

CEP Magazine - January 2022 Meet Anna Romberg: Avoiding compliance fatigue

Anna Romberg, PhD, is EVP Legal, Compliance & Governance for Getinge AB in Gothenburg, Sweden

Anna Romberg (<u>anna.romberg@getinge.com</u>) was interviewed by Adam Turteltaub (<u>adam.turteltaub@corporatecompliance.org</u>), Chief Engagement & Strategy Officer at SCCE & HCCA.

AT: You are pretty unique in the world of compliance, in that you have spent virtually your entire professional career in compliance, but you have also simultaneously achieved an advanced degree in the field. What led you to decide to pursue an academic course while also working in compliance full time?

AR: I commonly say that my research project was spurred by professional frustrations. While working at Telia, I experienced the corruption scandal emerge from within and was frustrated at how the company was managing the risks on emerging markets. As a corporate governance and management accounting scholar, I was intrigued by how much effort was put into controlling the financial reporting—related risk, while the "non-financial risks"—as I labeled them a decade ago—were largely ignored. The company was highly successful in the former Soviet Union countries, had double–digit growth, high margins, and a belief that providing telecommunication services in these underdeveloped markets made the company sustainable, which blinded the company to the risks that were to become the end of the success.



Anna Romberg



Adam Turteltaub

I was looking to leave the company, and at the same time I started to explore from a theoretical perspective how companies manage nonfinancial or conduct-related risk. This exploration brought me to the world of ethics and compliance, and when the newly appointed Chief Ethics and Compliance Officer Michaela Ahlberg asked me to stay in the company, I saw a brilliant opportunity to employ this theoretical knowledge.

AT: I definitely want to talk more about your time at Telia, but let's first talk more about your academic work. I'm very impressed with your dedication and that you earned a doctor of philosophy in corporate governance and compliance. In your doctoral thesis, you argue that formal programs aren't enough; there needs to be acknowledgement of the "informal aspects" as well. What are those informal aspects? Why are they typically overlooked?

AR: All our colleagues who have implemented an ethics and compliance program in the midst of a scandal know how intense it is. You put in place risk assessments, draft policies and procedures, provide training, and implement control and monitoring structures. You report on the implementation of these formal structures and show that the company is doing a lot in terms of investing in ethics and compliance. At Telia, we successfully defended our ethics and compliance program to the Department of Justice and Hui Chen, and the company was not appointed a monitor despite the record-high fine. At the same time, we knew that these formal structures were highly dependent on us as individuals. We had to push hard, live through the friction, and ensure that the topics did not fall from the agenda.

The informal aspects are, for example, subjective and person-dependent decision-making, lack of a speak-up culture, and normalizing exceptions and excessive risk-taking. The informal aspects are those that prevent the ethics and compliance program—and the ultimate agenda of fostering more responsible business decisions—from becoming institutionalized.

AT: You're also a strong believer that compliance is dependent on heroes and how they cope with ethical struggles. Tell us more about what that means.

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