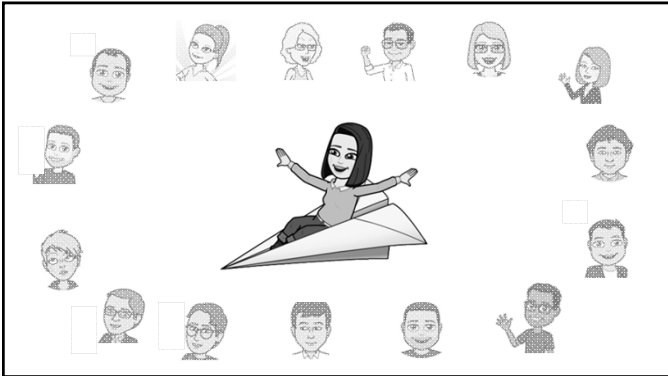




BUILT IN, NOT BOLT ON: CREATING A COMPLIANCE PROGRAM FOR A TECH STARTUP

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*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



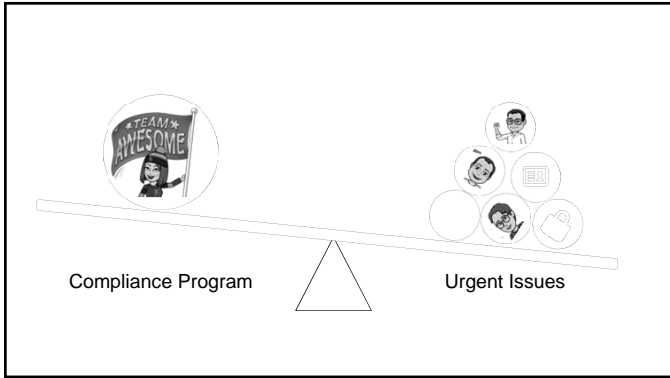
MULTIPLE HATS



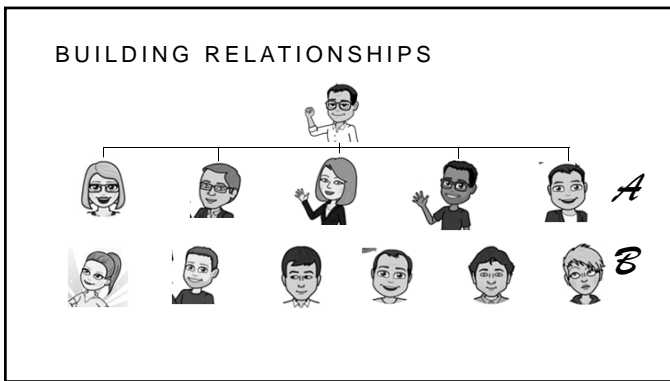
Can I help you?



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



CUSTOMIZATION

attune

THE SKINNY ON OUR POLICIES

All employees are required to read and comply with our policies. Below are links to the policies that apply to you.

OUR CODE OF CONDUCT

attune

attune

COMPETITION

POLICY STATEMENT

OUR RESPONSIBILITIES

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

COMPETITIVELY SENSITIVE INFORMATION

Competitively sensitive information includes:

- Current or future pricing, output, costs or quantities of sales
- Strategic plans, sales or market plans or distribution practices
- Individual projects
- Types of services offered to customers, business partners and affiliates
- Quote sheets

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

RISK APPETITE

INNOVATION

Information Security @ attune

attune

THIRD PARTY VENDOR RISK ASSESSMENT

Compliance @ Attune

ANNOUNCEMENTS

June 4, 2019: Marketing/Direct and Data

May 7, 2019: Code of Conduct & Compliance Policies launch

March 16, 2018: Announce vendor risk management process

January 19, 2018: Review of pricing system

IMPORTANT LINKS

attune.com

Privacy Policy | Code of Conduct | Security Policy

attune.com/privacy

SPEAKING UP

Report potential ethical violations, employee misconduct, fraud, customer or confidential data of Attune, including our third-party vendors, and member of your leadership team, compliance, people operations or the Ethics Office.

1. Who? The ethics officer or the Ethics Office

QUESTIONS?