The Key Role of the Compliance Ambassadors

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Executive Summary

- Focus on the “Tone at the Middle” having ambassadors encourage the culture of “doing the right thing”

- How to encourage and motivate the ambassadors to spread out the compliance through their business

- Practical guidelines for an effective compliance ambassadors’ program (sponsors, selection process, training, ambassador duties)
What is the Compliance Ambassador program

- **Tone at the Middle** requires a key role of **Senior Management** in reinforcing Compliance messages to the employees.

- The **Ambassadors** are selected **Group managers** from different Business Divisions and they have a **key role** in **proactively enforce Tone at the Middle** across the Group.

- "Ambassador program" is part of **Local Compliance Plans for all Legal Entities**

Why should you run the Compliance Ambassador program

- The **role of the Ambassadors** is of essence to help protecting the Group by **strengthening the culture** of Risk and Compliance.

- Involving our managers outside Compliance helps creating the "**Guardian Angel**" mindset.

- Ambassadors are the "**Compliance Voice**" within daily activities.
What Compliance Ambassadors are expected to do

- Join "Compliance Express" meetings on Compliance topics
- Receive dedicated "Briefs" and/or dedicated "Compliance Message" via mail
- Cascade and endorse the topic or message within their perimeters

Compliance Ambassadors program timeline and milestones

- Kick off 2018: Start dry run of Compliance Ambassador program
  - # of Ambassadors: 18
  - Direct cascading perimeter: >800
  - Verified cascading or endorsing actions: 72

- Selection: process of 2019 Compliance Ambassadors and scope extension
  - Dec 18/Jan 19
  - Compliance ExCos engaged relevant LEs CEOs and top managers
  - Strong support from Group HR
  - TFT goal for cycle 2019
  - "Ambassador program" in Local Compliance Plans

- Award 2019: 2019 program complete
  - Feb 2019
  - 60 Ambassadors + 60 Vice invited
  - video message with CCO
  - 2018 best ambassadors awarded

- Kick off 2019: set up the project kickoff with all the parties
  - Jan 2020
**Compliance Ambassadors 2019 distribution**

*All major functions and businesses covered*

- ambassadors in Bank or Governance function
- ambassadors in International Branch

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**Sessions delivered and scheduled**

- **AML - March 27th**
- **Mifid II - May 24th**
- **Financial Sanctions - June 27th**
- **GDPR - July 11th**
- **ABC&WB - Sep 23rd + Col - Oct 30th**
- **Antitrust - November 8th**

Each topic is delivered to ambassadors in two languages: Italian and English.
**Key Initiatives**

Organized dedicated events, job rotation and internal contests

Dedicated community to cascade and endorse each topic, dedicated mailing list

Developed funny videos and songs, crossword puzzle, funny foto-story, dedicated meetings, Ambassador screen saver

Structured internal newsletter addressed, Conduct Round Tables.

Ambassador presentation video, Ambassador stickers, dedicated events, dedicated section Intranet

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**2019 Ambassador program facts and figures vs 2018 KPIs**

- **Ambassadors and Vice Ambassadors**
  - # of senior managers involved: 2018 - 18, 120 total

- **Cascading perimeter**
  - Direct cascading perimeter, related to Ambassadors’ span of control (~234 on average): 2018 >13,5k, >800

- **Training sessions**
  - 2018: 8 sessions, 14 total

- **Cascading actions**
  - Total # of actions enacted by Ambassadors: 2018: 72 actions, 368 total
Biography & Contacts

Lara Bonora is a Certified Compliance & Ethics Professional (CCEP-I) and she is currently Head of Group Compliance Indirect Model, Oversight & Policies in UniCredit SpA, a leading bank in Italy. She joined the banking sector in 2012 after 7 year experience in consulting for Deloitte and KPMG.

Her main focus is on banking compliance, in her previous role as Head of Group Compliance Culture, Academy and Communication she contributed in designing and implementing the compliance culture program in UniCredit and launching the Code of Conduct communication campaign throughout the Group.

Lara graduated in Economics (Bocconi University, Milan), she achieved a Master in Corporate Investment Banking (SDA Bocconi School of Management, Milan) and a certification on Leading Business Transformation Program (IMD Business School).

Milica Karunc is a Certified Compliance & Ethics Professional (CCEP-I) working in UniCredit SpA, a leading bank in Italy, and currently engaged in Compliance coverage oversight process on the Group level. She graduated in Economics (University of Belgrade, Serbia), started the banking career in 1997 and in 2001 joined UniCredit Group.

In the Bank in Serbia Milica gained significant experience in business development (products and processes in Retail banking) and during her international experience she joined Compliance team in UC Holding company.

As a member of Compliance Culture, Academy and Communication team in UniCredit SpA she has contributed in strengthening of Compliance culture and ethics through the Group, promoted and endorsed Compliance Academy and stimulated the knowledge through effective and dedicated initiatives.