



Five steps to tackling culture

Why the 'soft stuff' is just as important as the 'hard stuff'



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The case for culture

Why the 'soft stuff' is just as important as the 'hard stuff'

The importance of culture and values is not a new phenomenon. For many years, researchers have pegged culture as the culprit for corporate scandals, failures and industrial disasters. Despite lessons emanating from cases like Bhopal, Enron, Space Shuttles Challenger and Columbia, and the Deepwater Horizon Oil Spill, to name a few, the business community has been slow to learn and systematically respond.

Enron was the poster child for bad culture. We may forget that before the fall, Enron was held out as a model of good corporate governance. In October 2000, Enron was credited with having one of the five best boards by Chief Executive magazine¹. Enron's failure destroyed approximately \$60 billion in market value and \$2 billion in pensions, displaced thousands of employees², precipitated the failure of Arthur Andersen, and significantly increased regulatory requirements for corporations and public accounting firms. Unfortunately, the response by regulators and the business community largely missed the fact that culture – poor leadership, behaviors and informal norms (the 'soft stuff') – played a significant role and that a focus on 'hard controls' is not enough.

Similarly, the Walker Report, commissioned by the U.K. government in 2009 to examine corporate governance within banking focused its findings on 'hard stuff': risk management, board composition/effectiveness, and role of institutional shareholders³.

Sir David Walker himself, author of the Walker Report, acknowledged that a significant point missing from his original report was culture, stating "The need is not only to focus on hard risk, where the world is now in a much better place, but also to focus on soft risk or culture."⁴

Although it's taken some time, culture is now getting more attention.

It is now widely accepted that culture was at the root of the Global Financial Crisis and that the 'soft stuff' can no longer be ignored. Some banking regulators have responded by incorporating culture considerations into their supervisory (i.e., oversight) guidance. These developments are triggering a sea change in governance, risk management, and internal audit, and specifically risk management and conduct are now being considered not as separate to, but rather in the context of, the organization's broader culture.

According to survey results published in "Corporate Culture: Evidence from the Field", over 90% of executives believe culture is important and that improving culture would improve their organization's value. However, only 15% believed their culture is where it should be.⁵

¹ Robert Lear and Boris Yavitz. "The Five Best and Five Worst Boards of 2000", Chief Executive Magazine, October 2000.

² Associated Press. "10 YEARS LATER: What Happened to the Former Employees of Enron?", Business Insider, December 1, 2011.

³ Sir David Walker. "A review of corporate governance in UK banks and other financial industry entities – Final recommendations", November 26, 2009.

http://webarchive.nationalarchives.gov.uk/+/http://www.hmtreasury.gov.uk/d/walker_review_261109.pdf (accessed October 31, 2016).

⁴ Martin Arnold. "A banking grandee's rethink on the rules of the game". Financial Times, December 10, 2014.

⁵ Graham, John R, Campbell R. Harvey, Jillian Popadak, and Shiva Rajgopal. "Corporate Culture: Evidence from the Field", New York Federal Reserve, October 14, 2015.

https://www.newyorkfed.org/medialibrary/media/research/conference/2015/econ_culture/Graham_Harvey_Popadak_Rajgopal.pdf (accessed October 31, 2016)

These are exciting times. The opportunity to deliver value and improve risk management through more focused attention on culture is significant.

