

TEXTRON

Culture of Compliance Initiative Textron Compliance Programm

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28. April 2006
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Wissenschaft an der
Ruhr- Universität Bochum**

Agenda

- **Warum gibt es eine Culture of Compliance Initiative bei Textron?**
- **Was bedeutet 'Culture of Compliance'.**
- **Kautex's Culture of Compliance Action Plan.**
- **Überblick über das Textron Compliance Programm.**
- **Fragen und Antworten.**

Textron: Always Strong on Values



Royal Little
Founder of Textron Inc.
in 1923 & Retiring as
Chairman of the Board
in 1960



G. William Miller
Chief Executive Officer
and Chairman of the
Board, Textron Inc., 1974
to 1978
U.S. Secretary of
Treasury
1979 - 1981



Lewis B. Campbell, Chief
Executive Officer and
Chairman of the Board
Textron Inc.
1998 to Present

Kautex: Immer starke Werte

Reinold Hagen
– der Sprung
in die
Selbständigkeit.



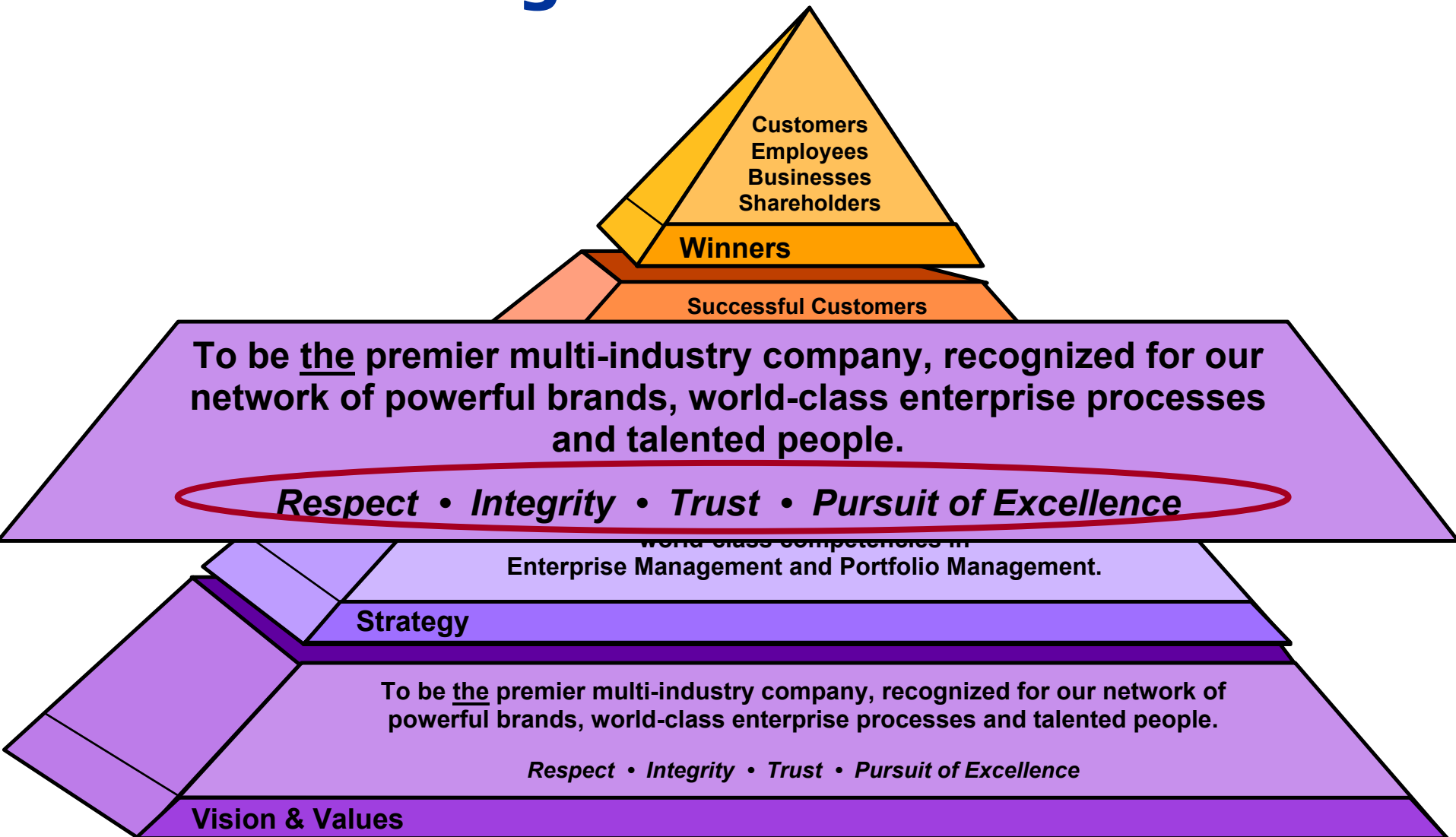
Textron Kern - Werte

- **Integrität**
- **Respekt**
- **Vertrauen**

Grundpfeiler der Beziehungen zu Kunden, Mitarbeitern, Zulieferern, Aktionären, der Gemeinschaft, in der wir leben und unserer Umwelt.

Auszug aus den Textron "Verhaltensrichtlinien im Geschäftsverkehr"

Transforming Textron



Was ist Kultur?

- **“Die gesamten Muster menschlichen Verhaltens und deren Resultate, die in Gedanken, Sprache, Handlungen und in menschlicher Schöpfung ihren Ausdruck finden.”**

Webster's Drittes Internationales ungekürztes Wörterbuch

Was ist Compliance?

Oxford English Dictionary:

- **“... sich den Regeln und Standards entsprechend zu verhalten”**

Was ist Compliance bei Textron?

- **“... in Übereinstimmung mit den Verhaltensrichtlinien im Geschäftsverkehr zu handeln.”**

Was heißt Culture of Compliance ?

- ✓ **Entsprechend der Spezifikation fertigen.**
- ✓ **Liefern, was den Kunden versprochen wurde.**
- ✓ **Notwendige Tests durchführen.**
- ✓ **Unternehmensgrundsätze und Verfahren beachten.**
- ✓ **Gesetze und Regeln einhalten.**

Verpflichtet, das Richtige zu tun.

2005 OBJECTIVES KAUTEX (L. ROSENKRANZ)

ENTERPRISE OBJECTIVES	SUCCESSFUL CUSTOMERS	TALENTED PEOPLE	WORLD-CLASS ENTERPRISE PROCESSES	INDUSTRY-LEADING PERFORMANCE
IMPROVEMENT PRIORITIES	<p>Develop and Implement Customer Revenue Growth Strategy:</p> <ul style="list-style-type: none"> Support 2007 organic growth target by achieving order volume (annual sales) according to plan for: <ul style="list-style-type: none"> sustaining business "new" business Implement and improve customer leadership processes to support growth targets through: <ul style="list-style-type: none"> Segmentation Customer Satisfaction & Loyalty Customer partnering programs Achieve incremental Value Pricing NOP target Increase Kautex Marketing Organization Effectiveness rating by 50% AOP (75% Stretch) by