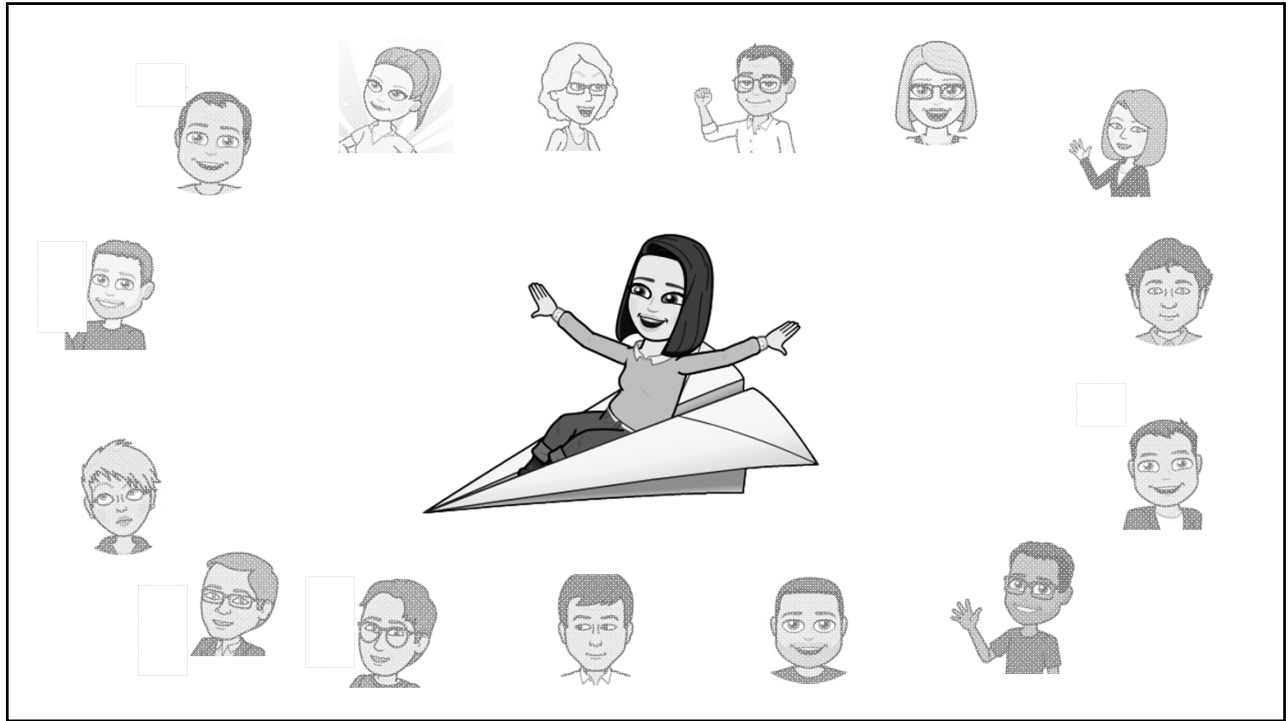




BUILT IN, NOT BOLT ON: CREATING A COMPLIANCE PROGRAM FOR A TECH STARTUP

Danielle Herrick
Head of Compliance
Attune Insurance Services, LLC

*Once upon a time,
in a heavily regulated industry...*



*There were opportunities and
challenges...*

OPPORTUNITIES

- 1 Flat organization, little to no hierarchical challenges
- 2 Bad habits haven't been formed yet
- 3 Ability to be hands on in many (if not all) areas of the organization
- 4 Blank slate

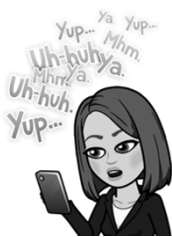
CHALLENGES

- 1 The vision and culture of the organization isn't defined yet
- 2 Priorities are often not aligned with building a compliance program
- 3 There are fires that need to be extinguished
- 4 Fewer resources mean a broad range of responsibilities

