



Bumble Bee Seafoods Shores Up Ethical Culture with NAVEX Global's Software Ecosystem

"Compliance is becoming more and more of our DNA. It pays to have an ethical culture."

Jeff Killeen
Chief Compliance Officer



Solution

COMPREHENSIVE COMPLIANCE MANAGEMENT



Highlights



INDUSTRY
Food



NUMBER OF EMPLOYEES
1,500



BEFORE
Company needed an E&C program that would resonate globally and address industry risks.



AFTER
NAVEX Global's software ecosystem provides platform for promoting an ethical culture.

Hotline & Incident Management Software

Capture and investigate ethics & compliance reports from across your organization in a centralized database. Collect issues through our world class hotline services, web intake forms, face-to-face conversations and concerns raised through questionnaires from our [PolicyTech® management system](#). We help you document all reports and case management assignments while streamlining workflows to ensure each report is addressed—and risks are managed.

Challenge: Charting a New Course

When Jeff Killeen stepped into the role of the first Chief Compliance Officer at Bumble Bee Seafoods, he had a tall order in ahead of him: consolidate and place as many compliance functions as possible under one roof.

The largest branded shelf-stable seafood company in North America, Bumble Bee has more than 1,500 employees and operations spread out from its headquarters in San Diego to fish suppliers in Southeast Asia. Killeen needed to formalize the company's ethics and compliance program to address Bumble Bee's specific industry complexities, resonate across the company's global operations, use resources conservatively and wisely, and most importantly, help the company maintain a culture that supported business values as well as objectives.

Solution: NAVEX Global's Ethics & Compliance Ecosystem

To meet those challenges head on, Bumble Bee turned to NAVEX Global's integrated suite of [ethics and compliance software](#). This enabled the company to connect data and insights from across the enterprise to proactively address risk areas and harness the competitive advantage of compliance.

EthicsPoint® Hotline & Incident Management

[EthicsPoint](#) hotline and incident management software provided the foundation for Bumble Bee's compliance program, giving the organization increased visibility into its unique issues and risk areas. Having used the software at a previous organization, Killeen was familiar with the solution's grounding properties. "It's an excellent program that serves as a base for a number of things," said Killeen.

EthicsPoint documents and tracks incident reports that come from Bumble Bee's hotline as well as its extended reporting channels. Killeen now has the ability to document open-door reports that come directly to him, ensuring that all reports are addressed and that risks are managed.

This was Bumble Bee's first step toward using automated software to move the needle on corporate culture. "It pushes for a better culture, because you have a way to report that is not just going to your manager, because your manager might be a part of the problem and not a part of the solution. You have to have that component in there to drive a culture."



Enterprise Due Diligence

Protect your organization from third party risk with continuous due diligence. RiskRate is an affordable, automated platform that performs around-the-clock, automated third party risk monitoring – the industry standard for effective due diligence. Define and score your organization profile risk and corresponding third party risk factors, and pursue your risk mitigation efforts where they are most needed and effective.



Online Ethics & Compliance Training

Strengthen your organizational culture, meet legal requirements and inspire behavior change by deploying our award-winning online ethics and compliance training. Our robust library of courses set the industry standard for quality. Our content is updated regularly to ensure that the latest relevant topics are addressed and you can be sure your employees are up to date.

RiskRate® Enterprise Due Diligence

Once EthicsPoint was implemented, Killeen turned his attention to extending Bumble Bee’s compliance efforts to its entire supply chain by establishing an effective due diligence program. A number of the locations where Bumble Bee sources its fish rank high on the Transparency International (TI) Corruption Perceptions Index (CPI), highlighting the need for increased vetting and monitoring of third parties in those areas. Keeping the program within the NAVEX Global ecosystem, Bumble Bee selected [RiskRate](#) to help them gain visibility into their perceived risks and apply the appropriate levels of due diligence to each third party.

Through the automated software, Killeen develops and distributes questionnaires based on where the company’s foreseen risks are. For example, Bumble Bee uses custom forms to vet welfare issues in foreign countries and perform quality assurance checks for anyone who supplies fish to ensure that they are in compliance with FDA regulations. Using RiskRate “we’re able to adequately address our business conduct concerns for people within the United States and outside,” said Killeen.

In addition, as a RiskRate client, Bumble Bee has access to NAVEX Global’s partnership with Pacific Strategies and Assessments (PSA), a global leader in analyst-led due diligence. When needed, Killeen is able to request further due diligence on an automated report produced by RiskRate, giving him a more in-depth review of potential third-party risks.

NAVEXEngage® Ethics & Compliance Training

Following the deployment of RiskRate, Killeen next set to tackling organization-wide training. At first, he was hosting training on his own, traveling to Bumble Bee’s global operating sites to deliver training in person. This soon became unmanageable. “It’s a lot of work to have to fly internationally, prepare, and then overcome language and cultural barriers in each location,” he said.

