



## The Internal Comms Podcast – Season 9

### Episode 84 – Jonathan Satinsky, *Ethics in action: Insights from a global compliance leader*

#### Transcript

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#### **Katie 00:03**

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#### **Katie 00:30**

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#### **Katie 00:51**

Welcome to the Internal Comms Podcast with me, Katie Macaulay. This is a show devoted to exploring how we can improve communication at work. My guests are usually from the world of communications, senior practitioners, consultants, occasionally authors and academics. But some of my all time favourite guests have been business leaders, and this conversation is no exception. Jonathan Satinsky is Group Head of Ethics and Compliance at Johnson Matthey, or JM, as it's often called. JM is a global leader in sustainable technologies with a history stretching back more than 200 years. It has almost 13,000 employees and operates in more than 30 countries around the world. Its customers are in the energy, chemical and automotive industries and they rely on JM to help with their decarbonisation, lowering their admissions and meeting their sustainability targets. Jonathan is a member of JM's senior leadership team and has responsibility for managing JM's ethics and compliance programme.

#### **Katie 02:11**

Now, I initially met Jonathan because my colleagues at AB are supporting with a launch of JM's new code of ethics. And within minutes of that first meeting, I knew he would make a great guest on this show. The importance of all organisations operating with integrity, meeting their regulatory and legal obligation has never been greater. Every organisation is facing greater scrutiny, and not just by regulators, but all their stakeholders, internal and external. I am very grateful to Jonathan for being so open in his answers to my many questions. We talked about the early days, his switch from being an attorney in private practice to working in-house. We talk about the challenge and the importance of building an ethical culture, of ensuring colleagues speak up, of setting the right tone at the top, but also getting to the middle. As Jonathan puts it, we talk about the greatest risks all organisations face today and his team's innovative way of measuring JM's ethical culture. For me, it is always fascinating to shift the perspective and hear directly from a business leader to get a glimpse into their day to day reality and challenges so that we can ultimately



gain a better understanding of what they need from us as comms professionals, listeners, I hope you enjoyed this conversation as much as I did. So, Jonathan, welcome to the Internal Comms Podcast. It is a pleasure to have you here.

**Jonathan** 04:06

Thanks so much, Katie. Great to be here.

**Katie** 04:08

I'd like to start with talking about you first and your background. You spent many years working as an attorney in private practice. Now, I'm guessing that's probably nothing like the TV show Suits. I kind of want it to be but I'm guessing it isn't. Can you talk a little bit about your specialism and whether I'm right or wrong about suits?

**Jonathan** 04:30

Totally right. Totally right. And unfortunately, because that's why everyone goes to law school in the first place. Right? Because they think that's what it's going to be. Either that or Ally McBeal, I'm convinced it's one of the two. Absolutely, yeah. So I spent a number of years in private practice, as you say, doing white collar defence government investigations. So really, primarily on the criminal side of things defending organisations, multinationals and smaller enunciations, companies, as well as individuals there who are caught up in matters with either Department of Justice or Serious Fraud officer, you know, one of those big enforcement agencies, as well as compliance and regulatory matters. It was great. It was fun while it lasted, I am grateful for all of the experiences I got, frankly, they grew me up really fast. And it served a point in time. Before I was ready for that next step,

**Katie** 05:31

Were there any lessons in communication that you learned through your time in the courtroom?

**Jonathan** 05:38

For sure. So I think, one, keep it simple, whether you're interfacing with the jury, right, so your peers or a judge, we're all human. And we can only take onboard so much. And that applies today. Whether it's the Board, it's the GLT, it's my team, or others in the organisation, right, keep it simple, be relatable. I'd say that's probably one of the things I've come to appreciate most, you kind of go through this maturation process or evolution, I think many of us do, where, certainly as an attorney, and I think it's probably the same Katie in your field, and most others where you start off early on in your career, and you think that you need to just know everything, you need to be the master of everything. And you are the subject matter expert, essentially. And then you realise equally as important as knowing your stuff, is how you convey that, because you can know everything in the world, but if you can't convey it, and this is obviously what you do so well, it's meaningless. So that would be the second.

**Jonathan** 06:52

I think the last one is, don't be overly emotional. This is a tough one. For me, to be honest, I'm a very passionate person, as you've come to know. I believe in what I do, which is absolutely a strength of mine. And equally, you need to ensure it doesn't undermine your credibility. And I can vividly recall a trial, we were representing a individual on that case, and I absolutely believed hand to heart, right, this guy was wrong place wrong time. Not an ounce, not an iota of bad blood in him; did not have the criminal intent. And I thought it was frankly ludicrous that the government was going after him. And while that served me really well, in terms of working up the case, and zealous advocacy, which is often what you think about as an attorney, or one that's appearing in a courtroom. I probably took it a step too far. I had just gotten off a cross examination, I had my TV moment, if you will, perhaps the only one in my career, and I thought I just totally eviscerated this government witness and had really crossed them up. And the story now didn't hang together. And the government was going places that I thought were just totally out of bounds at this point. And instead of letting the judge do her job, I was trying to intervene, right, and I jumped the gun. And I was caught up in the emotion of it. And that's something that has stuck with me and the importance of that. And again, it applies in the corporate setting equally. The stuff I'm dealing with I know we'll chat a bit about kind of what it is I do day to day. It's really sensitive stuff, right? It's potential criminality involved. Its ethical, its moral, its values, it's all this stuff. And you need your stakeholders to view you as a sane person, as a credible person, right now someone who's just looking to put heads on spikes. But actually, you're coming at this through an objective lens.

