

How WE DO THINGS HERE

code, conduct, compliance

BUILDING A LEGAL, ETHICAL WORKPLACE CULTURE

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Just imagine what would have happened not too long ago if an Arthur Andersen employee had come to a client social event wearing a golf shirt from one of the other Big Five firms. Or what the result would have been if a marketing manager at Enron had proposed a plan that publicized better rates or superior service offered by a competitor. It's highly unlikely that either of these acts would have occurred, but if they did, the individuals involved would have doubtless faced termination or censure as well as peer condemnation or ridicule.

When considering the current spate of business scandals—Arthur Andersen, Enron, Global Crossing, WorldCom, and others—an interesting question arises: How can companies enforce certain business protocols so effectively that they become an integral part of the operations, and yet fail to reign in blatant legal and ethical lapses that

might be the stepping stones to corporate ruin? Regardless of their policies and grand mission statements, these companies seemed unable to communicate the message about ethical business practices and how to handle potential problems in a manner that positively influenced the behavior of their employees.

Before addressing this question and proposing a few suggestions, let me make some observations. Chastened by recent corporate catastrophes, many organizations are approaching the issue of business ethics purely from a compliance perspective. In an effort to comply with regulations and requirements, they're making sure they have developed or updated codes of conduct and have taken steps to prove everyone has been exposed to the code. The regulators' response to the schemes and lapses has been to call for more laws and penalties to prevent corporate misdeeds.

In fact, most high-profile scandals are not caused by organizations failing to have codes of conduct or by individuals who face complex ethical dilemmas and cannot determine what to do in the absence of clear standards. The organizations embroiled in recent scandals had codes of conduct in place as well as systems and processes designed to prevent improper conduct and correct it when it occurred. Nor do these issues arise in a vacuum of legal regulations. The prosecutions and lawsuits already underway indicate that improper conduct did not occur in the absence of protections but rather in spite of them.

In most cases, corporate catastrophes start with questionable, illegal, or unethical acts, such as “cooking the books”; falsifying records; or defrauding customers, clients, or investors. As the improper behavior builds and begins to permeate the culture, it gradually becomes the standard of business practice in the eyes of the company’s employees. Next, individuals attempt to conceal the “bad acts” in a variety of ways. When people do eventually try to speak up and report problems, they are either ignored or retaliated against, and more efforts are made to cover up the improper conduct. From what I’ve observed, simply revamping and publicizing codes that are usually

already in place or passing new laws where current statutes already impose rigorous penalties will not lead to legal, ethical business operations.

Changing Behaviors to Build an Ethical Culture

The question is, what will? According to Sam Buell, a member of the Justice Department’s Enron Task Force, “The best inoculation against being crippled by a crisis in your business is to build a culture of openness, honesty and responsibility within your own ranks.”¹ To do so, leaders will have to take a hard look at their organization’s culture and ask themselves, “How do we do things here?” What messages are being sent, not just through words, but through actions? What is the accepted standard of behavior? How do managers and leaders respond to concerns? Is it in a manner that punishes or rewards employees for speaking up about problems? Without a fundamental change in the way people in the organization—and in particular, its leaders—behave, companies cannot build a legal, ethical culture, regardless of whether the issues they face are harassment and discrimination or fraud and foreign corrupt practices. In this paper, I’ll discuss some of the ways leaders can fuel a change in company culture

through behavior, words, key messages, and education.

Changing “The Way We Do Things Here”: Practical Solutions

“Whether all a firm’s employees work in one location, or whether they are scattered around the world, communicating a values-based culture can help build a sense of community in the workplace.”

– Business for Social Responsibility

Effective leadership is the single most important element in building a culture of honesty and integrity. As Noel Tichy, professor of organizational management at the University of Michigan’s business school, has pointed out, “Ultimately, you’ve got to have leadership at the top who have (a) integrity, and (b) teach it.”²