deploying marketing & sales talent development process and resources by 12/31 Increase Kautex efforts to standardize products and processes to achieve xx% of standardization in each new project Strengthen global R&D organization effectiveness by focusing on customer needs especially in new markets Increase Customer Satisfaction and Loyalty Index to 76% AOP (60% Stretch) by 12/31 Develop GDP Strategy ppm rates to 40/20/10 2005/2006/2007 	<p>Accelerate Talent Development Process:</p> <ul style="list-style-type: none"> Fully utilize available enterprise talent/leadership development programs including e-learning from 3 to 5 AOP (6 Stretch) by 12/31 80% AOP (100% Stretch) completion of TSS/Lean, ISC, Sales and Finance skills assessment based on Kautex Qualification profile-matrix by 9/05 Continue to support improvement of Inclusive Workforce and achieve KPI of 27% (30% Stretch) by 12/05 Participate in the achievement of the Enterprise Inclusive Workforce objective to increase non-majority national origin, female and minority representation in leadership positions 	<p>Accelerate TSS Lean Development:</p> <ul style="list-style-type: none"> Achieve a 75-day AOP (60-day Stretch) closure rate for Lean projects across Kautex Execute 30 AOP (45 Stretch) lean Kaizen projects Improve utilization of Business Assessment Process III events to 1 AOP (2 Stretch) per month by 9/30 Execute TSS Lean training process - increasing Lean Green Belts from 0 to 40 AOP (60 Stretch) by 12/31 Achieve TSS cost reductions targets including planned lean hard savings <p>Execute ISC Strategy:</p> <ul style="list-style-type: none"> Achieve Material Cost Reduction target Achieve Manufacturing Cost Reduction by 12/31 <p>Achieve World Class Safety Record:</p> <ul style="list-style-type: none"> Establish proactive safety culture in all plants to meet Health & Safety targets <p>Improve</p>	<ul style="list-style-type: none"> Meet or exceed 2005 AOP financial targets and achieve targets for Working Capital Excellence (strive for GDP-targets) Achieve AOP Net Cost Reduction target Reduce Invested Capital by improving Operating Working Capital per plan Improve Cash Flow Forecast Accuracy, i.e., Variance btw. Actual and Forecast for previous month starting August 2005 Improve inventory turns per plan over '04 baseline Limit Customer give-backs to target level over prior year
PERFORMANCE GOALS	<p>Key Performance Indicators</p> <ul style="list-style-type: none"> Customer Satisfaction Loyalty Index Sustaining Business New Business PPM 	<p>Key Performance Indicators</p> <ul style="list-style-type: none"> Inclusive Workforce 	<p>Key Performance Indicators</p> <ul style="list-style-type: none"> Lot Time Injury Rate < 1.2 Lot Time Injury Rate < 0.3 OOE > 82% 	<p>FINANCIALS</p> <ul style="list-style-type: none"> ROIC ROIC Income Economic Value Added

