

## Charles River Labs Discusses Building a Compliance Brand

By Megan Zwiebel, *The Anti-Corruption Report*

One of the key elements of a compliance program is ensuring that training and other messages reach employees. But in a digital world, with stuffed inboxes and constantly chirping devices, compliance communications are often lost in a tidal wave of other messages. Matt Daniel, corporate senior vice president of legal compliance and deputy general counsel at Charles River Laboratories, realized if his compliance trainings and other messages were going to compete effectively for employee attention, his compliance program was going to need a brand that would make it stand out from the crowd. The Anti-Corruption Report recently spoke with him, along with John Dalton, Charles River's director of corporate compliance, about how they developed their I-Comply brand and their mascot – the Comply Ant™.

See "[MGM's Approach to Compliance Messaging: An Updated Code, Engaging Training and Unique Messaging](#)" (Nov. 28, 2018).

### *Identifying a Communication Problem*

**ACR: What led you to the conclusion that Charles River needed to improve its compliance messaging program?**

Daniel: I have been overseeing Charles River's legal compliance function since 2011. One of the primary ways we try to influence culture at the company is through training. For many companies, training is the most visible and prominent way that employees know and understand what the compliance function is and does. Back then (and even still today), employees would receive an email with a link to an outside vendor that provided the training. However, we were not getting the initial response and completion rates we expected. When we did a little investigating to get at the root cause of this slow response rate, we realized that our employees were getting a proliferation of communications about all sorts of valid initiatives from several different functions within the company.

Additionally, we are an acquisitive company and have grown substantially over the last decade through both large and small mergers and acquisitions. Integrating these new workforces effectively is key to achieving synergies from transactions. But as part of that integration process, compliance would be asked to take a back seat while new

employees were getting training on our operational and financial systems.

We realized that we were internally competing with other departments and functions for the attention and the time of our employees, particularly new employees.

**ACR: How were these multiple communications being pushed out to employees?**

Daniel: Over the last few years we have migrated to several different platforms for pushing out messaging. For instance, in addition to the ubiquitous emails that are sent out, we use a collaboration tool called Yammer and portals, such as our intranet site (iConnect), which publishes important articles of interest. Additionally, our work force is including more and more millennials who are not tethered to a desk (or even an office or single site) and are getting these messages on not just a laptop but also a smartphone or a tablet.

**ACR: What departments were you "competing" with in terms of training and other internal communications?**

Daniel: We identified at least six different areas that were competing for our employees' attention: corporate social responsibility, animal welfare, communications, security, human resources and marketing and communications.

[See "[Lessons on Effective Compliance Training and Communications From Compliance Directors at Microsoft and Genesys](#)" (Dec. 4, 2013).]

### *I-Comply and Comply Ant™*

**ACR: How did you determine that a compliance rebrand was the solution to this problem?**

Daniel: I attended a compliance conference around the time we were coming to understand this problem, and I noticed that other compliance departments at the conference were handing out sample materials with branding and logos and slogans. It impressed me as an effective way to keep compliance front of mind for employees. Once the workforce was familiar with a logo or slogan, every time they saw it, it would be a visual reminder of the compliance message.

**ACR: How did you choose this brand identity?**

Daniel: We had – what we thought – was a brilliant idea to hold a contest. We tied it to our Global Compliance Day, which is a celebration we hold every fall, usually in November, to raise awareness about the legal compliance program. As part of the Global Compliance Day program, we asked employees for their suggestions for a slogan. Unfortunately, the results from the contest were more humorous than we were expecting. Additionally, language and cultural differences turned out to be a bigger impediment than we expected.

**ACR: What kind of responses did you get to the contest?**

Daniel: Some focused on the name of the company and the water/river theme: “go with the flow of virtue.” Others were poetic and rhymed. Some took a very holistic approach: “Everywhere, everybody, be compliant;” “show compliance everywhere” or “we want compliance.”

There were also some suggestions that we incorporate a checkmark or that we have a mascot, and those were ideas that we kept. We walked away from the contest with a clear idea that we needed a brand name, logo and a character or mascot.

**ACR: You settled on the brand name “I-Comply” – why did you choose that?**

Daniel: It was a simple concept, but the words fold together and are subtly reinforcing. Just reading the phrase “I comply” subconsciously reinforces the individual and personal responsibility our employees should take in order for the whole organization to have a true culture of compliance. Compliance must be embedded in the business; ethics has to be a hallmark of the company’s philosophy. I love that the phrase “I-Comply” also serves as a personal declaration. Most of our trainings in the last year have included short videos from senior executives and at the end they will look into the camera and say, “I comply, do you?” That uses the brand identity to reinforce that we need each and every one of our 14,000 employees to be personally responsible for our compliance initiative.



**ACR: Why did you decide to come up with a mascot in addition to the “I-Comply” brand?**

Daniel: That was not our idea, but it came up a number of times in the suggestions – either an animal mascot or a superhero character. It seemed to be something that would resonate with the workforce so we decided to run with it. It took some time before we settled on our Comply Ant mascot.



*Utilizing In-House Resources*

**ACR: What role did Charles River’s marketing department play in the development of your compliance brand and mascot?**

Daniel: I had developed a great working relationship with our marketing team, particularly Bob Zaccardi, our head of creative services. I first approached him in 2012 when we were redoing our code of conduct. Before that, our code had been very legalistic and dry – it looked like a legal memo, written by a bunch of lawyers (which in fact, it was). When we decided to redo the content of the code, I also asked Bob if his team could help me make it a more visual document, one that would live more in digital form than paper. He enthusiastically jumped at the opportunity.

When we started developing the compliance mascot and logo, it was natural for us to ask Bob to squeeze us into his schedule.

