From Training to Campaigning: Transforming Teva Pharmaceutical's Ethics & Compliance Program



### AT A GLANCE

Teva Pharmaceutical changed their organization's global compliance training program from a "basic" activity to a campaign-based curriculum where employees now find their learning experience to be relevant, applicable, meaningful, and engaging.

# teva



### CUSTOMER BACKGROUND

Teva Pharmaceutical is a global company established in 1901 with 43,000 employees in 80 countries that produces approximately 120 billion tablets and capsules each year. They rank among the leading pharmaceutical companies in the world and focus on specialty medicines, generic medicines, over-the-counter products, and active pharmaceutical ingredients.

Today, Rachel Batykefer serves as their Director of Global Compliance Training Communications and Operations, reporting directly to the Chief Compliance Officer, Lori Queisser, and serving as a resource for Teva's regional compliance teams and compliance officers around the world. She's responsible for rolling out training, communications, and policies that relate to global compliance for almost 40,000 employees in 22 languages, including code of conduct, fair competition, bribery and corruption, conflicts of interest, and everything related to ethical interactions with members of the healthcare community, government officials, and commercial partners.

### CHALLENGES

"We were trying to be more engaging and approachable with employees, but it's really hard to be engaging and approachable when you only hear from somebody once a year."

Director of Global Compliance Training Communications and Operations Teva Pharmaceuticals

With over 13 years of experience in ethics and compliance, Rachel Batykefer joined Teva Pharmaceutical in September 2013 to improve ethics and compliance training and communications. At the time, Teva's E&C program took a "basic" approach to code of conduct and anti-bribery and anti-corruption training that used text-heavy, legal-centric, off-the-shelf content focused on rules, regulations, and punishment. Approximately 85% of the existing content she inherited was generic, not focused on the bribery and corruption challenges specific to pharmaceutical companies, let alone the specific challenges that Teva's employees faced each day.

#### RACHEL KNEW THAT SHE HAD TO CHANGE THAT APPROACH.

- The entire training experience needed to focus on ethics, culture, integrity, and behavior, and use realistic aspects of ethics and compliance as it related to employee's day-to-day roles and responsibilities.
- Some of the content would have to be customized, not just for her specific organization, but also for the cultural, linguistic, and regional intricacies of a global program and workforce.
- The design, layout, and format of the content itself would have to be dramatically improved in order to grab and sustain the attention of the employees to ensure they were engaged and that the experience was relevant to each employee.
- The program would have to constantly improve and evolve every year. Her goal was to work with a partner that was willing to build new content for her program with the speed and reliability she and her senior leadership required and expected.

Based on her previous experiences on ethics and compliance teams, coupled with the state of the existing program she inherited, Rachel knew she couldn't accomplish all of this alone. She needed an outside provider with a proven track record of building ethics and compliance programs to create a new-best practices program that would truly help her and Teva accomplish their goals.



# SOLUTION

"We don't want to be known as the compliance police. We want to be known as a resource. In my experience, the degree of approachability that a campaign-based approach to compliance creates helps break down those barriers."

- Rachel Batykefer

To find an outside provider that could help, Rachel embarked upon a detailed request for proposal process. Under Rachel's guidance, Teva's RFP articulated that they needed a provider that excelled in three key areas:



SAI Global was the selected at the conclusion of this thorough RFP process. Since the inception of their "new" program, in close partnership with SAI Global, Teva has moved its ethics and compliance training away from a generic, off-the-shelf, basic approach that used to train employees once a year and required hours of seat-time all at once, to an interactive campaigning methodology.

Ethics and compliance campaigns help change the mentality around compliance by focusing on the overall learning experience and providing multiple training touchpoints throughout the year. Each campaign is complemented by staggered and strategic micro-communications and resources that reinforce learning around these key ideas and risk areas.

Today, Teva Pharmaceutical's ethics and compliance campaigns consist of three experiences spread throughout the year, each of which come with a total time investment of 45 to 60 minutes. With this new approach, existing employees spend approximately three hours per year learning about ethics and compliance risk areas, all spread across a full 365 days.