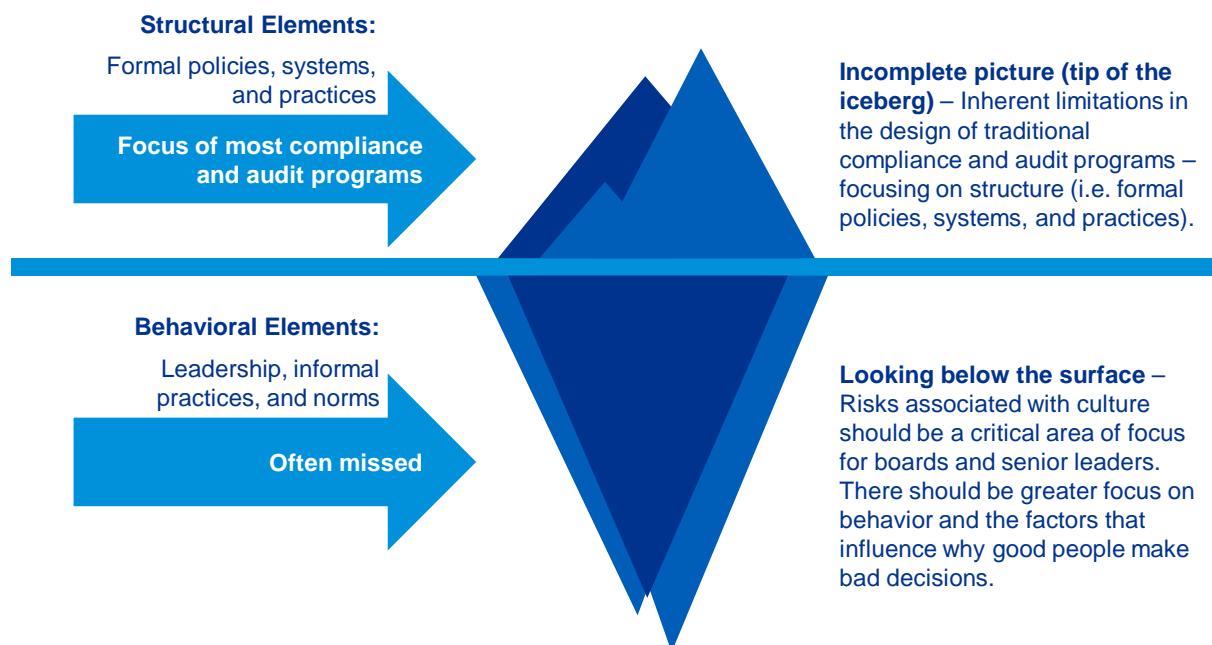
Why the soft stuff is hard

Weaving values into the fabric of how the organization operates is no easy task because it takes concerted attention day in day out, and year in year out. Values often feature as more of a 'bolt-on' program than as a truly integrated part of how an organization achieves its strategy and carries out operational activities and decisions. An organization can espouse a set of values, but there is often a gap between 'what is on the poster' and reality. There are a lot of factors that will impact upon success in embedding your desired culture; realistically, changes in people, process and behavior will be necessary.

As you tackle culture, it is important to keep in mind that:

1. Culture is dynamic. Culture is constantly evolving based on macro and micro changes in the internal and external environment (e.g., leadership changes, regulation, geopolitical pressures). Therefore, it is critical to keep your finger on the pulse of culture and course correct, when and where needed.
2. Culture is not singular. Organizations are typically a microcosm of subcultures. There may be commonalities across functions, geographies and leaders, but there are likely differences as well.
3. Culture is shaped by formal systems (i.e., structural) and informal norms (i.e., behaviors). Efforts tend to focus more on formal systems when trying to influence and measure culture. However, informal norms are often more powerful and indicative, but harder to influence.

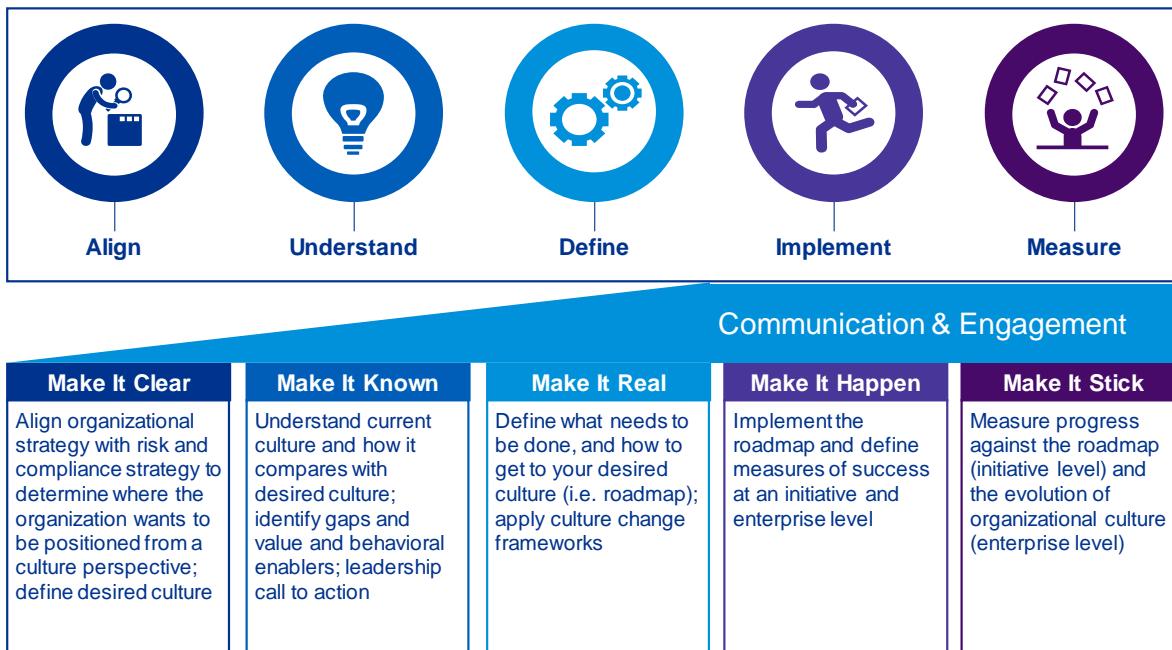
Businesses have not traditionally taken steps to understand and measure their culture beyond periodic employee surveys. However, there is an increasing realization that measurement is possible and important. As a result, compliance and internal audit teams are being asked to identify ways to measure culture (e.g., is the culture we want (or need) the culture we have?).



