



## INTERNAL INVESTIGATIONS: BEST PRACTICES TO ADDRESS COMPLIANCE CONCERNS AND REDUCE RISK

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# INTERNAL INVESTIGATIONS: BEST PRACTICES

## (Critical Building Blocks)

A Speak-Up  
Culture

A Well-  
Defined  
Process

A Plan To  
Address  
Hurdles

Implement  
Lessons  
Learned



# BUILDING A COMPLIANCE-FRIENDLY/SPEAK-UP CULTURE

- Sets The “Proper Tone” and Foundation
- Encourages Business “Buy-In”
- Bolsters Participation Across Enterprise
- Fosters Open Communication and Trust
- Values Transparency, Consistency and Accountability
- Energizes Itself; Leads to Continuous Process Improvements



# A WELL-DEFINED INVESTIGATION PROGRAM

- Clear, Written Policies and Procedures
- Open Complaint Process – Engage the Enterprise
- Understand Scope of Claims and Areas of Impact
- Develop Investigation Plan (Applicable Policies, Documents and Witnesses)
- Open Communications with Reporter, Witnesses, Subjects, and Stakeholders
- Build Trust In System - Emphasis on Confidentiality and Non-Retaliation
- Follow The Plan, Avoid Rabbit-Holes and Pivot as Warranted
- Ensure Fairness, Consistency and Accountability Throughout Process





# HAVE A PLAN FOR THE INEVITABLE CONCERNS

- Identifying Key Stakeholders and Interested Parties
- Utilizing Tech Tools and Data Analytics
- Securing the Necessary Witnesses and Evidence
- Staying on Course: Don't Lose Sight of the Forrest through the Trees
- Protecting the Company: Engaging Legal When Necessary
- Preserving the Attorney-Client and Work-Product Privilege
- Preserving a Professional Relationship with those Involved
- Validating the Process and Keeping the Faith



## ITS NOT OVER TILL ITS OVER: THE VALUE OF LESSONS LEARNED

- Conduct a Post-Mortem: Work with Team to Identify Key Lessons Learned
- Analyze Root-Cause and Establish Necessary Corrective Measures
- Ensure Enforcement of Remedial Action
- Identify and Implement Necessary Systemic Changes to Mitigate Future Risk
- Validate Effectiveness of Corrective Measures: Confirm With Data Analytics
- Close the Case / Update Company and those Involved

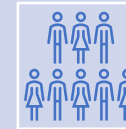
# WRAP UP: BENEFITS OF A WELL-DESIGNED INTERNAL INVESTIGATION PROGRAM



Greater Efficacy of Compliance Program



Reduced Legal Risk



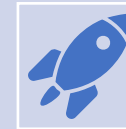
Greater Trust In Process



Better Corporate Reputation



Promotes Speak-Up Corporate Culture



Brighter Future



# QUESTIONS/IDEAS ?