**Katie** 09:19

Yeah, that makes perfect sense. Your job title today is Group Head of Ethics and Compliance. But I know from past experience that a job title can tell you very little really about the day to day work that someone does. How would you describe your work to a lay person?

**Jonathan** 09:40

The clue is in the title. So it involves both ethics and compliance. So it does capture that bit of it. Listen, what we focus on, we have a number of key risk areas. So bribery and corruption, competition or antitrust, depending upon where you are in the world, export controls and sanctions, data protection, conflicts of interest, these types of matters, that's the compliance side of the house, then there is the ethics side of the house and the two go hand in hand, right? They are not mutually exclusive.

**Jonathan** 10:17

The view is if you've got the right ethical culture in place, doing the right thing is how we refer to it at JM, that will drive the right behaviours, the right decision making on the compliance side. So that's how they come together. And that's very much focused around the ethics side, the code of ethics, which we own, we have an Ethics Ambassador Network. So that's 120-some individuals who have full time day jobs, and do this sort of our eyes and ears and ambassadors, as the name suggests, for the ethics programme within the business, so that folks have something that's a bit more relatable. And it's not just someone at the centre, who they may know, may not know, whose name they may have seen may not

have seen, right. It's about people feeling comfortable, discussing, communicating, airing, whatever issues concerns they may have, so we can address it on the front end. Just to say maybe a touch more on what it is we do, I think of it as preventing bad stuff, the for lack of a better term, from happening. That is my job in large part, right, I want to be proactive, yes, there is a reactive component. But I'd much rather be on the front foot, preventing bad stuff from happening, addressing it before it becomes a big issue. I also say that it's, as I'm dealing with more senior folks and decision maker types, my job, our role is to ensure it's eyes wide open. And what I mean by that is that they have the facts they need in order to make informed decisions. They are the decision makers at the end of the day. And these are not issues we're talking about if it's getting up to that level, but they need to understand the pros, the cons, the potential impacts, so that they can make a fully informed decision.

**Katie** 12:21

Just picking up on that point, because I think there's a potentially a naive view that ethical decisions should be quite black and white, something's either clearly wrong, or it's clearly right. But in speaking to sort of prior to this interview, you made it clear that actually, as you say, there are a lot of grey areas in this space.

**Jonathan** 12:39

Indeed, yeah. Wouldn't be fun if it were all just that easy, Katie, they would put me out of a job as well. Quite right. So listen, legal compliance is quite black and white. Actually, those are the easy things, right? Yes, no, we can or we can't. Okay. But that's not why I'm here. That's not why I have a team. That's not why the organisation, right, that's what they're looking for out of us. So if you think about Russia, for example, over the past couple of years, presented a whole host of thorny questions. Sure, there are sanctions in place, Western sanctions, which prohibit certain types of interactions or transactions. But it's not across the board. It's not everything. So then you're faced with, well, even if we can do this piece of business, should we do this piece of business? And then you start taking into account, well, maybe ethically, we don't feel comfortable, then how do we balance that up with our legal obligations, because we have contracts with these folks, which may bind us to do this piece of work absent, you know, some legal compliance issue. And if we're saying it's not sanctioned, it's not prohibited, that I don't have that out. So how do you weigh these things up? Right, or, we have a customer let's just say, for example, with tangential links to an unsavoury individual somewhere in the world, right? And chances are pretty good in a multinational, you're gonna come across that and it ain't just gonna be once it's gonna be a lot of times, because we're operating all over the world. And this is an interconnected world, right? Yes, it is globalised, that ship has sailed. And if you pull a thread hard enough, it very well may lead to someone somewhere at some point in time, who has done something that is inconsistent with what you stand for as an organisation. Well, when, where do you draw that line? Right and you can imagine the others, our technology feeds into a whole host of end uses. Right? So we're across the energy, we're across transportation, we're across the chemicals sectors as well, we may supply it to somebody, who are they supplying it to? What is the end use of that product? Is that something that we feel good about? Is that something that is consistent with our vision for a cleaner, healthier, more sustainable world? Right. So



you can imagine how these grey area issues arise. And that tug and pole, you know, that we confront?

**Katie** 15:41

I imagine in that complex web of interconnected relationships, options, grey areas, what then is so so important, is a very rigid agreed framework of all values, or call it what you want, guiding principles that tell people this is what we are as an organisation and what we're not?