Of the many similarities between the recent headline-grabbing cases, one of the most telling is the behavior of leaders. These companies may have had policies and values statements decrying illegal or unethical conduct, but the actions of senior leadership contradicted those statements and sent a message to employees about what the real standards and expectations were. Enron, WorldCom, Arthur Andersen, Texaco—the names have become almost synonymous with seemingly

over-the-top violations, and in all of them, management led the way to high-profile scandal. Enron required new employees to sign a code of conduct statement before joining the firm, yet its Board suspended the ethics code twice to allow off-the-books partnerships that would financially benefit a company executive. According to Dick Thornburgh, a former U.S. attorney general examining the WorldCom fraud, “When...actual earnings faltered, their top management resorted to a smorgasbord of manipulation to falsely inflate...earnings.”³ Texaco offered wide-reaching diversity training, yet high-level company executives were caught on audiotape make racially derogatory comments. These leaders’ actions all but nullified codes of conduct and values statements that spoke of integrity, honesty, and fairness.

The Leader as Role Model

It’s not simply an issue of the outcome of the leader’s behavior—it’s also an issue of setting precedence. Employees model their own behavior after the examples set at the top. Whether their behavior is appropriate or not, leaders set the example for everyone else in the

“No organization is stronger than its leadership...”

– Edgar Powell

organization to follow. When management cuts corners, employees see it as accepted business practice. Lawrence Wienbach, head of Unisys, recently said, “Once you as CEO go over the line, then people think it’s okay to go over the line themselves.”⁴

On the other hand, leaders who demonstrate that the values of integrity and honesty are important to them—by living those values themselves and taking prompt, appropriate action when others’ behavior contradicts those values—set a powerful example as well. In today’s environment, leaders—and not just CEOs—who operate unethically or inappropriately have a choice: they can either change their behavior and “how we do things here,” or they can watch themselves and their organization become the next to land on the latest media “scandal report.”

“One of the tests of leadership is the ability to recognize a problem before it becomes an emergency.”

– Arnold Glasgow



Developing and Communicating the Message

In addition to ensuring their own behavior embodies the company’s values, leaders also need to effectively verbalize the message to their

employees. Managers and employees are often the front line to clients, vendors, and shareholders. If they don’t fulfill their responsibilities through ethical, legal behavior, the business will suffer—through the loss of customers, diminishing of shareholder confidence, and/or lost sales and revenue. As a result, they need to understand not only what their responsibilities are but how their actions are tied to the bottom line.

Crafting a clear message is vital. Most organizations can look internally for examples of how to develop and communicate key messages about the way they do business. For instance, employees working for a major consumer products company know that they shouldn’t use a competitor’s products at work. There are no complex codes or legal statutes that guide this behavior; it’s something that’s communicated straightforwardly and genuinely, a simple, clear directive tied to the company’s culture—“how we do things here”—that employees understand and take to heart.

Messages about important business standards, ethics, and values should be no different. Yet too often, they are mired in complex language, jargon, or legalese that sounds insincere at best and incomprehensible at worst. And even more damaging, as we’ve seen, the messages can be lost completely

when senior executives decide the rules don't apply to them.

Many organizations post stylized codes of conduct in the hallways or distribute them on a regular basis, and yet they may be surprised to learn that doing so has little or no discernible effect on employee behavior. A code of conduct doesn't do much good if people don't understand how it impacts their workplace actions and that abiding by it is an element of proper business performance.

In many codes of conduct or other communications, the pieces that are missing—the elements so effectively communicated in messages such as “don't use our competitor's products at work”—are the business connection and consequences. Leaders need to

communicate not only what the standards are—every organization has those—but also how they impact the business's image, brand, and survival.

Employees must understand that their actions impact the company's operations and, as such, they will be held accountable for them through performance management tools and other methods. By communicating with clarity and simplicity and acting in line with these directives, leaders will send a strong signal to their employees that they mean business.

I'd suggest that leaders communicate the messages presented in the box below over and over again and with the same clarity they use to speak about sales goals, safety, customer satisfaction, and brand image.

In a voice that suits their own culture and style, leaders should say:

Principle #1:

Know the basics of our code of conduct; you have to follow the rules to stay here.

Principle #2:

Don't ever lie or cover up problems no matter how tempting it may be.

Principle #3:

Managers, make sure your people know to come to you (or someone else who can take action) with problems, and make sure you respond properly so the issues can be investigated and corrected.

Principle #4:

If you're not sure what to do, get help; we want to know about and fix problems.