Five steps for tackling culture

Tackling culture can seem daunting, but the good news is that it is possible, and can be transformative. KPMG supports organizations with a roadmap to strengthen culture and soft controls. KPMG's framework starts with setting clear expectations, ensuring those expectations are tangible and known, and then helping what was once an aspirational approach to culture become a reality.

Here is the KPMG approach for managing culture change.



1. Make it clear

Who do we want to be?

The first critical step organizations should take is being clear on who they want to be and how this can support the organization's strategic ambitions.

Values statements are good, but on their own have little impact. In a study conducted by professors at Northwestern University, University of Chicago and the Einaudi Institute for Economics and Finance, Innovation was the most advertised value – appearing in 80% of the S&P 500 firms, followed by Integrity and Respect (70%), Quality (60%) and Teamwork (50%)⁶. Nearly every organization has values statements, but less common are the companies whose values reflect who they are and drive how they operate in the day-to-day. This does not happen by chance.

In fact, it can be said that a value is aspirational, that is, the organization is trying to achieve it. When organizations have it, it is a norm and already part of how they operate. Therefore, values require action to move them into operational norms.

Fundamentally, if you don't know what culture you are aiming for, how can you be successful in shaping it?

To 'Make it Clear', culture expectations need to be translated from the 'conceptual and theoretical' to the 'tangible and actionable'. The right level of clarity and definition can foster understanding and commitment, empowering leaders and employees to positively impact the organization's culture through their daily actions.

Organizational culture should support and enable organizational strategy. To achieve success, culture should not be a 'bolt on', but be considered as an integrated part of how strategy will be achieved.

"Culture eats strategy for breakfast."

—Peter Drucker

⁶ Guiso, Luigi, Paolo Sapienza and Luigi Zingales, "The Value of Corporate Culture", page 10 National Bureau of Economic Research, October 2013. <http://www.nber.org/papers/w19557.pdf> (accessed October 31, 2016).

What you can do...

Is culture a topic of discussion for Senior Leadership and the Board? Is culture change a strategic priority?

Engage your Senior Leadership and Board in a dialogue around culture. Set the context as to why culture is important and the impacts it can have (positive and negative).

- What is the organization's desired culture?
- Are the Board and Management aligned and committed to the desired culture?
- What is your organization's strategy, and how does culture support this? What are the intended business results/impact?
- How are the values integrated into the organization's mission, vision, strategic priorities, and decision-making processes?
- How does culture support business objectives?
- Are definitions and specific expectations associated with the values clearly defined, articulated?

How KPMG can help...

KPMG can help your organization 'Make it Clear' by identifying and illuminating core assumptions and driving behaviors that make up the current state culture. Through the use of our proprietary enablers and accelerators, we can also assist in the definition of behaviors that will support business objectives and help you determine the gaps between the current and desired future state.