TEAM OF 1



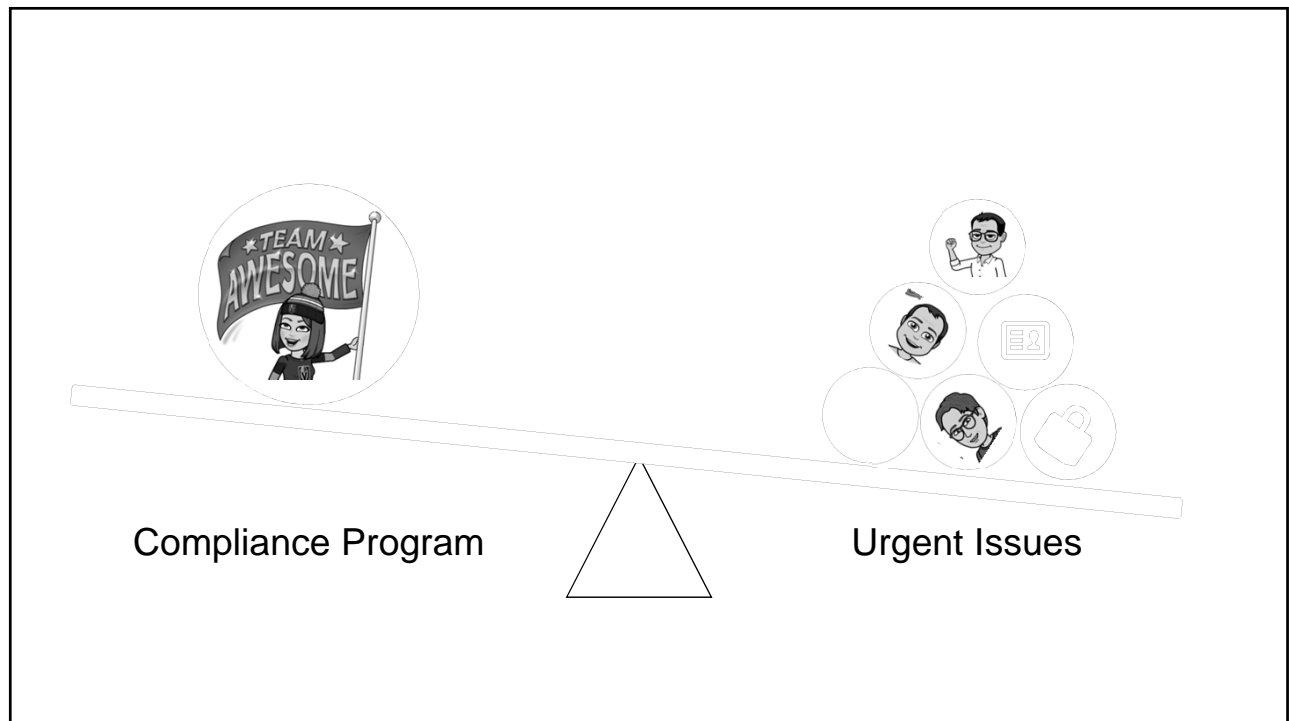
MULTIPLE HATS



Can I help you?



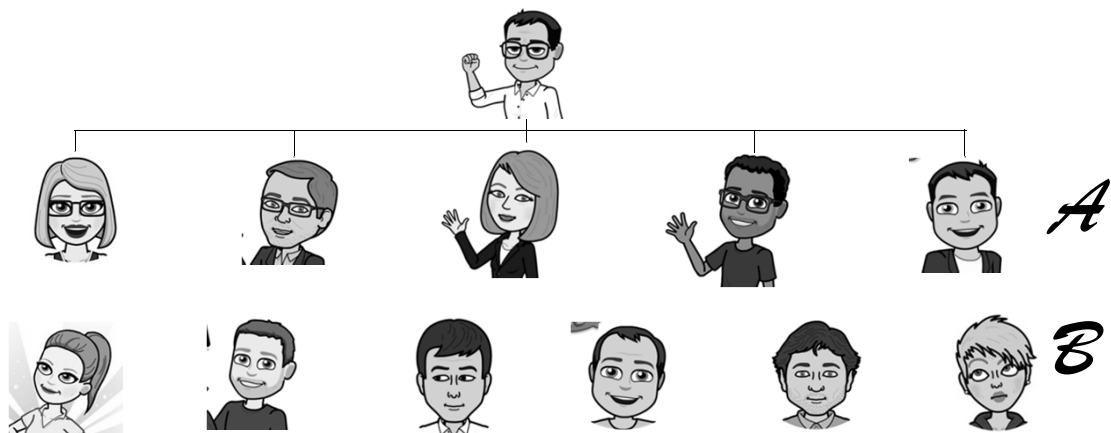
And one day, a compliance program was born...