Creating a Welcoming Environment for Concerns

As principles 2, 3, and 4 indicate, preventing problems or “bad acts” is only part of the message. In almost any major corporate disaster, it’s not just one or more bad acts in violation of a code or the law that causes the ultimate unraveling. As noted earlier, there is typically an effort to cover up the conduct through fabrication of evidence or collusion to manufacture testimony. Usually there are also individuals who uncover the problems and are either unable to raise them or worse, retaliated against or dismissed when they do.

Consider the actions of a former Andersen partner who ordered the destruction of Enron-related documents (attempting to cover up the bad act), or the WorldCom managers who allegedly directed an employee to falsify financial records and then fired him when he refused to do so (retaliation against an employee who recognizes the impropriety and won’t go along with the bad act). With these actions, bad situations became much worse. Employees, the public, legal institutions, and the media recognized that catastrophe was not inevitable. The damage could have been avoided or at least minimized if management hadn’t squandered the opportunity to stop the behavior and address the problems.

To create a welcoming environment for concerns, organizations need to educate their managers on how to handle employee complaints. Supervisors need to know what issues they should manage themselves, when to get help, and when to raise the concern to a higher level in the organization. Managers also need to build the necessary skills for listening and responding to complaints and following up with their employees. Whether or not they are ultimately responsible for generating the resolution, managers need to become “issue spotters,” and they must understand the crucial role they play in ensuring concerns are addressed promptly and appropriately.

Employees must also be encouraged to raise concerns and should understand that doing so is a part of everyone’s responsibility to the organization. They need to know what channels are available to them and how to best present issues so they can be adequately addressed. Ignoring problems or covering them up should never be tolerated and must be recognized as bad acts unto themselves.

“The public may be willing to forgive us for mistakes in judgment but it will not forgive us for mistakes in motive.”

– Robert W. Haack, former President
New York Stock Exchange

Real-World Examples

This is a notion the nuclear industry knows well. Nuclear utilities have a legal mandate to maintain an environment where employees understand that raising concerns about operational, safety, or other issues is an integral part of the job. I've worked with numerous utilities over the years that have focused on overcoming what's known as a "chilled environment"—one in which management's response to those raising concerns discourages others from coming forward. They may have retaliated against complainants, ignored them, or attempted to stifle them, and in doing so, created a workplace that effectively ensured no one would be willing to bring up concerns in the future. In a chilled environment, every employee knows "how we do things here." The message is loud and clear: don't raise concerns—they are not welcome, and doing so could cost you your job. Changing that message takes a strong commitment, planning, and ongoing attention, but it can be done.

When we teach managers in nuclear utilities about their responsibilities for ensuring safety, the key learning point they take away is that they must take action to stop inappropriate, unsafe, or illegal behavior when they become aware of it. It is simply a matter of risk

management: bad acts may happen, but the damage can be reduced if managers respond correctly. In the nuclear industry in particular, it's not just a "nice thing to do": safety problems that go unchecked and uncorrected can have serious consequences that can impact workers as well as entire communities. Therefore, all members of the organization have specific responsibilities that, when fulfilled, help ensure the safety of the workers as well as the public.

The utilities that have been successful in changing their climates have had a commitment from the top that this is a serious business issue at least as important as any other. Organizations in other industries have experienced similar successes by following the same formula. For example, I have worked for a number of years with one of the most prestigious medical organizations in the world. It is renowned in the industry not only for its expert diagnosticians and specialists, but also for its culture of integrity and respect. This culture is ingrained into the

"People don't expect perfection. There are always going to be problems. What we want to see is companies willing to step out in front."

– Art Taylor, President
Wise Giving Alliance
The Better Business Bureau⁵



operations of the organization—every member of the staff knows the organization’s standards, but even more significantly, they know the leaders stand behind them.

Recently, we partnered together to develop a program that would communicate those messages of professionalism and respect to their incoming interns, residents, and fellows. The program’s concepts and subject matter are fairly straightforward, but the key to its success has been a simple yet powerful element of the process. Outside trainers weren’t brought in to teach the sessions. Instead, the physicians who head up each department facilitate the courses themselves. They stand up in front of their residents and say, in essence, “This should be important to you because it’s important to me.” This message, delivered clearly and frequently by a credible leader, is more powerful than any mission statements, codes, glossy brochures, or award-winning video training products could ever be.