KPMG enablers & accelerators:

- Organization values profiler – web-based approach to evaluating organizational relationships, current state culture, and desired future state culture. Tool can be used to support culture transformation and M&A integration to analyze tensions between the profiles of organizations at stake. The results are used to identify where the greatest tensions / dilemmas exist, and support sustainable cultural transformation.
- Web cue – modular, Internet-based questionnaire designed to identify the key challenges faced by the organization expressed as dilemmas, prioritize actions, tailor the interventions to specific needs and circumstances of an organization and quickly engage respondents into meaningful discussions.
- Risk culture analysis – analysis of cultural elements of the way an organization approaches risk management practices. The results can identify areas to focus intervention initiatives or efforts.
- Facilitated leadership workshop(s) – facilitated leadership workshops to support clarity and alignment on desired culture and linkage to organizational strategy.

2. Make it known

Are we aligned?

Before you can develop a roadmap for embedding culture, you need to understand your starting point – current state – and how it compares with your desired state. The diagnosis should examine not only formal systems and processes, but also informal cultural norms, identifying ‘hotspots’ and dilemmas that support prioritization. Equally important is identifying the ‘bright spots’ to understand what is working well. Understanding the current and desired state will help the organization:

- Identify gaps between current and desired culture to help define the actions required and inform prioritization.
- Preserve and leverage what works with the current culture (i.e., value and behavior enablers) to accelerate the change and contribute to positive momentum.
- Appreciate the nature of culture dilemmas that exist within the organization to equip leaders with the knowledge and tools to navigate and reconcile challenges.

Investing in a culture assessment can pay dividends and help the organization leverage bright spots, avoid blind spots, identify hotspots and provide insights critical to meaningful and sustainable change effort. Culture is not evolved with one conversation. It is built by leading, by modeling and by integrating.

‘Tone from the Top’ is often referenced as critical. However, the change effort required should become part of the ongoing leadership narrative at all levels to help ensure the organization has the right tone at the top, mood in the middle, and buzz at bottom. The role of leadership at all levels, and their willingness to consistently message and model the desired behavior will make or break an organization’s culture ambitions. Setting expectations, aligning and mobilizing leadership to role model the desired behaviors at this early stage is important.

Leaders have to understand the expectations and be able to translate and communicate to their teams what this means and to how they operate in the day-to-day. Through role modelling and taking deliberate, visible actions to embody the desired culture, leaders begin to signal what is important to the broader organization and what the expected change looks like.

To ‘Make it Known’ you should understand the current state behaviors, identify the gaps between current and desired future state and mobilize leadership to role model and signal the change that is expected.

What you can do...

Do you know your starting point and where gaps in your current culture exist? Have you identified potential enablers and blockers? How can leaders accelerate the change?

Conduct a culture diagnostic to understand current state culture. Penetrate through the layers of an organization to understand what is being experienced 'on the ground'.

Consider:

- What are the current behaviors that contribute to or detract from the organization's culture ambitions?
- What are the current motivations, beliefs and assumptions of individuals which drive behavior?
- What are the power structures and what roles/groups have the most influence on the desired attributes and results?
- What specific behaviors/actions are needed to drive the desired attributes and results?
- What role is leadership playing in fostering the right culture?
- What roles are team members playing in fostering the right culture?
- What is your plan for communicating and engaging the business on this change journey?
- How do leaders at all levels role model the values?
- How can this change be weaved into/with other priorities, rollouts and initiatives?
- What are the risks involved with changing the culture?

How KPMG can help...

KPMG can support organizations in conducting a culture diagnostic to understand current state and identify gaps to achieving the desired state culture. As part of the diagnosis, KPMG can help leaders identify the cultural dilemmas that exist in the organization, understand how these dilemmas impact the current state culture, and explore how those dilemmas can be navigated in the future.

KPMG can also assist with leadership alignment activities to bring leaders together around a shared future state culture vision, and help leaders develop a plan to determine and communicate the change vision and case for culture change.

KPMG enablers & accelerators:

- Cultural assessment – assessment of current state and desired state culture, and mapping results against a culture maturity model (basic or bespoke).
- Facilitated leadership workshop(s) – facilitated leadership workshops to support clarity and alignment on desired culture and linkage to organizational strategy.
- Communication plan – culture communication plan development and best practice examples.
- Values-to-behaviors workshops – multi-step program designed to expedite the new culture change process by translating core values into meaningful actions relevant to people's daily work and supporting individuals in 'living the values'.