**Jonathan** 16:05

100%, 100%. Yeah. And that is what we look to our code of ethics for. No, no, you have been very helpful in that regard, as we think about the next version, and what that looks like. And those are the rules of the road. Right? Right. That does dictate, fundamentally, this is who we are, this is not business at any cost. Yes, we run a business, yes, we have to be commercially competitive. And there just are certain non negotiables. And that is where the values comes into play. One of our values is acting with integrity as an organisation, which speaks directly right to this space.

**Katie** 16:47

And all of this is climbing up the boardroom agenda. And there's lots of reasons for that. But I think I'd be great to get your view on that. I mean, I'm seeing all organisations, public, private, under greater scrutiny, people care more, not just about what the product does, or the service does, but the process that led up to developing that. From your perspective, why you seeing this greater focus and emphasis at a boardroom level on these issues?

**Jonathan** 17:12

I think it's threefold. Really, right. So people care about these issues, more so. And that includes employees, that includes prospective employees. Think about the younger generations, right? We know the evidence shows that they care about this, when they're looking for a potential home for a prospective employer. And the money cares, ie the customers care. Right. So they're driving that. So I think people care about these issues is one part of it.

**Jonathan** 17:44

The second part is enforcement. Authorities continue to ramp up their efforts, and they're getting really good at publicising this. And that's for a deterrent effect. And so organisations are taking note, as well as they're offering certain incentives. If you come forward and make certain self disclosures, they will give you certain cooperation credit, reduce any potential fines. And that potentially leads them further on down the trail to the next, you know, potential bad actor, if you will. So everyone has this mindset that they're being watched. Right. And that's by design.

**Jonathan** 18:26

I think the final bit is ESG. I mean, you know, it's been the three most used letters probably in the past couple of years, as we all have come to know, reputation matters. Boards are



focused on this stuff, they have certain responsibilities. And so it flows from a combination of those things. To my mind.

**Katie** 18:48

I wouldn't mind asking you a little bit about the cultural aspects of your work. How would you describe the kind of culture you're really seeking to build? And what are some of the barriers in the case of JM? What are some of the barriers you face in building that culture?

**Jonathan** 19:03

I love this question, Katie. Because this is this is what I talked about with my team, this is how we move this thing further to the right, how we further modernise what we do. I stand on the shoulders of giants before me who have set up our function and given it the appropriate governance and the policies and procedures and the systems and the etc, etc, etc. And we've established our credibility over time by doing the good work that we do. And if you think about then, how does this stay relevant? How do we remain relevant and not just a tick box, because the day that we become a tick box, I'm done. I have no interest, right? That doesn't motivate me, that doesn't excite me to get out of bed in the morning. How do we keep it relevant? It is the ethical culture piece of it to my mind, and what I'm talking about there is openness and transparency so that we are able to address the issues before they arise as I was referencing just a few minutes ago, really embedding in the mindset so that people believe. And it's not just words that we have absolutely zero tolerance for retaliation, full stop, that an ethical culture is part of our DNA. I talked about this a bit. This is the way we do business around here. That's what you want. Every new employee, every current employee, every prospective employee, every third party customer up and down your value chain, to know that this is your brand, this is part of your brand and stamp it with that. And of course, this all feeds in and ties together into our broader work we're doing as an organisation on culture, where we're looking to simplify, ensure people are accountable and holding themselves accountable and holding others accountable and executing, driving results. So it beads up, and through to that.

**Katie** 21:22

I just want to come back to the retaliation point, just in case people aren't clear. What you mean by that is, there is a no blame culture, that you can come to the table and raising a concern. And you don't have to worry that you're going to be reprimanded for that or whatever. People worry about putting their head above the parapet, we hear this a lot. That's what you mean.

**Jonathan** 21:42

Yeah, exactly. So if you think of we have a Speak Up programme, it's a hotline which virtually all multinationals out there have, and to the extent people have concerns, issues, ethical compliance, what have you, they can avail themselves, use the hotline, right. As long as it is brought in good faith, there's no punishment, there's no one is going to take that out on you. If you self identify, we will not tolerate it. If for whatever reason, somehow it leaks or someone suspects that you, Katie, are the one who has raised this concern, you will not suffer any repercussions, job wise, whether it's overt or covert, right, we take a very hard

stance on that. And the reason for it is that is how you address things on the front end, we want to hear about everything, even if it turns out not to be proven, where we don't have enough evidence to establish it with certainty, doesn't mean it didn't happen, just means we have limits as to how far we can go with the tools right at our disposal. We're not a government agency, we don't have subpoena power and the like, you don't have to worry. It was brought in good faith, you did the right thing. To the extent remedial measures are appropriate, we'll put those in place. And let's move on with our lives. That is a healthy culture.

**Katie** 23:16

I've heard you talk about the importance of getting to the middle. When it comes to some of these sort of cultural aspects of the work. Can you explain what you mean by that, and why that's so important?