Training as an Element of the Process

In the wake of Enron and other scandals, many organizations are scrambling to issue or update codes of

conduct, blanket their employees with training on ethics or compliance issues, or provide statute-by-statute instruction on a range of legal topics. Yet as we have seen, these steps are important but not sufficient. Codes, ethics hotlines, and other communication tools are only individual elements of an overall solution.

A study conducted in October of 2001 at Penn State University’s Smeal College of Business Administration discovered that, “although ethics programs are widespread, they are sometimes perceived to be ‘window dressing’ only.”⁶ Employees know when management stands behind the messages they deliver because they see it every day—they see it when concerns are taken seriously and when problems are addressed. These actions affect the way employees perceive the organization and are crucial to the success of any ethics program. Yet many courses focus only on meeting organizational compliance requirements. By doing so, they’re missing a fundamental point: to be successful, a training program must impact the way people behave at work by giving them appropriate skills and linking their conduct to real business consequences.

Unraveling the Legal Implications

Scores of laws at the state and federal level regulate financial transactions, employment practices, product safety, environmental safety, antitrust, intellectual property, and a number of other compliance areas. In addition to prohibiting certain types of conduct and business methods, they also forbid retaliation against individuals who try to complain of unlawful practices internally. In the current climate, all of these laws and regulations are seen as vital to maintaining an ethical, legally compliant workplace. Therefore, providing education is a vital part of the process.

However, if the idea is to affect behavior rather than to merely communicate requirements, inundating managers and employees with the details of these numerous laws and regulations is not the answer. It's nearly impossible to communicate every form of improper conduct that may cause a business problem—no one could remember such a list. Does anyone really think that managers can master these laws with anywhere near the same degree of competence they are expected to demonstrate in the core functions of their jobs? Even if they could, new forms of misconduct always seem to be around the corner. The U.S. Department of Labor's website currently lists nine different

provisions prohibiting retaliation against individuals for complaining of potentially illegal practices⁷, and there are other statutes that prohibit retaliation in order to protect employees for raising other kinds of concerns⁸. Finally, many states have their own parallel or separate regulations.

Attendees at the Ethics Officer Association's 10th anniversary conference in October 2002 received an eight-pound binder containing current compliance requirements and regulations.

– “Keeping an Eye on Corporate America”
Alynda Wheat
Fortune magazine
November 25, 2002



Beyond the complexity, regulatory statutes are also often ambiguous. A clear example of this is the Sarbanes-Oxley law which contains provisions whose meaning is unclear even to the congressional and executive representatives who supported the legislation. In addition, apart from a lack of clarity, numerous workplace regulations are, by their very nature, extremely complex, rife with exceptions, and counter-intuitive. Many organizations employ specialized counsel to deal with separate segments of the same statutes or types of regulation. For example, an employer

may use one lawyer for ADA advice and defense and another for counsel on harassment claims, even though both issues involve employment law in general and civil rights in particular. For these reasons, it's simply unrealistic to think that individual managers can be taught to recognize the nuances of not one, but many applicable laws to avoid legal and business pitfalls.

Aligning Culture and Curriculum

On the other hand, instruction on legal issues is, as noted, important. It communicates the significance of legal conduct, is required under some laws, and can sometimes help reduce damages and criminal penalties. So what should organizations do? How can they communicate managerial responsibilities under various laws while still maintaining a clarity and simplicity that can be understood and applied? We can't expect business people to become legal experts, but the good news is they don't need to. Stock prices don't plummet, a brand name isn't seriously harmed, and the government doesn't launch massive investigations or congressional inquiries because executives, managers, or employees failed to recognize the applicability of an obscure regulation or misjudged an ethical gray area. For egregious behavior to thrive, the organization

must have a culture that tolerates or even supports it. And while increasing the risk of criminal and financial penalties for leaders who promote improper behavior is a step in the right direction, it won't affect the much larger workforce population.

If the message must be simple and clear, then the training should be, too. As with communication initiatives, workplace educational efforts on these topics must be tied to specific behaviors and specific consequences for proper and improper conduct. They must teach individuals their responsibilities and roles in addressing problems that are brought to their attention, and provide them with the skills they need to fulfill their obligations.