Additionally, Teva identified the need to customize the training experience for new hires based on the risk ranking of their role. Using Teva's own proprietary ranking methodology to score the inherent risk of every new hire's job, they created an interactive training curriculum that could be customized for each risk ranking that was specific to its responsibilities and would create a positive first impression of the ethics and compliance program.



## Our Way of Life (OWL)

To help brand Teva's new campaign-based ethics and compliance learning experiences and the series of communications that accompany them, the ethics and compliance team created Our Way of Life, also known as "OWL." This acronym and the visually recognizable icon now symbolizes the program and accompanies all training messages. This branding assists greatly in making the ethics and compliance program approachable and recognizable across the life of a campaign.

## RESULTS

"Since 2013, we've really moved the needle in changing the perception of global compliance training from a basic obligation to something people think is relevant, applicable, meaningful, and engaging."

– Rachel Batykefer

#### BEFORE CHANGING TO A CAMPAIGN-BASED APPROACH:



of employees would complete their annual training in the first 50% of the rollout, leaving Rachel and her team to chasedown for the remaining 75% of employees to complete training.

#### WITH THEIR NEW CAMPAIGN-BASED APPROACH AND NEWER, SHORTER COURSES:

75% -85%

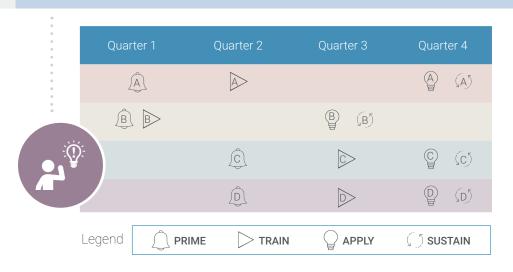
of employees complete the training without requiring follow up.

# That's more than a 300% increase from the prior methods!

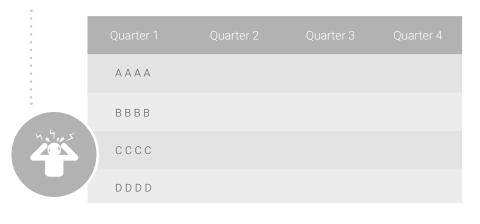
In addition to shortening the overall time spent on ethics and compliance training for each employee while sharpening and focusing the content, Teva has also seen an increase in completion rates and a significant shift in the engagement and perception with ethics and compliance across the organization.

Today, people proactively reach out with questions, comments, feedback, and help. Employees and managers have even expressed their appreciation and satisfaction with the new campaign-based approached. Rachel and her team created an inbox for anyone in the company to use for compliance questions. This was very well received by the employee population as it receives a steady influx of messages each month with compliance questions and requests from leadership which all helps drive ethical behavior. Managers that identify trends or patterns in behavior among members of their team will ask for additional training for certain employees, even if it isn't required.

#### WITH A CAMPAIGN-BASED APPROACH



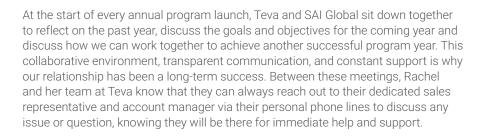
#### WITHOUT A CAMPAIGN-BASED APPROACH



#### WHY SAI GLOBAL

"People have asked me about SAI Global before – 'what's the difference?' Beyond the content and flexibility, the big difference for me with SAI Global is that it's a true 'partnership.' The conversations, the back-and-forth, the collaboration, and customer service aspect of what they do, hands down, was just critically important to me and SAI delivers all of this. It's continued to be a huge reason why we stay. Additionally, the openness and willingness to hear our feedback, apply our feedback, as well as their proven record of continuing to push the envelope for different learning types and the options in content being offered."

- Rachel Batykefer



The success and growth of the program has increased the expectations of ethics and compliance within Teva Pharmaceuticals. These results, combined with feedback and requests from the pharmaceutical community, have pushed SAI Global to continue to innovate and deliver new content within state of the art technology and learning techniques that truly assist with building ethical cultures and driving measurable program effectiveness.

