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MORE ABOUT ME

If you could tell your past self one thing, what would it be?

Stay grounded in radical compassion, curiosity, and fascination. Outrage is a great motivator, but it only gets you so far.

The interview for your dream job ends with a solo karaoke performance – which song would you perform?

Give a Little Whistle (Let your conscience be your guide) by Jiminy Cricket

What is the most beautiful place you've ever seen in person?

The source of the River Nile in Jinja, Uganda – where my mother was born. I highly recommend seeing it from a white-water raft.

What is your biggest ever extravagance?

I consider myself thrifty until it comes to travel – then you can just take my money – as there's something magical about immersing oneself in an entirely different culture and forging connections through new languages, new food, and diverse perspectives.



Asked & Answered

THE SECRET SAUCE OF COMPLIANCE

What is your secret sauce for compliance?

Ensuring my function is considered the “office of unlock” – rather than the office of no, or some bolt on. This means framing compliance as the key to unlocking responsible business and facilitating growth – be that for new customers, new industries, new markets and geographies, or with new partners. My business partners get to build the plane, decide where to fly, when, and how fast, and how high, but the compliance team can help them clear the runway, take off, fly and land safely.

To what extent are you concerned about Compliance Officer liability?

My sense is that Compliance Officer liability will be reserved for the most egregious cases of intentional misconduct. Last fall, SEC enforcement director Gulbir Grewal emphasized in a public statement that enforcement actions against compliance officers are “exceedingly rare” because the commission has “no interest” in pursuing actions against compliance personnel who act reasonably or in good faith.

I take comfort that a good faith defensible narrative of doing hard things well and a reasonable path to compliance maturity will keep compliance officers out of trouble.

What is the ideal relationship between Compliance and Legal teams?

Compliance and Legal ideally collaborate to provide a seamless service to their “customers” in the business and to identify and mitigate risk to unlock responsible business. I have worked very closely with business affairs lawyers to ensure we are operationalizing our good intentions through well-crafted agreements, customer and supplier codes, and processes for onboarding vendors and suppliers.

Several traditional legal functions are specialized compliance functions; for example, a product, privacy, or employment lawyer might be responsible for oversight and governance of specific rules and regulations around any of AI, product safety, data protection, hiring, harassment, etc. The DOJ guidelines on the elements of an effective compliance program apply to those areas of corporate compliance.

Is Artificial Intelligence a pro or a con to the compliance profession?

I am team AI all the way. First, it is incredibly exciting as a compliance professional to be able to roll up our sleeves at this pivotal moment and do our part to unlock responsible artificial intelligence and machine learning by design and by use. Second, we will be called upon not only to ensure AI doesn't cause harm, but also to leverage it to prevent harm. We can leverage this technology to quickly analyze data, get answers fast, to find patterns, to crowdsource risk intelligence, and to highlight red flags at speeds that were previously unattainable. The compliance profession has a pivotal role to play in what is becoming known as the fourth industrial revolution.

The DOJ recently announced its Whistleblower Pilot Program. Should companies provide internal rewards for whistleblowers?

While so far, no company is required to provide monetary rewards to incentivize whistleblowing about potential harm or wrongdoing, the DOJ has expressly stated that the way a company incentivizes behaviors will be a subject of some scrutiny as part of sentence guidelines. From March 2023, the DOJ indicated that it would consider whether a company has developed compliance-promoting criteria within its compensation system, including through potential clawbacks of compensation paid to employees who engaged in or oversaw wrongdoing.

Providing internal rewards for whistleblowers can be an effective way to encourage a speak up culture, set the tone that we want to know, and demonstrate our commitment to and gratitude for information that protects the company and its stakeholders. Just as the SEC and DOJ have set out clear parameters for the operation of their programs, internal compliance functions will have to be thoughtful about what behaviors to reward and how.

Defining who is a whistleblower and how to protect them will be key. Compliance functions might think about leveraging third-party hotline vendors to provide the awards anonymously, and to be transparent about the type and number of awards granted and issues resolved as a result.

To what extent should a compliance and ethics program have coverage of off-channel communications?

This is a tricky one. US regulators have made it clear that they expect companies to oversee and provide governance around off-channel communications. In certain regulated industries, like the financial services industry, firms will be required to maintain all business records and not permit business communications on channels that can't be preserved and accessed by the firm. We have seen some big fines for falling afoul of this rule in the financial sector. As a rule, I don't like to publish a policy that isn't likely to be followed or enforced. Policies that make using certain means of communication a condition of employment are difficult to enforce given how people want to communicate and how fast these methods come and go.

If you weren't a compliance professional, what would you be and why?

An investigative journalist or war correspondent. When I was a child, I was very moved by news stories of war and passenger planes falling out of the sky. I wanted to understand how and why these things could happen – and for many years, I thought I would go out there and find the stories, interview the people on the ground, and get to the bottom of this. I was also fascinated by trial attorneys on TV, so that motivated me to become a wig-wearing barrister prosecuting those responsible for corporate manslaughter or corruption. My path to a compliance officer came with the realization that there are lots of corporations with positional power, bright minds, and funds to solve wicked problems and this is how I ended up in corporate compliance roles with big brands, helping to operationalize their good intentions.

THE POLL RESULTS

We asked....

If you're hiring, how do you feel about candidates contacting you directly as well as applying, or instead of applying?

Positively, it shows ingenuity

50%

Doesn't impact my decisions

39%

Negatively - it's over-eager

11%

LOOKING TO HIRE IN COMPLIANCE OR LOOKING FOR A JOB YOURSELF?

Please click on the links below:

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