“When General Electric evaluated its ethics training programs, it discovered that interactive training had a 70 percent better retention rate than simple lecturing.”

– Business for Social Responsibility

Recently I worked with an international corporation to help them communicate standards of business behavior to their managers throughout the world. We realized early on that attempting to address all of the laws

governing individual countries would not only be difficult to do, but it would also diminish the effectiveness of the message. Instead, we developed a program based on shared policies, skill building, and a sound business rationale that every participant can understand and apply, regardless of where they may be located. Similarly, when training nuclear industry professionals, we don't focus on the intricacies of the Nuclear Regulatory Commission's statutes and regulations—we focus on the behaviors managers need to follow to conduct themselves in line with policies and standards, and give them skills to effectively and legally handle employee concerns.

“To change a business's culture, you need a set of processes...that will change the...behavior of people in ways that are directly linked to bottom-line results.”

– Larry Bossidy
[Execution: The Discipline of Getting Things Done](#)

An Action Plan

Today, organizations should take a page from the nuclear industry by treating individual accountability, honesty, and responsibility as serious company issues, just as important as any other. As we have now seen, the failure to take appropriate action can be catastrophic no matter what business you're in.

Any plan for developing an ethical, legal culture consists of several important steps that can apply to any industry or specific compliance issue:

1. **Executives must live the organization's mission and values through their own words and actions.** Setting an appropriate standard is one of the most important ways leaders guide legal, ethical operations. Their behavior ultimately sets the standard for the company's culture—“how we do things here.”
2. **Senior executives must define a clear vision of the organization's commitment to lawful and ethical operations as a cornerstone of the business, not just a legal or human resource issue.** Company leaders' words should be simple, clear, and direct using a format similar to the “Four Principles” included here. They must repeat the message to their direct reports, model key

behaviors, and intervene when others do not behave in accordance with company standards and policies.

3. Organizations should treat the mission of creating a culture of honesty, accountability, and responsibility as an ongoing business marketing campaign, with an internal rather than external target audience. All employees and individuals who work with the company must be apprised and reminded on an ongoing basis of the campaign's themes. As with any marketing campaign, there needs to be a plan, the message must be communicated in a variety of ways, and it must be repeated, repeated, and repeated again.

4. Managers—and ultimately, employees—must learn the skills necessary for fulfilling their responsibilities. While they don't need to know the intricacies of numerous compliance laws and regulations, they do need to know:

- a. that the company's commitment to ethical and legal operations is a serious business mission,
- b. that individuals who bring forward concerns about potential problems are to be welcomed rather than retaliated against, and

- c. that specific behaviors must be followed by everyone as an element of corporate citizenship and business necessity.

In some cases, certain managers may need specific instruction on legal requirements, but the requirements should be presented in the context of the organization's business operations and values.

5. Managers need instruction on skills that encourage employees to come forward with concerns, including:

- a. how to listen and respond to complaints,
- b. where to go when issues are brought to their attention, and
- c. how and when to follow up.

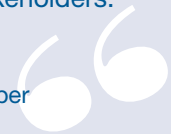
Supporting the Message

We can't expect leaders, managers, or employees to consult a rule book every time they have to make a business decision. What we can expect and must require is that individuals be guided by a clear set of simple principles that are easily followed and taken seriously by everyone at all levels in the organization. Once these principles are communicated regularly, modeled by senior executives, and treated as elements of corporate citizenship, organizations will be well on their way to creating the kind of culture that defines "how we do things here" in ethical, legal terms.

Tom Tierney, author of **Aligning the Stars**, a book about corporate culture, has said, "A corporation's culture is what determines how people behave when they are not being watched." It does not necessarily have to be defined by the bad acts of an individual—instead, it hinges more on the reactions of other individuals, and the company as a whole, to those bad acts. It succeeds when the simple message, "We won't tolerate it" is just as ingrained in the standard of business practices as the message, "Don't use our competitors' products at work." And it succeeds when the behavior of all members of the organization—leaders, managers, and employees—supports that message.

"[G]ood corporate governance aligns the interests of management, shareholders and other stakeholders."

