

CEP Magazine – January 2019 Assessing the whole global business environment

By Adam Turteltaub

Meet Carl Hahn, Chief Compliance Officer, Northrop Grumman, Falls Church, Virginia

Carl Hahn (carl.hahn@ngc.com) was interviewed in October 2018 by Adam Turteltaub (adam.turteltaub@corporatecompliance.org), Vice President, Strategic Initiatives & International Programs at SCCE & HCCA.

AT: First, how did you end up a member of the Northrop Grumman compliance team?

CH: In the summer of 2014, I was taking a break from running around the world doing internal investigations for my prior employer when I learned that Northrop Grumman needed a chief compliance officer. I was intrigued, one conversation led to another, and I found myself interviewing for the job. I determined that Northrop Grumman, its leadership, and its employees have a very strong commitment to ethics and integrity, so I thought the role was a good fit for me.

AT: Is there some particular aspect of your prior experience that prepared you for the chief compliance officer role? When thinking about that, what advice would you offer our members as they seek to develop their skills and careers?

CH: Adam, that's a great question. I'd emphasize the diversity of my background. I've had at least seven distinct jobs as a corporate lawyer (including an international assignment in Japan) that allowed me to engage with varied environments and cultures. One aspect of my experience that I have found particularly valuable is from negotiating and closing large, complex transactions with customers from many industries and geographies. I would encourage your members to seek opportunities, even short-term assignments, to sit with business teams and live through the reality of what they do on a daily basis. If you've, for example, helped close a contract under enormous time pressure and where the stakes for the company are high, you'll have a different and important appreciation for why people act the way they do in such situations and what incentivizes their behavior. These are the kind of insights upon which you can help build a truly effective compliance program.

AT: Before we go further, it's probably good if you give an overview of Northrop Grumman. As I learned when I was fortunate enough to speak at your meeting in Amsterdam — still an amazing coincidence that it happened at the same time and in the same hotel as our Academy — it's quite a complex and global organization.

CH: Adam I'm smiling at the memory of our respective groups sharing the same floor of the hotel in Amsterdam. You had great attendance at your Academy, which is such a wonderful resource for our compliance community. And we greatly appreciated hearing your insights for our team. As you know, I was there to help train our global team of Business Conduct Officers (BCOs). I should explain that BCOs are employees with day jobs who volunteer their time to promote our values and support our compliance program. They are such an important part of our efforts, so I make it a priority to spend time with them.

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