3. Make it real

Changing an organization's culture can seem daunting, but it is possible given the right commitment. Equipped with knowledge of the current state, existing gaps, potential pitfalls and culture 'levers' (see Indicative Culture Levers table below), you are now in a position to 'Make it Real'. In this step, you will define a roadmap for change and how you will get to your desired state culture. Along this journey, you will see that changing the 'soft stuff' requires changing the 'hard stuff' too.

What you can do...

Focus on understanding the enterprise and culture dilemmas that exist which need to be addressed in order to reconcile your current state and desired culture. Once reconciliation steps are agreed, the appropriate actions relating to which culture levers to pull can be understood and the appropriate interventions can be put in place to drive desired changes. However, due consideration should be given to pulling the levers in a balanced way as focusing on only one lever will result in an imbalance in cultural shift, e.g., focusing only on performance management and incentives will not solely bring about the desired changes to capabilities and decision making in affect day to day activities.

Consider:

- How integrated are our values into 'what we pay attention to', 'how we operate', and 'how we enable and support'?
- How will subcultures that exist within my organization be addressed?
- How does country culture impact our ability to embed organizational values?
- How do your current people, process and behaviors reinforce or conflict with your organizational values?
- What are the unintended consequences of current standards and programs (e.g., compliance program, incentive program)?
- What are the areas that require most immediate attention?
- What are the bold decisions that need to be made to symbolize you are committed to the change?
- What good practices exist for embedding and upholding the desired culture that the organization should try to propagate more broadly?
- What combination of levers will have the most impact?
- Is culture considered the responsibility of a single group (e.g., HR, Compliance), or are all leaders, across functions, held responsible?
- What is currently in place that can be leveraged in supporting and expediting our culture journey (e.g., Lines of Defense, existing culture programs)?
- How will success be measured?

Once an organization has agreed on what is required to drive culture change, there is a decision point. Leaders should align on whether they are willing to proceed with carrying out the change program, with the understanding that culture change is a long term initiative and requires commitment at all levels of the organization to see it through.

There are various forces that steer organization culture. It is possible to identify areas or 'levers' in an organization that when the appropriate interventions are applied, will drive desired behavior in other areas. All levers should be considered in balance as pulling one, is unlikely to produce the impact on culture that was intended.

How KPMG can help...

KPMG can support you in translating the culture change vision into reality, moving culture from 'concept' to reality. We assist with developing actionable plans that take into account roles and responsibilities for all three lines of defense. We also take a critical look at how to engage employees in building shaping and owning the culture change.

KPMG enablers & accelerators:

- Technology accelerated organization design – leverages HR and process data to model organization design scenarios in real time, significantly reducing the amount of manual data processing and intervention.
- Change strategy – definition of the approach an organization will take to manage the changes required across the overall culture program of initiatives.
- Change impact assessment – identification of the impacts to customers, operating model, people, process, systems and environment as a result of cultural initiatives or interventions.
- Communication plan – culture communication plan development and best practice examples.
- Culture change metrics and governance - KPMG can help you define and monitor metrics to gauge progress and success over time as well as a governance framework for overseeing change and value delivery.
- Online accelerated collaboration workshop - cutting edge web based real-time interaction tools that quickly and efficiently collect input, ideas, feedback, and hard data from up to 100 participants at a time on key questions confronting an organization.

Indicative Culture Levers:

Capabilities	Skills and competencies to meet the organization's needs <ul style="list-style-type: none"> — Necessary competencies, skills and levels — Ability to perform necessary tasks and activities
Structure	How people are organized, aligned and located <ul style="list-style-type: none"> — Reporting relationships, alignment to business, organizational model, and location — Staffing, Spans of control, levels — Job roles and descriptions
Decisions	Methods, timeliness of decision making, governance of processes and policies <ul style="list-style-type: none"> — Decisions/governance framework; definition and management of processes/policies — Governance committees, meetings — Roles and responsibilities and defined authority levels
Performance Management	Process and measurement of the organization's performance <ul style="list-style-type: none"> — Process for ongoing measurement of performance and actions for improvement — Set of metrics to measure a variety of organizational performance factors
Leadership	Strategic direction, support and communication <ul style="list-style-type: none"> — Organization stewardship including vision/mission and leadership team alignment — The constituency interpreting the external/internal environment and setting strategy — Communication effectiveness and change leadership at all levels
Talent	Programs that support and manage people and talent <ul style="list-style-type: none"> — Recruitment, hiring, retention, and promotion of the right talent — HR processes that assess, recognize, guide, review and reward performance — Programs focused on developing talent, new skills and upgrading skills
Capacity for Change	Ability to undertake and manage changes within the organization <ul style="list-style-type: none"> — History with change (past success and failures) — Number of competing initiatives and priorities, and resistance to change — Sound change management practices (strategy, governance, communication, training)

4. Make it happen

Making it happen is about implementation of the roadmap. Program management structure and rigor will be critical to drive and support strong execution and oversight, especially given the multi-year nature of culture change programs.

