

Example Nomination

Company description

Superior Sparkles is the world's leading manufacturer of glitter. Superior Sparkles has worldwide distribution of glitter and uses the most advanced technology to create eco-friendly and biodegradable glitter products. Our mission is to make the world sparkle by providing top-quality products at an affordable price. Superior Sparkles is a Fortune 500 company with annual revenue of \$15 billion, operations in over 10 countries and a global workforce of more than 15,000. We are proud to have been recognized by the Ethisphere Institute as one of the World's Most Ethical Companies every year since 2008.

Program Overview

Our Ethics and Compliance program is supported by Global Chief Ethics & Compliance Officer and a network of Ethics Advocates. It helps employees follow the spirit of our code of conduct and foster an ethical, sustainable, and inclusive culture where we can all sparkle. It empowers people to speak up confidently and without fear of retaliation.

We provide multiple mechanisms to encourage people to report misconduct allegations, including Ethicspoint. Code of Conduct and PolicyTech ensure policies and resources are accessible. We've added RiskRate in response to the growing need to monitor third-party suppliers. Our program has grown since the glitter industry became more regulated and we grew through acquisition, making us the leading global manufacturer.

Business challenges

Prior to engaging with NAVEX, we used a spreadsheet to manage ethics investigations. Our hotline was not integrated with our case management solution, meaning hotline calls were manually assigned for investigation. After assignment, matters were manually entered into the spreadsheet by our investigators.

As a company with global operations - we didn't shine in this area and needed a more comprehensive solution. Investigations and follow-up were not done consistently, so we were failing to capture and track all matters, and case details were sometimes lost. We also had no central place to capture and document root cause analysis to facilitate corrective and protective actions. Reporting and metrics were difficult to capture which made it harder to manage and analyze trends or to identify red flags for retaliation. Further, with global suppliers that supply our glitter manufacturing materials, we need to ensure they uphold our supplier code of conduct and values.

Our solution and how it leveraged NAVEX products

Our expanding footprint and rapid population increase required us to find a global, centralized solution. Utilizing NAVEX's hotline and incident management solutions enabled us to centrally manage all matters rather than addressing helpline calls and internal contacts separately. From a whistleblower perspective, the NAVEX EthicsPoint solution provides employees a readily accessible, consistent route for reporting issues, and offers various methods to report (phone/web), anonymously if they prefer. We now have local telephone numbers and employees are able to speak to a person in their native language 24/7 across all time zones.

Having a centralized, secure case management platform and consistent collection of data allows us to better triage and categorize cases, streamlining assignment, investigation, analysis and remediation of misconduct. Adding the PolicyTech and Code of Conduct solution allowed us to consistently communicate our values and policies across our global network of glitter enthusiasts, ensuring our values are communicated and consistently upheld.

We also track progress and monitor types of cases, outcomes and trends. This allows us to have a more prevention-oriented program and informs our global risk assessment, communications and training strategies and helps support a cycle of continuous improvement for our Ethics & Compliance program. This helps us ensure a robust, effective and reliable response to internal reporting and policy and procedure distribution and attestation.

Using RiskRate, we're able to ensure that our suppliers also uphold our values and manufacture our raw materials in an ethical and responsible way. RiskRate helps us ensure that our third-parties are not at risk of damaging the reputation of Superior Sparkles.

Results and key metrics

Using NAVEX for hotline intake, case management and policy management improved our internal reporting to our board of directors and C-suite to help them understand the importance of a "listen up" culture. NAVEX's solutions allowed us to maintain consistent case management and reporting as our global presence grew when we acquired Global Glitter Manufacturers. Using our hotline and incident management data, we're able to provide detailed analysis of our hotline reports and associated follow up.

We use NAVEX benchmarks in our reporting and track our metrics year over year. This data analysis helps identify any trends that can inform our risk assessment and training programs. We also align our incident categories to those used by NAVEX in the Hotline & Incident Management Benchmark Report published annually, which allows us to track our program against industry benchmarks. The tools, analysis and reporting help demonstrate the effectiveness of our program, which is now required by various whistleblower regulations globally in the highly regulated glitter industry. The fact that it is an independent solution gives whistleblowers assurance they can raise a concern anonymously.

Tip: Provide quantitative, and qualitative data when possible.

Moving away from manual and disjointed processes enabled us to investigate and close cases 23% faster. Today we're able to report on more than before, and have seen a 7% increase in our substantiation rate. Our enhanced reporting paired with insights from PolicyTech's attestation provide us with the data we need to analyze our own reporting trends, which we use to inform training, messaging strategy, and messaging from the top so that we may improve completion rates, instill trust in reporting, and cultivate a healthy workplace culture for employees.

How we plan to maintain this success and improvement in the future

Given the strength of our industry-leading program, we also published an external whistleblowing and non-retaliation policy to promote the hotline and protections offered to people who speak up. We also regularly conduct program reviews with NAVEX and are implementing suggested changes to strengthen our program and make the platform more user-friendly for reporters and case managers while also improving the data quality.

We are looking to strengthen case management processes to proactively identify any retaliation against reporters, including follow-up after case closure. We are also taking steps to identify root causes to inform our risk analysis, training program and policies.

We plan to continue using RiskRate for ongoing monitoring of our existing suppliers and during the onboarding process of new suppliers. This is an integral part of our overall ethics and compliance program so we can stand by our product throughout the entire lifecycle.

Our Code of Conduct helps us emphasize the role of managers in creating a listen up culture and help our people to understand the importance of speaking up, and with our growth we are reviewing and updating to make sure it meets our growing needs. Having a robust and effective internal investigation and reporting process, code of conduct and policy management system is an indispensable component of our Ethics and Compliance program, which underpins our culture to create a workplace where everyone can thrive.

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