counterintuitive for senior leaders. Understanding 'why' it's important that reports get filed is critical for leaders to be able to support a speak-up culture.”**

## The Importance of External Program Validation

“We are very proud of gaining Compliance Leader Verification. To us, it is an important milestone that we've been working very hard to attain.

We received positive feedback from executives and employees. They said how proud they were to work for an organization that took ethics and compliance seriously. To me, that was the most positive impact of the recognition.

## The Compliance Leader Verification Process

“The program assessment process is fantastic. You get a report, and you also get a meeting with the Ethisphere analysts who carried out the assessment. You gain a wealth of insight, not only from the raw data, report, and findings, but also from that dialogue where you learn about the differences between your program, and how it compares to other companies.

“ We used it as a set of audit findings. We sliced and diced the data and findings and put it in a spreadsheet to track resulting actions. The assessment allowed us to see where we're strong, and where we potentially need to improve. It helped us to design the initiatives that support the next strategic cycle of our program.

### Continually Improving Foundational Elements

“ We've just gone through a process to revamp our code of conduct to make it more reader friendly, as well as to have more visual assets, direct language, and concrete examples for our employees. The Compliance Leader Verification process reinforced that it was an area to improve. So we did, and we're very proud of our new revamped code of conduct.

### The Value of Ethical Culture Measurement

As part of the Compliance Leader Verification process, Ethisphere worked with WSP to conduct an ethical culture survey. It measures employee perceptions of the organization across eight pillars of an ethical culture.

“ We knew we had a quality program in place. The ethical culture survey allowed us to listen to our employees, understand how our program was living within the organization, and assess how and if the positive tone at the top was trickling down throughout the organization.

It also provided insights into the perceptions of different subgroups of employees with respect to the ethics and compliance program and leadership tone. Finally, we were able to identify some of the key areas that we had to focus on to potentially improve messaging.

“ **“Any data points we can get our hands on either publicly or through resource centers like the ones that Ethisphere offers are really valuable to us. It allows us to benchmark the quality of our program to other companies and peers that operate in the same area as us.”**

## Compliance Leader Verification

The Compliance Leader Verification is awarded to companies that have demonstrated a commitment to, and investment in, a leading ethics and compliance program. The process involves a rigorous review of the ethics and compliance program and corporate culture. It also includes taking the Ethics Quotient® (EQ), a questionnaire covering the elements of an effective program, and benchmarking results to the data from the World's Most Ethical Companies®. Ethisphere's experts also conduct extensive document review and interviews with executives and stakeholders.



Learn more at [www.ethisphere.com/clv](http://www.ethisphere.com/clv) and [www.ethisphere.com](http://www.ethisphere.com)



Ethisphere brings together leading global companies to define and promote best practices for ethics and compliance, and helps to advance business performance through data-driven assessments, benchmarking, and guidance.



Join our community of global companies collaborating around best practices.

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