**Jonathan** 23:26

So you often hear tone at the top. That's something that's used in the space a lot. And it absolutely means something. I actually cringe when people throw it around and don't actually internalise that or understand why that's something that is so important here. I mean, if you look at the enforcement agencies, again, the likes of a Department of Justice or Serious Fraud Office, or any host of others out there in the world, they typically put this as the first element they're looking for in a quote unquote 'effective compliance programme.' And why is that? It's because you cast a shadow, right? As a leader, and that is where it starts. If you're conveying the right message in the right manner, others will follow your lead is the thinking. And that's right up to a point, but your shadow only casts so far and so long and so wide. And in an organisation we're now I think, 12500, let's say 12,000 to 13,000 employees. There's a big middle there. In fact, that's where the greatest numbers of our employees sit is in that middle. And that's where people are pulling right from their reports, as well as being pulled from people higher up the organisation so you're caught in between here, this is where a lot of the tension lies, right. You're telling me hit budget, you're telling me do it faster? You're telling me do it smarter? You're telling me do it leaner. Right? What gives? And so it's this idea that once you've gotten through to the top, or you feel like you've gotten enough of the way there, you need to work on the rest of the organisation, you can't just stop at the top, because you'll only reach a portion of the organisation there. So I'm talking about the plant managers, in our case, right? Or the operators. This is where they are actually living it day to day at the top. It can be a bit of word salad. Yes, but it's in the middle where they're actually living it.

**Katie** 25:47

How important are your ethics ambassadors in that endeavour, then, to actually make sure that I would call that the squeezed middle, as you say, squeezed from the top? And from below, essentially, how important are the ethics ambassadors in this or there are another other levers that you pull?

**Jonathan** 26:05



Really important. The ethics ambassadors, because they are an identifiable face, they are a person, at the plant level or in the office, depending upon the person's role, who you know, or who you're at least familiar with on a facial recognition basis. If you think about it at its core, we're about raising issues to the fore so that they can get addressed. Well, these are uncomfortable kinds of things for people, right? They don't want to be viewed as the tattletale. They don't want to suffer potential repercussions if they raise something, that's why non retaliation and pressing that upon people is so important. But is it worth it to them? In the end, they have a family to feed, they need to meet bills at the end of the month. They feel like they're putting themselves out there. Are they right? They're making an observation or not? Do they have the appropriate expertise to weigh in on this issue? These are all of the thoughts that go around right in someone's head as they're thinking about "is it worth me sticking my neck out there?" So the ethics ambassadors absolutely have a big part to play and just lending an ear, serving as a sounding board, helping them work through some basic steps and ensuring they get the right person if it requires that sort of attention or escalation. So ethics ambassadors, big. Other levers, you asked Katie that we pull on, I mean, it speaks to comms more widely. We have a quarterly report that we'll put out and send to certain levels of the organisation airing, in a way that protects the innocent and in a sanitised way, some of the issues we've encountered and how they've been addressed, to create that awareness to help drive some of that ownership at the levels. And it's not just everything happens behind closed doors, you know, hush hush secret secret, it's important that you air these things, and you are incorporating some of those lessons learned. Equally, it's important you're communicating the consequences. And people know that we're not just going to slap me on the wrist, if there's something serious going on here. We're not looking to exit people, you know, I absolutely adore the the folks I work with on the whole. But if someone makes a serious misstep, and it's for nefarious reasons, you're gonna suffer the consequences. And we don't make any exception. for that.

### Jonathan 28:52

We do things like an ethics week. So that is a campaign we run. Typically in the fall time, it corresponds with World Ethics Day, that is something that outside of JM, but we kind of align ourselves to and use that opportunity. So a whole host of things like that weekly newsletters that go out on a company wide basis, we may include a line or two about what's going on in our space or an ethical dilemma. Or maybe it's even ethics moments. We have safety moments in the organisation, kicking off a meeting with an ethics moment and creating some conversation and dialogue on that line.

### Katie 29:30

From what you're saying, it's clear that that the message is, I often say this, the kind of, you know, the medium is the message. But it's interesting that what you're talking about here is very direct, open, transparent communication about these issues. And I'm guessing also making it very relevant because it must be tempting, I can imagine, for some organisations stay at quite a high level with a framework but not actually get very specific about, no, when this happens, this could result in an ethical dilemma, and really spell out an example of that, to bring it to life? That must be so crucial. Right?





**Jonathan** 30:04

Great insight. Yeah, I mean, I think those are lessons we have learned over the years, and we are doing much better now. We're seeing that it's landing with people. So it doesn't need to be all the time. I do believe in a cadence, a drumbeat, drip, drip, drip, something I talk about, because it's not a one and done thing. It's not just about that ethics week campaign once a year, and then everyone goes home and goes back to their day jobs. No, we're talking about this is part of our DNA. It's part of our, our core fabric, right? You need to constantly do work on that. To your point of examples, we absolutely, yeah, have a bank, a scenario bank out there, and that we are constantly refreshing, revisiting. We push them out on a periodic basis, whether it's quarterly or what have you, so that folks can see some of those real examples and real Johnson Matthey terms, right, and they can surmise. They have this picture in their mind of this instance, this matter unfolding. So really useful.