EFFECTIVE COMPLIANCE PROGRAM

- ▷ Leadership commitment
- ▷ Appropriate responsibility and oversight
- ▷ Policies, procedures and controls
- ▷ Training and awareness
- ▷ Incident management
- ▷ Monitoring and auditing
- ▷ Consistent enforcement and discipline for violations

BUILDING RELATIONSHIPS



CUSTOMIZATION

attune
THE SKINNY ON OUR POLICIES

All employees are required to read and comply with our policies. Below

We operate in a heavily regulated industry.

- We are a licensed property and casualty and surplus lines insurance producer in all 50 states and the District of Columbia.

attune
COMPETITION
MAY 1, 2018
POLICY STATEMENT

OUR RESPONSIBILITIES

business by providing innovative products and mind-blowing customer experience, not by engaging in improper practices.

- Collusion—secretly communicating with others on how we will compete, for example, fixing prices or allocating customers.
- Bid rigging—artificially manipulating the bidding process so that the outcome is pre-determined, such as agreeing to refrain from quoting or withdrawing a quote.
- Tying—forcing customers to take products or services they don't need or want.
- Predatory pricing—pricing goods or services at such a low level that others can't compete and are forced to leave the market.
- Improper exclusive dealing—agreeing with others to do business, or not do business, with another party.

COMPETITIVELY SENSITIVE INFORMATION

Competitively sensitive information includes:

- Current or future pricing, output, costs or quantities of sales
- Strategic plans, data on market share or distribution practices
- Intellectual property
- Terms of services offered to customers, business partners and insureds
- Quote details

We may encounter competitors in social settings or when we participate in trade, industry or professional groups. We are especially careful in these situations not to exchange competitively sensitive information or reach unlawful agreements.

OUR CODE OF CONDUCT
MAY 1, 2018

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At Attune, we strive to make the complex, simple. The time-consuming, easy. The murky, clear. We are creating a better future for small business insurance.

To achieve these goals:

- We bring together diverse talent and create a work environment where employees can be themselves.
- We deliver an exceptional broker and insurer experience through active engagement and a passion for innovative solutions.
- We are moderate in our risk taking and follow the rules and regulations that apply to our business.
- We aren't afraid to fail, but we fail fast and learn from it.
- We act with integrity in everything we do and speak up when we have a concern.

RISK APPETITE



INNOVATION



Information Security
@
attune



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THIRD PARTY VENDOR RISK ASSESSMENT

Certain third party vendors present a higher level of risk to our organization. By assessing the level of risk, we are able to perform an appropriate level of due diligence.

Following the completion of this short risk assessment, compliance will reach out to you regarding next steps. Please contact dherick@attuneinsurance.com with any questions.

* Required

1. Your name *



general - Aug 16th View in channel
Danielle Herrick 10:04 AM
 @channel If you are an Attune employee with a new company phone, please be sure to update your contact information in Bamboo.
 2 reactions

general - Aug 14th
Danielle Herrick 7:06 PM
 @channel It's business continuity testing time for Attune employees! If you're not still at the office, send me screen shots of your critical systems! Thanks for your help getting this done!
 2 reactions

Compliance @ Attune

ANNOUNCEMENTS:

- June 8, 2018 Marketing Do's and Don'ts
- May 7, 2018 - Code of Conduct & Compliance Policies launch
- March 16, 2018 - Reminder: Vendor risk management process
- January 19, 2018 - Beware of phishing scams



IMPORTANT LINKS

- [Ethics Hotline](#)
- [Head of Compliance - Danielle Herrick](#)
- [Incident Report Form](#)

SPEAKING UP

Report potential ethical violations, employee misconduct, fraud, unlawful and other types of improper behavior to your manager, any member of our leadership team, compliance, people operations or the Ethics Hotline.

* Website: www.lighthouse-services.com/attuneinsurance

QUESTIONS?

