

## CEP Magazine - August 2019 What kind of culture do you want?

By Steve Priest

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By the time this column is published, our cottage industry of lawyers and consultants will have inundated you with commentary on the U.S. Department of Justice Criminal Division's updated *Evaluation of Corporate Compliance Programs*. [1] There is little new information of import, which may be good or bad. Your call.

There is a new question set on culture (page 15):

"Culture of Compliance – How often and how does the company measure its culture of compliance? Does the company seek input from all levels of employees to determine whether they perceive senior and middle management's commitment to compliance? What steps has the company taken in response to its measurement of the compliance culture?"

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