**Katie** 31:17

And just coming back to the ethics ambassadors, I think there's one last question that listeners might have about that, because having networks of ambassadors and champions is not unusual in organisations, but sometimes can be quite difficult. As you say, your ambassadors, it's not their day job, they sort of volunteer to do it potentially. Do you have any advice for keeping those kinds of networks alive, engaged and energised?

**Jonathan** 31:40

Listen, we, we put a lot of energy into that. There's more we can do. Because if you are not disciplined about it, it is something that can fall to the side, right? And it's sort of nice to have, or it gets dropped to the backburner because it's entirely in your gift as to how impactful you want this network to be. So we have it within someone's job description, part of their responsibilities, that they are going to lead this network, right. It's not their entire job. But that is a piece of the job. And that creates that discipline and focus there. Listen, in years, many years past, it's been a while, we have done Ethics Ambassador conferences, where we've brought them all together, the macro environment being what it is, unfortunately, we haven't been able to do that recently. But there are other things we can do. Right? So certainly you think about quarterly type calls so that everyone's clear on what the agenda is, what it is we're trying to drive home here. Right? If it's one or two core things for the quarter, what are the issues that we're seeing? We have a formal onboarding process with them, which includes the rules of the road, right? What are their jobs? It's almost it's a JD, right? It's a job description. This is what this role is about. So they understand right? What it is and what it is not. We go around, when we go out for site visits. My team, the legal team, we encourage senior leadership, the GLT. Equally, when you go around to a site, find the Ethics Ambassador that's associated with it. Yeah. And just talk to them. Just talk to them, what's going on? How's life? Anything I ought to know, right? And something as informal as that is really, I think, impactful. What are some of the other things we do with ethics, ambassadors are to kind of ensure that they remain relevant, we include them in things like our ethics week campaigns, we're going to be including them, as you know, in the code development and helping them establish some level of ownership in that. So anything that makes them feel like they are co creating, they're collaborating, that they have a voice in this, and they have a seat at the table, I think all the better.

**Katie** 34:09

All of that really underscores a comment that you made to me when we were preparing for this show, and you said that simply saying, "My door is always open to colleagues" is not enough.

**Jonathan** 34:20

It does go hand in hand. Exactly. Yeah. We're talking about human behaviour at its core, right. And companies, don't act people. So how do you get through to people in your day to day it's no different. How do you go up that trust pyramid with people in your day to day, it's no different, right? Let's not let's not trust it. That's what it is. And if you want people to come to you, or me in this instance, or my team or what have you, they need to feel comfortable doing so. But if they don't know you, they're not going to feel comfortable. So if you say, and we talk about this with our ethics ambassadors, we talk about this with our plant managers, despite how well intentioned you are, and I know you are, when you say, "my door's always open," come to me with whatever's on your mind, if they don't know you, if they don't trust you, they're not going to do it. So you might as well not make the offer. What we've been doing over the past year, I'd say, is really making a conscious effort, and we're not there yet, we got to do a lot better as an organisation, but for everyone almost to embody this mentality of a plant manager, where you're just walking the floor, just talking to people, five minutes, two minutes, 10 minutes, whatever it is, how are you? What's going on? Don't you have to ask? Is there anything I ought to know? Right? Yes. And it suggests that you're there for some reason, actually, I found no agenda at all, is the best time to be there. Because then you are developing genuine relationships, and people can see and feel that you care, and you value what they have to say. So that's what we mean when we when we talk about needing to get to the shop floor, just saying the door's always open, not good enough.

**Katie** 34:20

I've got a big, it may be quite a tricky question. But I have to ask this on behalf of listeners. Say you've got an internal comms manager, head of internal comms, they've got a big meeting coming up with a senior stakeholder in risk and compliance. What advice would you give to that internal comms person? Is there anything they should be paying attention to? Are there any smart questions they should be thinking to ask in the room when they get in?

**Jonathan** 37:00

They're coming out from the from the other perspective? Exactly, I think, focus on the issue. The facts. What is the potential impact? Yes. What are our remediations? And then the comms plan? Who, what, when, where, why, how, it's the basics, right? Keep it simple. I say that frequently. But keep it simple, don't overcomplicate things, everything, you know, much better than me, but be conscious of who your audiences are, who the different audiences may be, that you may not have intended. And I think for all of us to remember, if you are operating a business, you cannot eliminate risk. You can mitigate risk, but you can't eliminate it. By definition. If you're in business, there is some risk, and that's okay. Right. So just keeping that at the front of our minds, I think at all of our communications.

**Katie** 38:18

And also, I suppose being aware that although you may be a comms person, every different organisation, I'm not I'm not sure if it's true of different organisations in the same sector, or if it's just true of different sectors, is going to have a slightly different risk profile. So the closer you can get to the thing, that's what you said up front, the actual risks your organisation is facing, the better?

**Jonathan** 38:44

Yes, then we need to make this real, you need to make this real. The examples, the war stories, that needs to feel like Johnson Matthey, in our case or whatever your organisation is, it's not good enough to just simply pass along some generic headline for a bank. And we're a manufacturing company. Very different. Very different.