**ACR: What have been the benefits of using your in-house marketing team for developing the compliance brand?**

Daniel: That has been a way for us to keep our costs down and limit our external spend. It has also helped us ensure consistency in our materials as compared to the company’s brand standards. Bob knows Charles River’s preferred typefaces, fonts and colors. He also has a wealth of photos of Charles River employees in action in both the laboratory and offices which help add authenticity to our compliance materials.

**ACR: How do you maintain a positive working relationship with the marketing department?**

Daniel: The lion's share of Bob's focus is on commercial marketing and we have to be very conscious not to absorb too much of his time and resources. But I think he truly enjoys and sees value in helping the compliance program.

Dalton: We treat marketing as a true partner. That term gets overused in compliance presentations, but I think it really applies here. Every time we work with Bob and his team it is iterative, building on what we have done before.

One key to making that relationship run smoothly is being respectful of their time. We try to never put Bob in the position of saying that we need something by tomorrow.

The other key element has been giving Bob and his team autonomy and artistic freedom to create. We come to them with ideas, but they have the flexibility to come up with something they are excited about.

**ACR: How has the creative process worked logistically?**

Dalton: We typically approach Bob with a rough idea of what we want and then he comes back to us with a few different options. It is almost like working with an ad agency – he gives us that level of support. It's a great way to do it because then we have something to react to and discuss with him.

Daniel: We try to not profess to be experts in this area. We are lawyers, not marketing professionals. At the same time, this is one of the more enjoyable and entertaining parts of our job, so we try to make it fun for everyone involved. A project like this – coming up with a brand identity for the compliance program – is a great way to allow people at the company to exercise their creative muscles in a way that might not be part of their regular jobs.

**ACR: What external resources did you use for this project?**

Dalton: Our biggest spend on anything the compliance department does that involves communication is translations. That is probably true for any global company. Some companies have the ability to translate in-house but for Charles River largely it has to be outsourced. So, whenever we create something written, translation is our biggest cost. Currently we translate in 10 or 11 languages.

Another thing we had to go outside for was intellectual property legal assistance.

We also used external vendors for producing videos and swag to give out on Compliance Day. We have an in-house videographer, but her calendar is frequently very busy, so we occasionally have to go to an outside vendor.

**ACR: Why did you need intellectual property legal assistance?**

Daniel: Being lawyers, we naturally couldn't help but want to make sure that we trademarked and copyrighted the things we produced and that was not a capability our legal department had in-house. An in-house legal and compliance department is usually a cost center for the company. I thought that if there was ever an opportunity to license the brand or logo and make the company a little bit of money we would be viewed as heroes! We put all of the work in, so the least we could do was protect our IP, even if making money off of it isn't our objective at the end of the day.

**ACR: What type of swag did you give out using the Comply Ant mascot?**

Dalton: We have done a bunch of things which have had varying reactions.

This year, our Compliance Day theme was GDPR and data privacy, so we gave out camera covers for employees' laptops that had our I-Comply logo. Those were very popular and now everyone who has one on their computer camera is literally looking at the words "I-Comply" all day long. We also gave out water bottles and socks, but the camera covers were the most popular by far.

Other things we have done in the past have had more mixed reception. For instance, we took the idea of doing an adult coloring book from another company I had seen make a presentation to us. John came up with the content. Each page was about one stand-alone compliance risk area with a list of dos and don'ts. Bob gave us a member of his team to work with and that person had tremendous freedom to create a picture for each page to be colored.

Many of our employees are very senior scientific people with PhDs and lots of experience. In one non-U.S. location we received feedback that the coloring book was childish and beneath the level of these types of employees. That stung but was good feedback to have.

Daniel: With the coloring book, we shot ourselves in the foot and did too good a job because those people thought we had wasted money on something expensive – even though the coloring book was produced entirely in house and the

printing costs were minimal. But that was good, eye-opening feedback. For all of our compliance initiatives we try to attend to cultural differences but this one side-swiped us. Clearly the adult coloring book craze we were seeing in the U.S. had not permeated other parts of the globe.

### *Results*

#### **ACR: How is the mascot helpful in getting the compliance message across?**

Dalton: Now that it is in use, the Comply Ant mascot has become very recognizable to employees. They see the ant and they know that the message is coming from the legal compliance department.

The mascot also helps make compliance seem less legalistic and more approachable. We started to use the mascot in different contexts, such as a conflict-of-interests situation or answering a helpline call. The Comply Ant has helped us make what can sometimes be a dry topic more fun.

Daniel: There is a flexibility with a mascot, particularly a drawn and animated character, that allows us to do almost anything. For example, for Compliance Day this year when our focus was on GDPR, we went back to Bob Zaccardi and said we would like to have Comply Ant holding the flag of every country where Charles River has a site on a backdrop of the globe. He was able to produce that for us in a day.

#### **ACR: Now that the brand and the mascot are fully rolled out, has it solved the problem you initially identified of competing with other departments for your employees' attention?**

Daniel: We don't have a definitive answer for that. I liken it to trying to measure market share for television shows. With more and more streaming options, no matter how many viewers a program has, the share of the market is always going down compared to previous years because there are more and more competitors. It is similar for us. Compared to where our compliance program was four years ago, there are many more opportunities for our employees to avoid our messaging. However, I think we are holding our own overall.

Dalton: It is always difficult to find compliance metrics that solidly reflect the success of an initiative. I do think that it has solved the problem of making it clear that a communication is coming from the legal compliance department. We are getting more feedback – good feedback – because the communication channel is more transparent – employees have a better sense now of who is behind the training or video we send out.

[See [“Finding the Softer Side: VMware’s Senior Director of Ethics and Compliance Discusses Her Department’s ‘Re-Brand’”](#) (Jan. 24, 2018).]