

## SHAPING THE GLOBAL COMPLIANCE ORGANISATION AT THE LUNDBECK GROUP

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### CHALLENGE

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H. Lundbeck A/S has developed and communicated a Code of Conduct (CoC) to provide consistent guidance to ethics and compliance across the Lundbeck Group. During the autumn of 2010 the global CoC implementation was initiated, starting with a number of countries being part of Phase 1.

Lundbeck had a need for gaining an effective follow-up on and evaluation of the first phase as an important insight to the full global roll-out in 2011 with the aim of ensuring a qualified and successful implementation of the Code of Conduct in terms of effectiveness, satisfaction and behavioural impact. Moreover, Lundbeck wanted to gain knowledge and feedback to further strengthen and systematise the compliance work, e.g.:

- What is the sense of urgency regarding compliance issues?
- How do our people cooperate around practical compliance issue?

### APPROACH

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Lundbeck engaged Innovisor and Impact Consult in a partnership to assist with an analysis and presentation of findings which resulted in recommendations for management presentation and intervention. For this purpose a unique analysis approach was applied, enabling Innovisor and Impact Consult to gain data-based insight in how the compliance work is actu-

ally accomplished in the global compliance organisation.

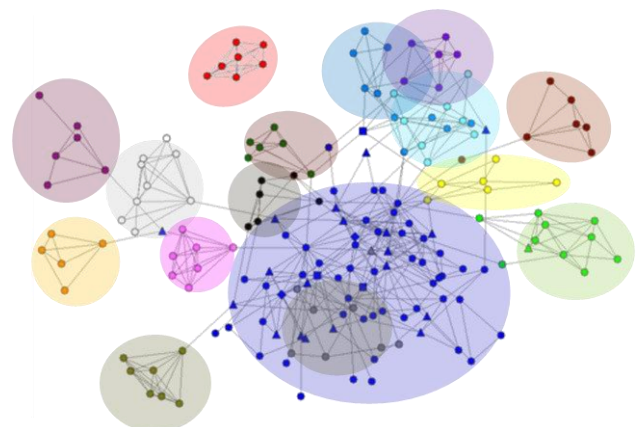
Moreover, barriers of collaboration were identified along with areas for improvement, including specific actions to realise the value and a successful implementation of the Code of Conduct.

Some 195 employees from 16 countries were invited to participate by an electronic questionnaire with a response rate of 82%. Focus areas for the analysis were topics such as work related cooperation between employees, knowledge about colleagues' skills, and awareness of colleagues that might be of help for each specific respondent in terms of effective collaboration.

### SOLUTION

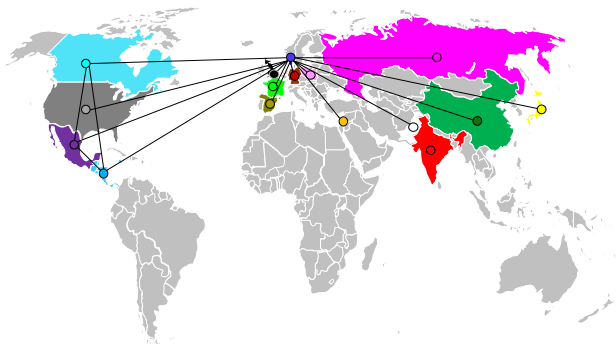
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Depicted below is a graphical overview of the compliance related collaboration within the global organisation. Each line represents collaboration between two people and colours represent location.



Collaboration within the field of compliance takes place across the organisational areas with limited collaboration between the subsidiaries. Location sets the boundaries for collaboration on compliance.

Collaboration across geographical areas primarily happens between HQ and the subsidiaries (see chart below).



*“Compliance is considered important to our business. However, successful communication and training in the Code of Conduct is a key challenge.”*

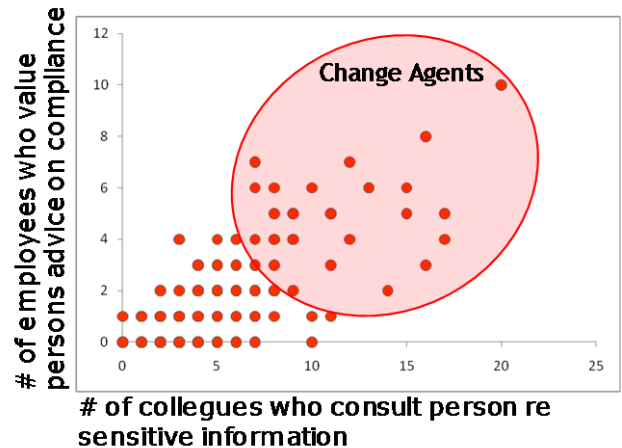
A statement from the analysis

To build a compliance network of key people Lundbeck focused on those “connectors” most employees turn to for professional advice and input - i.e. persons who colleagues trust and consult for advice.

Consequently, a number of ambassadors were identified for the Code of Conduct implementation and future compliance work.

The ambassadors will play a central role in building the global compliance organisation.

You can see how they map in the chart below.



**EFFECT**

Key recommendations from the analysis:

- Establish a global compliance network to support an effective and locally anchored implementation of the Code of Conduct, sharing of best practice and the ongoing compliance execution. This survey has identified potential ambassadors which improves odds for success
- Take action to strengthen internal processes and communication to support alignment with stakeholders and transparency in the compliance related work.

*“I experienced a great flow in the process from initiation to delivery of the final result. Other consultants can learn from your approach that in my view builds on your business insight, powerful methods and highly competent execution.”*

Uffe Kåre Rasmussen, Programme Manager, H. Lundbeck A/S

Co-project between Innovisor and Impact Consult, conducted Sept. to Nov. 2010