**Katie** 39:11

Yeah. In preparing for this interview, I read a post of yours on LinkedIn where you write Yep. Do my research diligence. Have to every time! You write "Can't measure ethical culture? Think again." Can you talk us through the way that you tackle that challenge of measurement? Because I believe you have something called a measurement heat map?

**Jonathan** 39:36

Yeah, ethical culture heat map, and I'll just pat ourselves on the back a couple and in my team actually developed it so I can't take credit for it all. The Institute of business ethics recently held it out does an example of what good looks like really and in this space, which was great to see. And why we did this is because we found we were frequently having conversations with the board or GLT, senior management or even in the middle, frankly, yeah, people would say how do we know if we're doing better? Right? Or how do we know if we're even doing good? Or? Well, what you often hear from people in the space and ethics and compliance space is doesn't lend itself to measurement.

**Jonathan** 39:36

Unfortunately, I know that business folk love a good KPI. But I'm not quite sure how to come up with one that means anything, you know, okay, the number of speak up reports we've got. But is that good? Or is that bad? I mean, exactly high number. Maybe that's everyone feels comfortable raising their concerns? Maybe it's, I've got a whole host of issues on hand, I don't know what to make of that. training completion percentages? Well, I have a high level of training completion percentages, does that mean that people actually understand it? Or did they just take the course and click the boxes and, you know, tick on. So we were faced with this issue. And actually, we did incorporate components of each of those, speak ups and training. And actually our employee engagement survey USA, which has a component focused on ethics, as well as a bit of a more targeted survey of ethics. Ambassador types are those locally who may have a bit more of a finger on the pulse, you know, in terms of how things are feeling there. And what we've done is we've weighted them differently. And it covers those sites with at least 100 employees, because we find that if you get really much lower than that the data can be distorted. We're working on that. Or it can become

normalised if you will, but still, that takes into account, you know, 20 plus, 25, sites, whatever it is, so a pretty good starting point. And we see, okay, out of 10, or out of five, or whatever it is, how do we score, we bring it together, you know, into a cumulative score, and then it lends itself to a rag sort of red, amber green, you know, status, and then we could target, okay, if training's lower, "Oh, we didn't realise that here, we're gonna go out to this site and make a concerted effort." Or "Oh, speak ups..." the way we're tracking that is, we've come up with a mean number that we would expect looking at our data over the past three years, let's say. And then there are very eight standard variations right from that. So let's just say if you're zero to one from it, that's a green, if you're two plus, maybe that two to four, that's an amber, if you're five plus, that's a red, I'm making it up. But you get the gist, right? And that way, it accounts for both those sites that are quiet and those sites that are really noisy, these are indicators as we say, there's no reason to get your back up against it. It could be a red site is perfectly okay. And naturally, it was because they had a, you know, a bright red on the Speak Up score, but they had zero raised, which triggered that. That red, yes. But in fact, there really is nothing of concern going on. They're fine. But at least we had the conversation at least, you know, we have a way to kind of keep that finger on the pulse. Yeah.

**Jonathan** 40:25

I think that's really smart. Because you've got limited, everyone has got sort of finite resources and capacity and time. So knowing where to look in such a complex, large organisation that gives you that that sense of focus, I guess?

**Jonathan** 43:45

Indeed.

**Katie** 43:46

Really smart. Yeah. So Jonathan, the question I can't help thinking, but I ought to ask you out of sheer curiosity. You told me about the huge number of the 1000s of people that work for JM, we've talked about the multiple sites that they operate in, you've talked about people at all different levels needing to understand the importance of an ethical culture, the importance of both accountability and speaking up. Given all that and given all that complexity, and given especially that there is much that you can't really know, you talked about pulling on this thread and not knowing exactly what's at the end of it. I can't help asking how do you actually sleep at night?

**Jonathan** 44:40

Depends on how much water I've had to drink is the honest answer. Yeah. It can be challenging at times. I would say the thing that worries me the most is what don't I know?

**Katie** 44:59

Yes. Yes.

**Jonathan** 45:01

And am I, are we getting through to the 12,500 folks? So I would say, that's what I grapple with quite often. You get an answer to an extent but it takes time, right? You don't get that immediate feedback. So are you getting the response? Are you getting the energy back from the organisation? Are the issues arising that you would expect? Are you having the difficult conversations that you need? But of course, you don't get that answer the next day. No. So that's the challenge, I'd say.

**Katie** 45:46

Just again, out of curiosity, do you do scenario planning? So do you imagine something going wrong? And how you might need to respond; what the options are? Do you actually sort of do that?

**Jonathan** 45:59

We do. So we have a crisis management group, but we kind of have a, at least a a way of working in place, right, so that you're not reinventing it each time. Of course, if there are specific matters that we're dealing with, we have a plan in place for that. But I am a believer that you can only plan so much. And there are certain core components, there are certain basics that I could tell you right now need to be included within that, there are some basic questions, there are some obvious stakeholder management groups, you know, that you'll need to be reaching out to. But these things are tricky by nature, in part because they are so dynamic because they are new or different, or the first time you're seeing it exactly in this way, or... you do need to be able to flex.