– Ron Baukol
3M Board of Directors Member



Acknowledgments

Endnotes:

- 1 “Ashcroft warns executives about corporate cover-up consequences,” *The Atlanta Journal-Constitution*, September 28, 2002.
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- 4 “When something is rotten,” *The Economist*, July 25, 2002.
- 5 “Bus company, Cat win Torch Awards: BBB presents honors for high ethical standards,” *Peoria Journal Star*, Steve Tarter, October 24, 2002.
- 6 “Perceptions of organizational justice vital to workplace ethics programs,” *Business Ethics Quarterly*, 2001.
- 7 The Clean Air Act (Employee Protection Provisions); the Comprehensive Environmental Response, Compensation and Liability Act (Employee Protection Provisions); the Energy Reorganization Act of 1974 (Employee Protection Provisions); the Occupational Safety and Health Act of 1970; the Safe Drinking Water Act (Employee Protection Provisions); the Solid Waste Disposal Act (Employee Protection Provisions); the Toxic Substance Control Act (Employee Protection Provisions); the Federal Water Pollution Control Act (Employee Protection Provisions); and the Regulations Governing Procedures for Handling of Discrimination Complaints Under Federal Employee Protection Statutes.
- 8 Some examples include the False Claims Act, which prohibits adverse employment action against employees who report any wrongdoing to the government; Title VII of the Civil Rights Act of 1964, which prohibits retaliation against an employee who testifies on behalf of another employee with regard to harassment or discrimination claims; and the Victims and Witness Protection Act, which prohibits tampering with witnesses to influence, prevent, or delay their testimony.
- 9 “When something is rotten.”

Additional Contributors:

Marla Greenberg and Lori Shapiro, Esq., also contributed to this paper.

About the Author

Stephen M. Paskoff, Esq., is the founder and President of Employment Learning Innovations, Inc. (ELI), an Atlanta-based firm specializing in providing workplace learning solutions that focus on behaviors and outcomes while helping organizations minimize risk and maximize productivity and business results. ELI's award-winning learning methodology provides an interactive and engaging experience for managers and employees, communicating their roles and responsibilities for maintaining fair, legal business practices and giving them the tools they need to apply the concepts back on the job.

Over the years, Mr. Paskoff and ELI have worked with a number of nationally known industry leaders to help them communicate standards of proper legal and ethical behavior along with their companies' own missions and policies in order to build productive, civil workplaces.

Mr. Paskoff is a nationally recognized speaker on workplace legal issues, and has been a keynote speaker at a variety of national conferences. He has been interviewed by CNBC, ABC's *20/20*, *USA Today*, *The New York Times*, and Fox News, among others, about workplace legal issues as well as the workplace impact of current business and national events.

Prior to establishing ELI in 1986, Mr. Paskoff was a partner in a management law firm and a trial attorney with the EEOC.

About Employment Learning Innovations, Inc.

Employment Learning Innovations, Inc. (ELI) develops integrated learning solutions that assist organizations in changing workplace behaviors, communicating standards of business conduct, and building a proper legal and ethical work environment that helps minimize disruptions and the risk of costly lawsuits and scandals.

ELI's proven learning methodology focuses on outcomes that impact bottom-line business results. By taking complex legal issues and presenting them in everyday language with easy-to-remember guidelines, the programs provide participants with the tools they need to fulfill their responsibilities for maintaining a productive, legal, and diverse workplace. The ELI curriculum provides interactive, engaging classroom and online learning experiences that reach all constituencies within an organization, ensuring a consistent message is communicated throughout.

ELI also offers specialized learning solutions addressing legal and compliance issues in the fields of banking, healthcare, and safety, among others. In addition, ELI instructional designers, legal experts, and publishing specialists have worked closely with a number of organizations over the past 16 years to develop customized training programs on a wide variety of legal and compliance topics, including workplace violence, performance management, corrective action, and international employment concerns.

ELI's flagship courses, *Civil Treatment® for Managers* and *Civil Treatment® for Employees*, have won numerous awards over the past decade, including "Top Ten Training" designations from *Human Resource Executive* magazine, the "Distinguished Legal Service Award" from *Corporate Legal Times*, the MCAi GOLDEN Reel® Award, and the Silver AXIEM Award for *Civil Treatment® for Managers Online*.

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