

“What I get most importantly... is peace of mind.

A *Broadcat for Champions* Customer Story as told by Craig Allen of Sterling Construction Company, Inc.

At the end of last year, we had the basics: CCO annual reporting and quarterly presentations to the Board Audit Committee, policies and procedures, a Code of Conduct, a hotline, an annual education plan and some formal training.

An outside review of our program, however, indicated that we were missing communications that tied it all together. And this wasn't just a nice-to-have: we knew communications were part of an effective program under the Federal Sentencing Guidelines, and we needed to get it right.

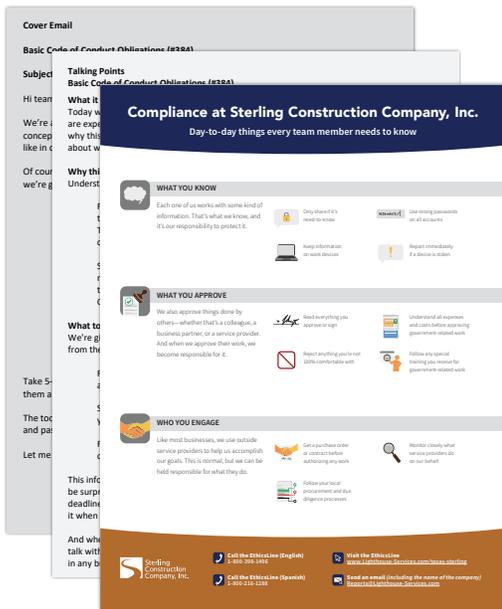
Now, it's easy enough to send out a newsletter with some statistics and quotes about ethics and maybe a scenario. But that's not what the Department of Justice asks for when they talk about operationalized compliance. We knew we had to treat compliance just as seriously as we treat safety on the job: we had to explain how it applied to our work, not just talk about it in the abstract.

And that is hard; I know, because I wrote the first wave of communications myself. And honestly? While they were generally well-received, the hard cold fact is people generally don't care (or pay attention).

Our team wants to be a good business partner, and I knew two things; the continuum of “I-Don't-Care” wasn't going to work and, second we needed help

“Broadcat's manager kits were exactly what I needed.”





Sterling's Basic Code of Conduct Obligations Kit

in establishing relevance, so doing this in-house just didn't make sense for the company. That's why I'm glad our outside consultants recommended that we check out Broadcast.

Broadcast's manager kits were exactly what I needed. They cover substantive topics, with actionable advice, in an easy-to-read infographic, checklist, or flowchart format that our employees can use over and over again. They let me empower our teams to

own compliance by understanding what it means for them, giving them tools instead of just transmitting information.

Importantly, I got each piece in Sterling's branding, with a round of my substantive edits included. Instead of making things from scratch, I simply mark up the infographic and send it back for Broadcast to revise so that it looks and feels right at home here.

That means I'm able to use my time for things truly unique to Sterling instead of reinventing the wheel.

Broadcast's simple, eye-catching materials got me instant feedback, too. We're a publicly-traded construction company, and to be honest I wasn't sure how well they'd go over with the variety of ages, skillsets, and professionals we have here. It's a diverse and tough audience.

“...the positive feedback flowed in.”

But as soon as I sent out my first kit, the positive feedback flowed in: from a millennial, and then a baby boomer, and then even one of our outside directors. They loved the format and simplicity, and these tools have become a powerful ally in building my compliance brand.

What I get most importantly, however, is peace of mind. Peace that I'm not only doing something that makes sense for the business and that our employees like, but in a way that supports our culture by making compliance simple and meaningful.

I've realized you don't have to make a trade-off between compliance that you can defend to the government and compliance that employees will actually use and like. You just need the right tools to make it practical and accessible, and that's what I've got with Broadcat.



Sterling Construction Company, Inc., headquartered in Houston, Texas is a publicly-traded heavy civil infrastructure construction company with 2,000 employees and \$1 billion in annual revenue. Sterling operates through a series of subsidiary companies, with ethics and compliance handled at the corporate office by Craig Allen, a Senior Vice-President serving as the Chief Compliance and Administrative Officer.

Craig was formerly Sterling's Chief Human Resources Officer, taking on the responsibility of Chief Ethics and Compliance Officer in 2013 to build the company's first formal ethics and compliance program. He has a MBA and a Master's in Jurisprudence.