**Katie** 46:59

And before we head over to those quickfire questions, I guess the other thing that might be interesting to get your view on is when you talking about the sort of internal heat map, but if we were thinking about a global external heat map, in terms of where are the next likely risks, issues going to be? When are they going to be geopolitical? Are they going to be environmental? Are they going to be political, potentially or social? Have you got a sense of that? Or do you think actually, no, you've got to just simply cover all bases, you can't second guess that kind of thing?

**Jonathan** 47:32

No, I mean, you have to be able to prioritise. You can't treat all risks the same. Whether we're right or not, time will tell. But I firmly believe all arrows are pointing in the direction of geopolitical, lifted over the past couple of years, and it ain't gonna get easier, I'll tell you that it's gonna get harder before it gets any easier or simpler. So just think about right now, the West, and China. And you know, what's taking place there, and different countries, different parts of the world looking to reshape the world order. And where you see that playing out is in the export controls and sanctions space, most specifically, which is being used as a foreign policy tool by governments. Now, that is how they're conducting foreign policy in 2023. Right? So you restrict certain technologies, because you don't want your competitor to receive the benefits of it, or you worry about it potentially being weaponized. Right? Or you worry about its economy gaining steam and overtaking yours, or depending upon, you know, where you're sitting, Russia and Ukraine continues to play out. That's a big



question mark, right? As to how that impacts the world order. You've got the likes of Iran, you've got India, you've got all right. I mean, this is a minefield out there. I don't know how it's going to end up. So don't ask me that. It absolutely is top risk, from my perspective.

**Katie** 49:22

And I'm guessing even if listeners operate in just their domestic home market, it's unlikely they're not going to have some kind of connection with a territory outside of it in some way or another. Even if it's just their supply chain, I'm guessing?

**Jonathan** 49:39

Exactly. That's right. I mean, yeah. This is the world we live in, as we were talking about. It is global in nature. Pull that thread, there's going to be a link to other parts of the world. We don't even have to imagine, we we've seen a play out with the chip shortage, right? Yes. Yeah, that's a prime example of it. That impacted the world over.

**Katie** 50:07

Yeah, we are all connected. Yes, yes. Let's head over to those quick fire questions. If you've got time for them

**Jonathan** 50:16

I've tried to procrastinate and put you off for as long as I can. But my time has come, I say...

**Katie** 50:23

Your time has come. What traits or characteristic Do you possess that, above all others has most led to your career success, do you think?

**Jonathan** 50:34

Courage and conviction are really important for me, in this area, to be bold. People aren't always going to love what I have to say. But it's important that they hear it. And frequently, it won't be that first or second conversation, but by the third conversation, they'll say, you know, I'm actually... thank you. I needed to know that, right? I needed to hear those terms.

**Katie** 51:03

So there's an element of persistence as well.

**Jonathan** 51:06

there is, and that's a tricky part. How hard do you push, when? Right? I will, if I believe in something, and I believe that they, someone needs to know about it. And I'm not getting a bite on the first go. I will make sure that the message gets across, but it's how do you do that? How do you pitch it in a way that they're going to receive it? Because like we were talking about with communications, just you saying it with no recipient or willing listener on the other end is kind of meaningless. I mean, I want to achieve results here. I want to get to an outcome. So how am I best going to position this so it achieves the outcome we desire?

**Katie** 51:57

Exactly. The outcome being some kind of understanding that leads to a certain behaviour having influence, is it? Is it that quote from George Bernard Shaw, who said, 'The problem with communication is the illusion it's taken place' How often does that happen? We think we've communicated! Yeah, yeah. Can't help asking you just one follow up to that, because we talked about how you started as an attorney and now obviously, in house in a large, complex global organisation. Has that journey been what you imagined? Has it delivered what you were hoping for when you made that switch into the into a different world?

**Jonathan 52:39**

I'll start with the latter. Has it delivered? Yes. And exceeded. Was it what I imagined? No.

**Jonathan 52:48**

I'm not sure what I imagined. Listen, I made the change from private practice to in house for a few reasons. One was, as I say, I'd gotten a lot of really good experience early on, I was fortunate in that respect, you can always learn more, but I was ready for a new challenge. I also wanted to be a part of the business frankly, and feel like I was supporting a common purpose. I am a purpose driven person. That's a lot of p's. And Johnson Matthey's purpose totally resonates with me, right? Cleaner, healthier world for today and future generations, we are in the clean energy space, the world needs us.