Entwicklung von Aktionsplänen bis zum 31.03, um die Culture of Compliance zu verbessern und 100% Ausführung jeden Aktionsplans bis zu 31.12.

Gibt es eine Culture of Compliance bei Kautex?

'Beurteilung der Verhaltensmuster'

- **Bestandteil des PMP der Führungskräfte ?**
- **Tagesordnungspunkt bei Geschäftsmeetings? MGOR, GLMs, Abteilungsmeetings?**
- **Gate Reviews für NPSI/TSS?**
- **Compliance Trainings?**
- **Verfügbarkeit von Compliance Tools?**
- **Verkörpert das Kautex Management Compliance in seinen täglichen Handlungen und Stellungnahmen?**

Zusammenfassend...

- **Textron Culture of Compliance Initiative wurde entwickelt um**
 - **Sicherzustellen, dass jeder versteht, dass Textron immer das “Richtige” tun möchte.**
 - **Sicherzustellen, dass jeder versteht, was das “Richtige” ist.**
 - **Zu zeigen, wo jede/r Mitarbeiter/in Hilfe bekommen kann, um das “Richtige” zu tun.**

Kurzzeitiger Vorteil ist keinen langfristigen Nachteil wert!

- ✓ **Gefängnisstrafen und Bußgelder...**
 - ✓ **Schaden an unseren Marken – Business Unit und Textron.**
 - ✓ **Beschmutzung unsers Namens in den Augen unserer Kunden.**
 - ✓ **Verlust der Glaubwürdigkeit bei Investoren.**

Erwartungen:

Auffassung

**Mache Profit, und
frage nicht, mit
welchen Mitteln**



Wirklichkeit

**Erreiche Dein
Ziel, ohne
Gesetze und
Regeln zu
brechen**

Jede Verletzung ist eine zuviel!

Verhalten bei potentiellen Compliance Fällen:

- **Nachfragen, dann handeln.**
- **Berichten Sie Verletzungen an Ihren Vorgesetzten.**
- **Andere Ansprechpartner**
 - **VP Finanz**
 - **Compliance Officer**
 - **Sr. Compliance Officer**

Textron HelpLine
1-800-892-9871
(toll free in US and Canada)
1-401-457-6006
(toll call)

Egal, wie Sie berichten, tun Sie es!