Employee engagement and communication should be at the core of the implementation plan, ensuring that the change is visible, that the reasons behind the change are clear and compelling, and that employees see and buy-in to the role they will play in the organization's success. Opportunities for dialogue and feedback, with leadership presence and engagement should be numerous. It is challenging, but critical, that culture expectations penetrate through the layers of an organization and are understood 'on the ground'. Leaders and change sponsors should consider how they will mobilize the network of individuals that will assist in executing the interventions, including the lines of defense.

To 'Make it Happen', measures of success should be defined to help the organization understand the level and pace of progress against the roadmap and the effectiveness of change interventions.

What you can do...

Be realistic about how quickly change will occur and maintain an open feedback loop to gauge progress and adjust course as required. Be willing to make difficult decisions.

- How are you going to launch the change to the organization?
- Do you have the right people in the right roles to drive the culture change (e.g., leadership positions, HR teams, end-to-end process owners)?
- Has the impact of change on jobs been assessed? Who will be most affected, and how? Is new capability required, and if so, how will the need be addressed?
- What transition support will be required? This should be leader-led but you should not expect them to run the program activities on top of their day jobs
- How do engagement and communications activities bring the desired culture (values, behaviors) to life in a way that can be understood and actioned at an individual level in the day-to-day?
- Engage impacted employees and stakeholders in the culture change program. Identify change champions and establish a network of invested individuals who can support and amplify the message across the organization.

How KPMG can help...

KPMG can assist in defining culture metrics and supporting the execution of the culture change program and specific interventions. KPMG's team of professionals will help leaders mobilize the network of individuals that will assist in executing the interventions to relevant lines of defense.

KPMG enablers & accelerators:

- Business readiness evaluation – assessment against criteria, developed with business input, of the Business' readiness to implement and accept the changes being made, in a sustainable way.
- Job impact assessments – clarify how change is impacting an individual's ways of working, reporting and collaboration relationships, activities being performed, customer interactions, et al.
- Culture program launch packaging – development of collateral (video, apps, presentations, branding, leadership messages, rollout plan and content) to launch the culture program to the organization.

5. Make it stick

Measuring culture is important for a number of reasons. First, how do you know if the culture you have is the culture you want? Second, how do you know that the elements of your culture change program are moving the organization in the right direction? Culture is also constantly evolving based on changes in the internal and external environment (e.g., interventions, leadership changes, regulation, geopolitical pressures). Measurement is not something that should happen once, and is not considered the 'end' of your culture change program. It is critical to keep your finger on the pulse of culture and course correct, when and where needed.

'Flying blind' can have serious strategic, operational and compliance risk implications.

To 'Make it Stick', you will need a combination of lead and lag measures to gauge both the progress of your culture roadmap and assess culture across the enterprise over time. Metrics for culture change should take into consideration what the organization has come to know about their dilemmas, reflect the understanding of root causes of behavior and the initiatives underway.

Caution should be exercised to avoid 'check the box' metrics that may be easy to measure, but lack substance and do not clearly indicate whether you are winning or losing.

Roadmap and culture initiatives:

For those organizations who have decided to implement a culture change program, measurement of the progress and success of the initiatives is needed to ensure that the change is sustainable over the long term, that it has been integrated into the organization's business as usual, and that benefits are being realized.

Measurement should occur through the established program management and oversight framework for this discrete change effort. Metrics should be tailored to the objectives of each initiative and work stream to monitor project execution and realization of related culture impacts (i.e., what should look different as a result of this initiative). As metrics are defined and monitored for culture specific initiatives, consideration should also be given to how these measures can be linked with broader enterprise measures of culture.

Enterprise culture:

First, in order to measure enterprise culture, an organization has to be clear on what it is measuring against (see 'Make it Clear' and 'Make it Known'). These definitions will serve as the foundation for your measurement program.