**Jonathan 53:36**

A quick pitch if you don't know who we are, please check us out. We are really cool. The world does need us. And in private practice it was often you're representing these folks or advising, counselling them on a one-off basis hopefully, if you're doing your job well these aren't recurring clients. But then you only get to know them so much and influence so much and help so much. So that that is part of why I wanted to make a change, as well as being more proactive frankly, and less reactive and "Listen, a problem has arisen, you outside, counsel, help us sort out this mess." I wanted to do more kind of prevention, right? Early identification and address it from that. And but I didn't know everything that came along with this nor would you until your bum is in the seat. Right? It has exceeded, because actually what I have found over time, Katie, is actually what drives me and where I get my energy from is less about the subject matter. Yes, it's interesting and there are some grey area things as we've talked about and ethical dilemmas and you're absolutely a critical part of the organisation's foundation, but it's actually the people management, the leadership component to it that I enjoy the most now, and I have the most fun with, so has exceeded in that realm because I'm having the most fun I ever have, frankly.

**Katie 55:16**

If you have to recommend one book to those who work in the field of ethics, compliance or communication for that matter, or just wanted to learn more about those subjects, is there one book you'd recommend?

**Jonathan 55:28**

I'm going to actually not answer your question and just give a book that I'm going to recommend that may or may not have anything to do with ethics and compliance. The Boy



the Mole the Fox and the Horse, I don't know if you, yes, it is something that a mentor of mine gave me a few years ago. And it's something that I quite enjoy. And the reason why I'm suggesting it's one, it's simple, right. And that keeps with my message of keep it simple. There are some lessons in there, which you could construe as being related to this space. But that's not really what it's all about. And I think it's important to have interests outside of your day to day. So that's why I'm pointing to that one. It's important. We talk about mental well being and mental health and all this stuff, you need to just be able to step back, right from the day job at times. And yes, you can pursue that interests, you know, at various points, but just to let your mind wander, that that generates creativity, right? It plant seeds, and you don't even realise until exactly until you come back around it a month or two later. And you can connect the dots and say, Where in the world that I come up with that fabulous idea. Oh, right. It had nothing to do with what I was reading, you know, for the day job. It was completely unrelated. So just being as well rounded, well informed, right? Curious as a person as you can be, I think is all for the good.

**Katie** 57:08

Excellent. We will put a link to in the show notes. The Boy the Mole The Fox and the Horse by Charlie McKinsey McKinsey, I think. Yes. Yes. Excellent. Excellent. So how would you complete this statement? World class cultures are:

**Jonathan** 57:26

Contagious.

**Katie** 57:28

oh, I love that. That's fantastic.

**Jonathan** 57:32

And I mean that in a energising sort of way, you get this thing, right. It becomes part of your DNA, you see that showing up in all kinds of ways that you couldn't imagine. And that's the beauty of culture as more broadly, not even just ethical culture, when you land that it does have that contagion effect.

**Katie** 57:58

Yeah, I love it. And finally, we get to give you a billboard for millions to see, a metaphorical billboard if you like. And you can put on that billboard, any message you like.

**Jonathan** 58:11

Am I paying for it?

**Katie** 58:13

And it's free. It's free. We're going to design, build it for you, put it out there. Absolutely. It's free.

**Jonathan** 58:18



I love your I love your design capabilities. What am I putting on it, what's the question? Yeah?

**Katie** 58:25

Yeah. What's the message?

**Jonathan** 58:28

Be brave. Be vulnerable. Be you.

**Katie** 58:33

You just don't get better advice than that. Jonathan, this has been a delight this conversation. Thank you so much for your time.

**Jonathan** 58:41

My pleasure. Thank you, Katie.

**Katie** 58:46

So that is a wrap for another episode of the Internal Comms Podcast. For the show notes and the full transcript, head over to AB's website. That's [abcomm.co.uk/podcasts](http://abcomm.co.uk/podcasts). And it's there that you will find our entire back catalogue of more than 80 episodes. If you did find this episode helpful, I would be very grateful if you could give the algorithms a little nudge simply by rating the show on Apple Podcasts. That will help other IC pros out there, find our show.

**Katie** 59:25

My thanks to Jonathan, my producer, John Phillips, sound engineer Stuart Rolls and the fabulous team at AB who keep the show on the road. And finally, my thanks to you for choosing the Internal Comms Podcast. Please reach out to me anytime on LinkedIn or Twitter. I love getting feedback from you and I genuinely do want this show to be as helpful as possible to you. So until we meet again, lovely listeners, stay safe and well and remember, it's what's inside that counts.

**Katie** 1:00:02

This episode of the Internal Comms Podcast was brought to you by my very own Friday Update. Would you like to get a short email from me, never more than five bullet points long, giving you my take on the week's news from across the world of communication? This might be the latest reports, books, podcasts, conferences and campaigns that have caught my eye during the week. I always limit myself to just five nuggets of news. So you can read it in record time, but still feel a little bit more informed, hopefully a little bit more uplifted as you end your week. Now, this is a subscriber only email, which was initially intended just for colleagues and clients. I don't post this content anywhere else. So you do need to sign up. But that is super easy. Simply go to [abcomm.co.uk/Friday](http://abcomm.co.uk/Friday), and you just need to pop in your email address. It is equally easy to unsubscribe at any time. So give it a whirl, that sign up page again, [abcomm.co.uk](http://abcomm.co.uk) forward slash Friday. And if you do choose to be a subscriber, I look forward to being in touch.