TEXTRON

Textron's Compliance Programm

TEXTRON COMPLIANCE PROGRAMM

- **3 Elemente:**
- **Prävention**
- **Feststellung**
- **Korrektur**

Prävention:

- **Verhaltensrichtlinien im Geschäftsverkehr**
- **EH&S Handbuch**
- **Textron Finanz - Handbuch**
- **BU Compliance Pläne**
- **Trainings /CRC**



Ausbildung/
Training

Compliance Resource Center - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Back Forward Stop Home Search Favorites Media Mail Print Fax New Folder Links



Search the Web Search Address https://textron-lcec.lrn.com/app/enroll/te Go Links

Admin Tools | Virtual Report Card | User Profile | Logout

Compliance Resource Center

Based upon the results of your completed questionnaire, Textron recommends the following modules. Due to your position, location, or assignment, your Business Unit may have designated specific modules as mandatory. Should you have any questions regarding what modules are required, please contact your Human Resources representative or Compliance Officer.

The list of modules is located below. To begin, click the module of your choice. The modules present a Tutorial, a Handbook, FAQs (Frequently Asked Questions), a listing of the Top Ten points covered by the module and the applicable Policies.

If you are an hourly or salaried, nonexempt employee (i.e., eligible for premium pay for overtime worked) and are attempting to access the Compliance Resource Center at a time outside your normal work schedule, you must obtain prior management approval before proceeding.

Located at the bottom of the page are two buttons, "View All Modules" and "Redo Questionnaire." Clicking "View All Modules" displays all available courses, including those displayed using the Training Needs Analysis questionnaire. Clicking "Redo Questionnaire" re-displays the questionnaire with the same questions and answers as the previous session.

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Compliance Resource Center - Microsoft Internet Explorer

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Back Forward Stop Home Search Favorites Media Print Mail News RSS Feeds

Search the Web Search Address <https://textron-lcec.lrn.com/app/enroll/te> Go Links

Analysis questionnaire. Clicking "Redo Questionnaire" re-displays the questionnaire with the current settings to allow you to make changes to your training needs.

Module List	Quiz Guides	Description
<input type="radio"/> 知的財産の概要	IPY250-a50jaJP	
<input type="radio"/> 知识产权概述	IPY250-a50zhCN	
<input type="radio"/> Age Discrimination: Avoidance and Prevention	HUR248_2A	
<input type="radio"/> Americans with Disabilities Act: Introduction	HUR220-a50en	
<input type="radio"/> Americans with Disabilities Act: Reasonable Accommodation	HUR223_2A	
<input type="radio"/> Antiboycott: How to Handle Boycott Requests	DBA221_2A	
<input checked="" type="radio"/> Antitrust: Overview	CMP300_2A	
<input type="radio"/> Attorney-Client Privilege	COM221_2A	
<input type="radio"/> Basic Labor Charging	DEF225-a50en	
<input type="radio"/> Bedeutung des Foreign Corrupt Practices Act	DBA216de_2A	
<input type="radio"/> Bewusste Kommunikation	COM206-a50deDE	

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Feststellung:

- **Helplines/Hotlines**
- **Audits**
 - **Self Assessments**
 - **Textron Internal Audit Services**
 - **Externe Audits bei Bedarf durch Rechtsanwälte oder Buchprüfer**
- **Annual Report of Compliance (ARC)**

SCREEN SHOT OF CRC – ANNUAL REPORT MODULE



Korrektur:

- **Action Plans wenn Probleme festgestellt wurden**
- **Disziplinarmaßnahmen**
 - **Verwarnung**
 - **Suspendierung**
 - **Kündigung.**
- **Berichte an entsprechende Behörden.**
- **Einleitung rechtlicher Schritte.**
- **Kommunikation der besten Alternativhandlung.**

Verantwortlichkeit für COMPLIANCE

- **Primär: Jeder einzelne Mitarbeiter / Plant Management / Kautex Senior Management**
- **Aufsicht: Textron Corporate Office**
- **General-Verantwortung: Textron Board of Directors**

Zusammenfassung

- **Textron's Culture of Compliance Initiative**
 - **Wir leben die Culture of Compliance.**
- **Textron's Compliance Program**
 - **Prävention / Training**
 - **Feststellung**
 - **Korrektur.**
- **Compliance ist jedermanns Job!**

Fragen?