He once again turned to NAVEX Global to help automate and deliver a solution that can be customized to specific risk areas that require more training and cultural considerations. Currently, Bumble Bee distributes four major training programs through the [NAVEXEngage](#) online training platform: [basic bribery](#), [advanced anti-bribery](#), [antitrust](#) and [conflicts of interest](#). That training will be augmented as the company’s risk needs dictate.

Killeen bolsters training with weekly flash learning emails that include a wide range of compliance topics that are relevant to the company. An archive of the emails is stored on the company’s intranet, the Fishbowl.

Policy & Procedure Management

Centralize, simplify and strengthen your policy management lifecycle with PolicyTech. Automating this foundational process of your E&C program reduces legal risk while increasing productivity, accessibility and accuracy of your policies. Our mobile-friendly design and powerful search and browse capabilities make it easy to access relevant policies and procedures in any location.

PolicyTech® Policy & Procedure Management

The final piece of Bumble Bee's ethics and compliance ecosystem is [PolicyTech](#) policy and procedure management software, which augments all of the other compliance components in place at the company.

Killeen developed and drafted several policies including a new corporate code of conduct and codes for both suppliers and drayage. With 1,500 employees and a myriad of vendors dispersed throughout the globe, PolicyTech has allowed Killeen to effectively distribute policies, collect attestations, and confirm his entire organization is aligned with the latest regulations.

Furthermore, the policies are used throughout the year in conjunction with NAVEXEngage online training. This ensures standards in company policies and procedures are reinforced with tailored scenario-based compliance training.

Results: Catching an Ethical Culture

As a team of one, keeping each piece of ethics and compliance software within the NAVEX Global ecosystem has provided big resource savings for Killeen. "It's one-stop shopping. If you get into EthicsPoint and navigate around a while, you're familiar with it. And whatever you do in EthicsPoint is kind of similar to what you do in RiskRate, which is similar to what you do in PolicyTech. They all follow the same basic navigability format, which is easy for me as a single practitioner. I don't have to take resources away from the business. And really, I can keep my costs down and my expenses down and get a lot of value out of that to become the best compliance program we could possibly be with pretty much minimal resourcing."

The ultimate goal for Bumble Bee, however, is to achieve a standout culture. "In order for us to go forward as a company and make sure everything is good, we have to have a proper ethical culture," Killeen noted. "A lot of the stuff that we're doing is aiming at elevating our culture to be the best that we can possibly be so we are known as a company that deals with others honestly. All of those [software] pieces are a part of the compliance pie, and they have to be there to drive a meaningful compliance program."

To highlight the company's commitment to living in an ethical culture, Killeen established an excellence in compliance awards program. Nominations are gathered by managers and then sent on to a committee that includes the vice president of human resources, the general counsel and Killeen. The program honors employees who have demonstrated their understanding of and obligation to Bumble Bee's core values, and provides another avenue for Killeen to promote the company's ethics and compliance program. "Compliance is becoming more and more of our DNA. It pays to have an ethical culture."

Comprehensive Compliance Management

Fully integrate compliance management software for better accessibility, communication and change management. NAVEX Global's compliance management system consolidates your entire GRC program onto a scalable cloud-based platform, enabling you to confidently anticipate and navigate global regulatory compliance.

Gain Insight

Integrated GRC software allows you to connect data and insights from across your company so you know what's happening at all times.

Greater Visibility

Many NAVEX Global customers start with just one pressing demand, such as policy management, then expand into our other compliance management software to leverage data and information-sharing capabilities.

Contain Risks

Contain compliance risks related to the constant stream of new threats, laws and regulations your organization must address each day with agile risk management software.

About Bumble Bee Seafoods

Bumble Bee Seafoods was founded in 1899 by a handful of dedicated fishermen. Today, privately held and headquartered in the United States, Bumble Bee Seafoods is North America's largest branded shelf-stable seafood company, offering a full line of canned and pouched tuna, salmon, sardines, and specialty seafood products marketed in the U.S. under leading brands including Bumble Bee®, Brunswick®, Sweet Sue®, Snow's®, Beach Cliff®, Wild Selections®, Bumble Bee SuperFresh®, and in Canada under the Clover Leaf® brand. The Bumble Bee® brand has established significant consumer awareness and loyalty based on the quality, nutritional value, and affordability of its products.

ABOUT NAVEX GLOBAL

NAVEX Global's comprehensive suite of ethics and compliance software, content and services helps organizations protect their people, reputation and bottom line. Trusted by 95 of the FORTUNE 100 and more than 12,500 clients, our solutions are informed by the largest ethics and compliance community in the world.