Measuring culture across an enterprise can be difficult because culture is not singular. Organizations are typically a microcosm of subcultures. There may be commonalities across functions, geographies and leaders, but there are likely differences as well. Country culture (i.e., local geographic culture) is also an important consideration as it can have a significant impact upon how business is conducted.

Further, what management pays attention to and talks about matters and sends a signal to the rest of the organization about what is really important. Measuring culture can send a powerful message that values are more than lip service.

The Lines of Defense can serve as a good framework for defining enterprise culture metrics, end to end process metrics, and metrics which measure changes in behaviors at a roles and responsibility level.

First line – Operational management

Management, in coordination with the Board, is responsible for setting culture expectations and bringing the values to life by: integrating values into how the organization operates, signaling what is important through what it pays attention to and enabling and supporting employees in upholding the values. Management oversight should include a values component. First line leaders play a critical role in identifying behaviors that both exemplify and/or counter values expectations and appropriately rewarding the right behaviors, while holding individuals accountable for the wrong behaviors.

Second line – Risk management, compliance, and human resources (HR)

Risk Management, Compliance, Legal, HR, et al play an important role in supporting business stakeholders with the tools to support the desired values culture, as well as providing ongoing monitoring of signals within the organization to facilitate early identification and response. Identifying a suite of culture measures and evaluating the collective results on an ongoing basis will increase the risk agility of the organization in responding to leadership and conduct issues.

Third line – Internal audit

Internal Audit can play an integral role in helping management diagnose potential culture issues and provide an objective view of culture within an organization. Internal Audit are often uniquely positioned to be the 'eyes and ears' of the organization, understanding what is happening and observing leadership and behaviors as they operate across the enterprise. There are a combination of actions Internal Audit departments can take to deliver insight over organizational culture. These include, but are not limited to adding culture considerations to existing audits (e.g., root causing, feedback on observed behaviors), performing standalone culture audits, and expanding the audit universe to areas that significantly influence and signal culture (e.g., hotline reporting, incentive programs, business planning).

What you can do...

Evaluate the role each line of defense can play in measuring culture over time to 'Make it Stick'.

- Do the groups with measurement responsibilities have the right support, capabilities and credibility to measure culture?
- What support is needed to build the right capabilities, processes and metrics to assess culture over time?
- How do the different measures provide insight at an initiative, process and/or enterprise level?
- How is the enterprise view of culture assembled?
- How does the organization learn from mistakes, 'hotspots' and 'bright spots'?
- How are measurement outcomes communicated across the organization, from employees to the Board?

How KPMG can help...

KPMG can assist in defining culture metrics and roles and responsibilities across the lines of defense. KPMG can also support Internal Audit teams in establishing a Culture Audit program, determining the best resourcing model (in-source, co-source, or out-source), and navigating the challenges associated with auditing the 'soft stuff'.

KPMG enablers & accelerators:

- Culture Audit Training – introduce team to culture audit approaches, techniques, opportunities and pitfalls
- Culture Audits – design, develop, support and / or deploy a tailored culture audit program or specific culture audits. Consultation on end-to-end process considerations.
- Culture Maturity Model – design, develop and / or deploy a culture maturity model. The organization can be compared against where it sits in the maturity model, where it wants to sit, and determine the actions that would be required to move it to a more mature state.

Conclusion

Culture is important and the rewards for getting it right or consequences for getting it wrong can be significant (e.g., strategy and change execution, compliance and operational performance, talent retention). That said, tackling the ‘soft’ stuff is hard and takes time and commitment. Most organizations struggle with where to start or even whether this is a topic they want to tackle. Further, programs often end up being ‘check-the-box’ that focus on changing and measuring hard, or structural elements, failing to address the softer, behavioral changes.

Following the approach outlined, allows organizations to make the ‘soft’ stuff identifiable, initiatives to address it actionable, and ways of measuring it practical. That is, KPMG can make the soft stuff, a lot more tangible and less ‘hard’.

The reality is that culture is impacting your organization right now, for better or worse. Taking meaningful steps to understand and shape your culture will help you ensure that *culture doesn’t eat your breakfast*, and provide you with an important enabler to your strategy, operations and compliance ambitions.

Reach out to the KPMG contacts listed on the back cover for more details on how to apply these five steps to your organization.

**For further information about
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help your business, contact us:**

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