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On ethics: Steven Pegg

by Steven Pegg and Adam Turteltaub

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AT: I'm very eager to talk about both your career and Lockheed Martin's compliance program. Let's start with you. You came into this world not from an ethics background. You're an engineer by training and worked in program management and supply chain. How did that help you prepare you for the role?

SP: I agree this wasn't the most conventional route into an ethics role and, being totally honest, was not a role I would ever have imagined being in when I started my career as a flight test engineer at Boscombe Down all those years ago. While there was a logical progression from flight test into program management (PM) and supply chain management (SCM), my move to ethics was not planned. However, after 20 years of various PM and SCM roles, the decision was to either start another PM role or change career direction and get out of my comfort zone. An opportunity to move into an international ethics manager role came along at just the right time. The PM and SCM roles gave me a good knowledge of how the business operated and experience of real-world challenges and pressures that the ethics function was looking for at the time. This prior experience really helped prepare me for the ethics role in two ways: one, I was known by many of the employees and leaders I represented, and two, I had some credibility as I could relate to the very broad range of issues that came to me in the ethics role. Additionally, I was ready for a change and was keen to learn quickly from the excellent training I received on starting the new role—which totally reenergized me.

AT: Can you tell us about the training you received?

SP: Yes, indeed. On joining the ethics function, I received thorough investigation training, as well as training for using our in-house case management system. The investigation training is updated every year, is case study and scenario-based, and all ethics officers are required to take this. In addition, training included key policies, our ethics metrics requirements, and expectations for the role. All ethics officers receive multiple topic-specific training throughout the year and an annual test that must be passed. This was the most comprehensive training I have ever received in my career.

AT: From your experience in the business unit, what do you think ethics officers often don't get about businesspeople?

SP: If you haven't come from a business background, it might be hard to relate to the context of some of the queries ethics receives or even to some of the investigations we conduct in the business. It could be too easy for ethics to apply policies rigidly, whereas, in fact, many of the issues lie in the grey areas of policy. Every issue is unique, so ethics officers need to be able to relate specific facts to events and interpret policy accordingly. There

are instances where exception processes can be applied—depending on the circumstances of the issue and business situation ethics can advise on. Ethics is a resource to assist businesspeople, not a “policing” organization that may be perceived as always saying no.

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